



City of Los Angeles

Department of City Planning • Environmental Analysis Section

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



Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act
Central City Community Plan Area

Olympic Tower L.A.

Case Number: ENV-2015-4558-EIR

Location: 813-815 W. Olympic Boulevard; 947-951 S. Figueroa Street, Los Angeles 90015

Council District: 14, Jose Huizar

Project Description: The Project site is located on the northwest corner of the intersection of Olympic Boulevard and Figueroa Street, with Olympic Boulevard forming the southern boundary and Figueroa Street forming the eastern boundary of the site. Cottage Place is located on the western boundary of the site and the existing Hotel Figueroa abuts the site to the north. The Project site is currently developed with a single-story structure containing an active car wash and three separate businesses: two restaurants and a ticket agency.

The proposed Project would include the demolition of all existing structures on the site and the construction of a 57-story mixed use development containing 374 residential units, 373 hotel rooms, 33,498 square feet of office space, a 10,801 square foot conference center, and 65,074 square feet of commercial uses. The Project would include 25 commercial condominium units.

The proposed Project uses would be contained in a 57-story, 742-foot high tower and would contain a total floor area of approximately 779,173 square feet.

Discretionary Actions:

1. Pursuant to LAMC Section 12.24-W.1, a Master Conditional Use Permit (MCP) for the sale of alcoholic beverages for on-site and off-site consumption for a total of 20 licenses (16 on-site and 4 off-site).
2. Pursuant to LAMC Section 12.24-X.18, a CUX to allow for dancing and live entertainment.
3. Pursuant to LAMC Section 12.27, a Zone Variance (1) to allow outdoor dining in locations other than the ground floor in the C2-4D zone; and (2) to provide short-term and long-term bicycle parking for the proposed residences on a level other than the ground floor of the development (LAMC Section 12.21 A 16 (e)).
4. Pursuant to LAMC Section 14.5.7, TFAR for the transfer of more than 50,000 square feet.
5. Pursuant to LAMC Section 16.05, Site Plan Review and Approval for the development of a mixed-use project consisting of 374 residential units, 373 hotel rooms, 33,498 square feet of office, 10,801 square feet of conference center, and 65,074 square feet of commercial space.
6. Haul route approval for the export of approximately 115,500 cubic yards of dirt.

APPLICANT:

Olymfig26, LLC
1433 Griffith Avenue
Los Angeles, CA 90021

PREPARED BY:

CAJA Environmental Services
11990 San Vicente Boulevard
Los Angeles, CA 90049

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, CA 90012-2601

June 2016

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1. PROJECT DESCRIPTION

The subject of this Initial Study (IS) is the proposed Olympic Tower L.A. Project. The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the Lead Agency to determine whether an Environmental Impact Report (EIR) or a Mitigated Negative Declaration must be prepared or to identify the significant environmental effects to be analyzed in an EIR.

Project Information

Project Title: Olympic Tower L.A.

Project Location: 813-815 W. Olympic Boulevard; 947-951 S. Figueroa Street, Los Angeles 90015

Project Applicant: Olymfig26, LLC
1433 Griffith Avenue, Los Angeles, CA 90021

Lead Agency: City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750, Los Angeles, California 90012
Attn: Sergio Ibarra

Regulatory Framework

According to CEQA Guidelines, Article 5. Preliminary Review of Projects and Conduct of Initial Study:

15063. INITIAL STUDY

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

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

(2) To meet the requirements of this section, the lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

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

(b) Results.

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

(A) Prepare an EIR, or

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

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

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

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

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

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

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

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

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

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

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

- (4) *Facilitate environmental assessment early in the design of a project;*
- (5) *Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;*
- (6) *Eliminate unnecessary EIRs;*
- (7) *Determine whether a previously prepared EIR could be used with the project.*

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

- (1) *A description of the project including the location of the project;*
- (2) *An identification of the environmental setting;*
- (3) *An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.*
- (4) *A discussion of the ways to mitigate the significant effects identified, if any;*
- (5) *An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;*
- (6) *The name of the person or persons who prepared or participated in the Initial Study.*

Regional Setting

The Project Site is located at 813-815 W. Olympic Boulevard and 947-951 S. Figueroa Street, in the Central City Community Plan area (CCCP) in the City of Los Angeles (City), approximately 1 mile southwest of the Los Angeles Civic Center. The Site is approximately 2 miles northwest of the City of Vernon boundary south of Washington Boulevard and is approximately 3.5 miles west of the unincorporated Los Angeles County (East Los Angeles area) boundary at Indiana Street. The CCCP area is in the Downtown section of Los Angeles. The plan area is bounded by Sunset Boulevard/Cesar Chavez Avenue to the north; Alameda Street to the east; the Santa Monica Freeway (Interstate 10) to the south; and the Harbor Freeway (California State Route 110) to the west. The eastern edge of the approximately 2-mile wide by 2-mile long plan area is on the eastern edge of downtown Los Angeles, while the western edge abuts the western side of downtown Los Angeles. The CCCP area is surrounded by the City of Los Angeles community plan areas of Central City North to the north and the east; Southeast Los Angeles to the south; and both Westlake and South Los Angeles to the west.

See Figure 1, Regional Vicinity Map, for the location within the context of the City. See Figure 2, Aerial Map, for the Project Site and immediate surrounding areas.

Regional and Local Access

Regional access is provided by the Harbor Freeway (CA-110) located approximately 700 feet west of the Site and the Santa Monica Freeway (I-10) located approximately 0.4 mile to the south. Local access is provided by Olympic Boulevard, Figueroa Street, Flower Street, 9th Street, and 11th Street.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus, transitway, and rail service to the immediate vicinity of the Project Site. Olympic Boulevard carries Metro Rapid bus line 728 and Metro Local bus line 28 past the Project Site with a stop adjacent to the Site. Figueroa Street carries Metro Express bus lines 442 and 460 and Metro Local bus line 81 past the Project Site (northbound) and one block to the east on Flower Street (southbound). In addition, the Metro Silver Line transitway (Metro Busway Routes 910 and 950X), running from El Monte to San Pedro via Downtown, runs northbound on Figueroa Street past the Site and southbound on Flower Street, one block to the east.

The Metro Rail Expo and Blue Lines run beneath Flower Street, one block to the east of the Project Site. The Pico Station is located on these lines approximately 0.2 mile (three blocks) south of the Project Site. The 7th Street/Metro Center station, which serves the Expo and Blue Lines as well as the Red and Purple Lines, is located approximately 0.35 mile (four blocks) northeast of the Project Site.

The Metro Blue Line provides rail service from Downtown Los Angeles to Downtown Long Beach. The Metro Expo Line currently provides rail service from Downtown Los Angeles to Culver City and will extend to Santa Monica by May 2016.

Site Characteristics

The Project Site is located on the northwest corner of the intersection of Olympic Boulevard and Figueroa Street. The Site is bounded by Figueroa Street on the east, Olympic Boulevard on the south, Cottage Place on the west, and an adjacent hotel (Hotel Figueroa) on the north. The Project Site's assessor parcel number (APN), zoning, land use designation, and lot size is listed on Table 1. The total area that composes the Project site is approximately 37,031 net square feet (or 0.82 acre). The Site is zoned C2-4D (Commercial, Height District 4 with Development Limitation) and is designated Commercial in the Central City Community Plan. The Project Site is also located within the Los Angeles State Enterprise Zone, the Greater Downtown Housing Incentive Area, and is located within a Freeway Adjacent Advisory Area for Sensitive Uses (applicable to all properties within 1,000 feet of a freeway within the City of Los Angeles).

**Table 1
Project Site Information**

Address	APN	Zoning	Census Tract	Land Use Designation	Size
811 W. Olympic Blvd. ¹	5138-003-014	C2-4D	2077.10	Commercial	37,031 sf
<i>Source: Nardi Associates LLP; http://zimas.lacity.org/ ¹ Secondary addresses of 815 W. Olympic Blvd. and 947-951 S. Figueroa Street.</i>					

Existing Uses

The Project Site is completely developed at the present time with a single concrete block type structure containing a commercial car wash and detailing center and three smaller businesses. The car wash occupies the majority of the structure, with the detailing area being located outside at the lot corner adjacent to Cottage Place and Olympic boulevard. A hand waxing area under an overhead shed, a garbage enclosure, and a car port over the entrance to the washing area (extending north to the wall on the northern Site boundary) are located in the north and western portions of the Site. A shoeshine service is located inside the lobby/waiting area of the car wash.

The other businesses currently occupying individual storefronts within the building consist of EJ's Bites (at 949 Figueroa Street), a small dine-in restaurant occupying approximately 2,500 square feet; VIP Tickets (at 951 Figueroa Street), approximately 1,000 square feet and featuring an exterior LED sign strip along the building roofline; and Fernando's Taco Inn (at 815 Olympic Boulevard), a dine-in restaurant occupying approximately 2,000 square feet.

Two ornamental (non-protected) trees are present on the Project Site itself. Four street trees are located within the sidewalks adjacent to the Project Site. See Figure 3, Existing Site Plan, for an illustration of the current development at the Site.

Surrounding Uses

- To the east across Figueroa Street (on the northeast corner of Figueroa and Olympic) is a 24-story residential high-rise building with lower floor parking and ground floor retail, including a Wells Fargo Bank [zoned C2-4D].
- To the south across Olympic Boulevard (on the southwest corner of Figueroa and Olympic) is the 5-story L.A. Live entertainment, media, office, and retail complex, which includes ground floor restaurants facing the Project Site [zoned LASED: Sports and Entertainment District Specific Plan Zone].
- To the west across Cottage Place is a commercial surface parking lot [zoned C2-4D].
- To the north and immediately adjacent to the Project Site is the 13-story Figueroa Hotel built in 1926 [zoned C2-4D].

The nearest existing residential uses are the apartments and condominiums in the 24-story tower across Figueroa Street to the east, approximately 50 feet away from the Site.

Proposed Project

The Project proposes the removal of all existing structures, and construction of a single 57-story high-rise tower building containing up to 65,074 square feet of retail/commercial space (in three stories); 33,498 square feet of office space (in six stories); 10,801 square feet of hotel conference center/ballroom space (on one story); 8,448 square feet of residential condominium amenities (on the same story as the hotel conference center); 373 hotel rooms (216,065 square feet in 17 stories, including lobby/amenities level); 344 residential condominium units (366,805 square feet in 20 stories); 30 two-level residential condominium units (68,926 square feet in four stories); and 9,556 square feet of penthouse amenity area (in two stories). A six-level subterranean parking garage would be located beneath the building, and eight levels of additional parking would be provided within the building, including two parking-only stories as well as additional parking on each of the six office stories of the structure. Two additional stories dedicated to mechanical facilities would also be included in the proposed structure.

Table 2, Proposed Floor Area, provides a breakdown of the proposed uses. Parking areas are excluded from the information in Table 2, but would be located on Levels 4 through 11 (for the office, commercial, and hotel uses) and in six levels of subterranean parking (for the residential uses).

**Table 2
Proposed Floor Area**

Use	Stories	Size (sf)
Retail/Commercial	1-3	65,074
Office	6-11	33,498
Hotel Conference Center/Ballroom	13	10,801
Condominium Amenities	13	8,448
Hotel Lobby/Amenities	14	13,029
Hotel (373 rooms)	15-30	203,036
Condominiums (344 units)	32-51	366,805
Two-Level Luxury Condominiums (30 units)	52-55	68,926
Penthouse Amenities/Rooftop	56-57	9,556
Total	57	779,173

City of Los Angeles Planning and Zoning Floor Area excludes exterior walls, stairs, shafts, rooms housing building equipment, parking areas, driveways, ramps, basement storage. It includes private balconies enclosed on three sides by walls.

The Project would be developed in a single building fronting on Olympic Boulevard. Figure 4 presents the proposed site plan and a rendering of the Project's appearance. Figure 5 contains a diagram illustrating the breakdown of the uses and levels in the Proposed Project.

The Project would be 57 stories and approximately 742 feet in height above the six subterranean parking levels, which would extend approximately 64 feet below grade. The ground floor and first two levels

above the ground floor (Levels 1-3) would contain retail space. Levels 4 and 5 would contain ramp-accessed parking. Levels 6-11 would contain a combination of office/conference room space and ramp-accessed parking. Level 12 would contain mechanical space. Level 13 would contain both the hotel conference center/ballroom area and the residential amenities for the condominiums. Level 14 would contain the hotel lobby and hotel amenities. Levels 15-30 would contain the hotel rooms. Level 31 would also be reserved for mechanical purposes. Levels 32-51 would contain the residential condominiums. Levels 52-55 would contain the two-level luxury condominium units. Lastly, Levels 56-57 would serve as the rooftop penthouse amenities area.

Residential Uses

The Project would contain a total of 374 residential units to be distributed as shown in Table 3.

**Table 3
Project Residential Unit Distribution**

Type	Quantity	Percent	Stories
Studio	24	6.4	32-34
1-Bedroom	200	53.5	32-47
2-Bedroom	64	17.1	32-47
2-Bedroom Luxury	56	15.0	48-51
3-Bedroom Two-Level Penthouse	30	8.0	52-55
Total	374	100	24

Source: Nardi Associates LLP

Retail Uses

The 65,074 square feet of retail/commercial uses within the Proposed Project would be located on the ground floor and the two levels immediately above the ground floor. Retail uses would primarily front on Olympic Boulevard and would include sidewalk-adjacent outdoor dining areas.

Access

Vehicular access to the Proposed Project would come via Cottage Place on the west side of the Project Site. From Cottage Place, vehicle access would be provided to both the subterranean parking garage and the ramp-accessed parking on levels 4 through 11 of the tower building. The loading area and taxi/valet/pedestrian drop-off areas would also be accessed via Cottage Place. Pedestrian access would be available on all sides of the Site except the north.

Parking

Table 4 presents the amount of code-required and Project-provided parking. The Project is required to have 588 spaces (after applicable code-allowed reductions) and would provide 838 spaces.

**Table 4
Vehicle Parking**

Use	Amount	Rate	Total
Required Parking			
Residential - Studio	24 units	1.0 space/unit	24
Residential – Condo (3 habitable rooms)	200 units	1.0 space/unit	200
Residential – Condo (>3 habitable rooms)	64 units	1.25 spaces/unit	80
Residential – Luxury Condo (>3 habitable rooms)	56 units	1.25 spaces/unit	70
Residential – Penthouse Condo (>3 habitable rooms)	30 units	1.25 spaces/unit	38
Hotel (Rooms 1-20)	20 guest rooms	1:2 space/guest room	10
Hotel (Rooms 21-40)	20 guest rooms	1:4 space/guest room	5
Hotel (Rooms 41-373)	373 guest rooms	1:6 space/guest room	56
Ballroom/Conference Center	10,801 sf	1 space/100 sf	108
Office	33,498 sf	1 space/1,000 sf	33
Retail/Commercial	65,074 sf	1 space/1,000 sf	65
Initial Total Required			689
<i>Parking Reductions – Proximity to Light Rail</i>			<i>145</i>
<i>Parking Reductions – Provided Bicycle Parking</i>			<i>142</i>
Final Total Required			588^a
Provided Parking			
Below ground (six levels for residential uses)			438
Above ground (on Levels 4-11 for commercial, hotel, and office uses)			400
Total Provided			838
<i>^aOnly the smaller of the two applicable parking reductions is applied to the initial number of code-required parking spaces per land use category.</i>			
<i>Source: Nardi Associates LLP</i>			

Bicycles

LAMC 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Multi-family residential buildings with more than three dwelling units require one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. Office uses require one long term bicycle parking space per 10,000 square feet and one short term bicycle parking space per 5,000 square feet. Retail uses require one long term and one short term bicycle parking space per 2,000 square feet. Hotel uses require one long term and one short term bicycle parking space per 20 guest rooms. Ballroom/conference uses require one long term bicycle parking space per 700 square feet and one short term bicycle parking space per 350 square feet.

Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As required and demonstrated below in Table 5, the Project will

provide, at a minimum, 123 short term and 448 long term bicycle spaces, consistent with code requirements.

**Table 5
Bicycle Parking**

Use	Amount	Rate	Short-Term	Long-Term
Residential	374 units	1 per 10 units (short-term) 1 per unit (long-term)	37	374
Hotel	373 rooms	1 per 20 rooms (short-term) 1 per 20 rooms (long-term)	19	19
Ballroom/Conference	10,801 sf	1 per 350 sf (short-term) 1 per 700 sf (long-term)	31	15
Office	33,498 sf	1 per 10,000 sf (short-term) 1 per 5,000 sf (long-term)	3	7
Commercial	65,074 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	33	33
Total			123	448

Source: Nardi Associates LLP

Height

The Proposed Project would be 742 feet and one inch above the ground level. There is no maximum height limit within the C2 zone. The C2-4D zoning classification allows a Floor Area Ratio of 6:1. The Applicant is requesting a Transfer of Development Rights (TFAR) of approximately 559,452 square feet, to increase the maximum floor area ratio to 13:1, to allow for sufficient floor area to build the Project.

Open Space

The amounts of required and provided open space for the residential uses in the Proposed Project are presented in Table 6. The Project is required to have 42,650 square feet of open space. The Project would provide 73,848 square feet of open space.

**Table 6
Open Space**

Residential Unit Type	Amount	Rate	Total size (sf)
Required Open Space			
Studio	24 units	100 sf/unit	2,400
One-bedroom	200 units	100 sf/unit	20,000
Two-bedroom	64 units	125 sf/unit	8,000
Luxury two-bedroom ^a	56 units	125 sf/unit	7,000
Penthouse three-bedroom	30 units	175 sf/unit	5,250
Total Required			42,650
25% allowed to be indoor/covered public spaces			10,662.5

75% allowed to be outdoor/open to the sky		31,987.5
Provided Open Space		
Public Open Space	Outdoor (sf)	Indoor (sf)
Level 13	11,370	8,112
Level 56	13,703	5,085
Level 57	721	3,749
Total Public	25,794	16,946
Private Open Space	Outdoor (sf)	Indoor (sf)
Levels 32-35 (x4 levels)	400	1,010
Levels 36-47 (x12 levels)	400	1,010
Levels 48-51 (x4 levels)	194	471
Level 52	431	1,195
Level 53	366	952
Level 54	431	1,195
Level 55	366	952
Total Private	8,770	22,338
Total Open Space Provided		73,848
Total Outdoor		34,564
Total Indoor		39,284
^a Corner condominium units.		
Source: Nardi Associates LLP		

Landscaping

No native trees are present on the Project Site or in the sidewalks adjacent to the Project Site. Existing trees, including street trees, would be removed to facilitate development of the Project. Proposed landscaping would consist of trees throughout the ground floor exterior of the Project as well as trees in planters in all of the exterior common spaces throughout the building. Additionally, the Project is designed to be seen as a “vertical garden”, with vines and other vegetation running along cables attached to the building’s exterior.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).¹

Signage/Exterior Building Treatments

Conceptually, the iconic building is envisioned as an urban tree, with real vegetation combined with digitized landscape and graphic art images growing along its structural grid to further create the

¹ Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>

perception of a kaleidoscope. The presence of a large, elevated, landscaped atrium on the 13th floor is intended to soften the impact of a tall structure in relation to the surrounding buildings. Similarly, the Project's bent geometry is designed to further soften the impact of the Project's mass and height.

As designed, the structural component is the foundation of Olympic Tower's architectural expression, creating a steel exoskeleton that wraps around the entire building envelope, eliminating the need for interior columns and culminating at the roof top with a steel trellis tying the vertical structural grid and exoskeleton together. The result is that the building's exterior would be well-articulated, and able to offer a soaring mid-tower atrium that would create new vantage points and give hotel guests and visitors sweeping views of the City. In accordance with the City's latest standards, the Project would achieve an articulated pinnacle by providing a fire elevator all the way to the top, negating the need for a roof top helistop.

The Project would comply with Section 8 of the Downtown Design Guide by utilizing a variety of building materials, colors, and elements, such as balconies, the exoskeleton itself, green walls within the exoskeleton, and various wall planes. Along the Olympic Boulevard and Figueroa Street frontages, a variety of textures and materials would be employed, including plaster, glass, and metal cladding. In addition, the Project includes a diamond pattern metal exoskeleton that will be the focal point of the exterior elevations. LED lights and photovoltaic panels would be embedded in portions of the glazing within the exoskeleton. These elements would help break up the building facades and meet the intent of the Downtown Design Guide to provide interesting articulated walls.

Exterior signage would consist of security, wayfinding, and commercial signs.

Construction Information

The estimated construction schedule is shown in Table 7. Operation would begin in 2019. The amount of materials exported from the Project Site as a result of excavation is estimated to be approximately 115,500 cubic yards.² The Project would contain six subterranean levels under the proposed tower building (approximately 64 feet below grade) in addition to any other excavation typically required for foundation and utility work.

² *Estimates provided by the Applicant, December 2015.*

**Table 7
Estimated Construction Schedule**

Phase	Duration
Demolition	6 weeks
Site Preparation	2 weeks
Grading/Excavation	2 months
Building Construction	1 year
Architectural Coatings	2 months
Paving/Landscaping	2 months

Construction schedule, including start, end, and duration dates are estimates only.

Haul Route

A Haul Route program will be required as part of the City's permitting process. It is anticipated that the demolition, export, and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. The estimated haul route is approximately 25 miles and will generally include (most direct path, and to avoid residential neighborhoods): local streets (Olympic Boulevard) to CA-110 freeway to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Boulevard to San Fernando Road to Sunshine Canyon Landfill.

Project Objectives

The objectives of the Project are as follows:

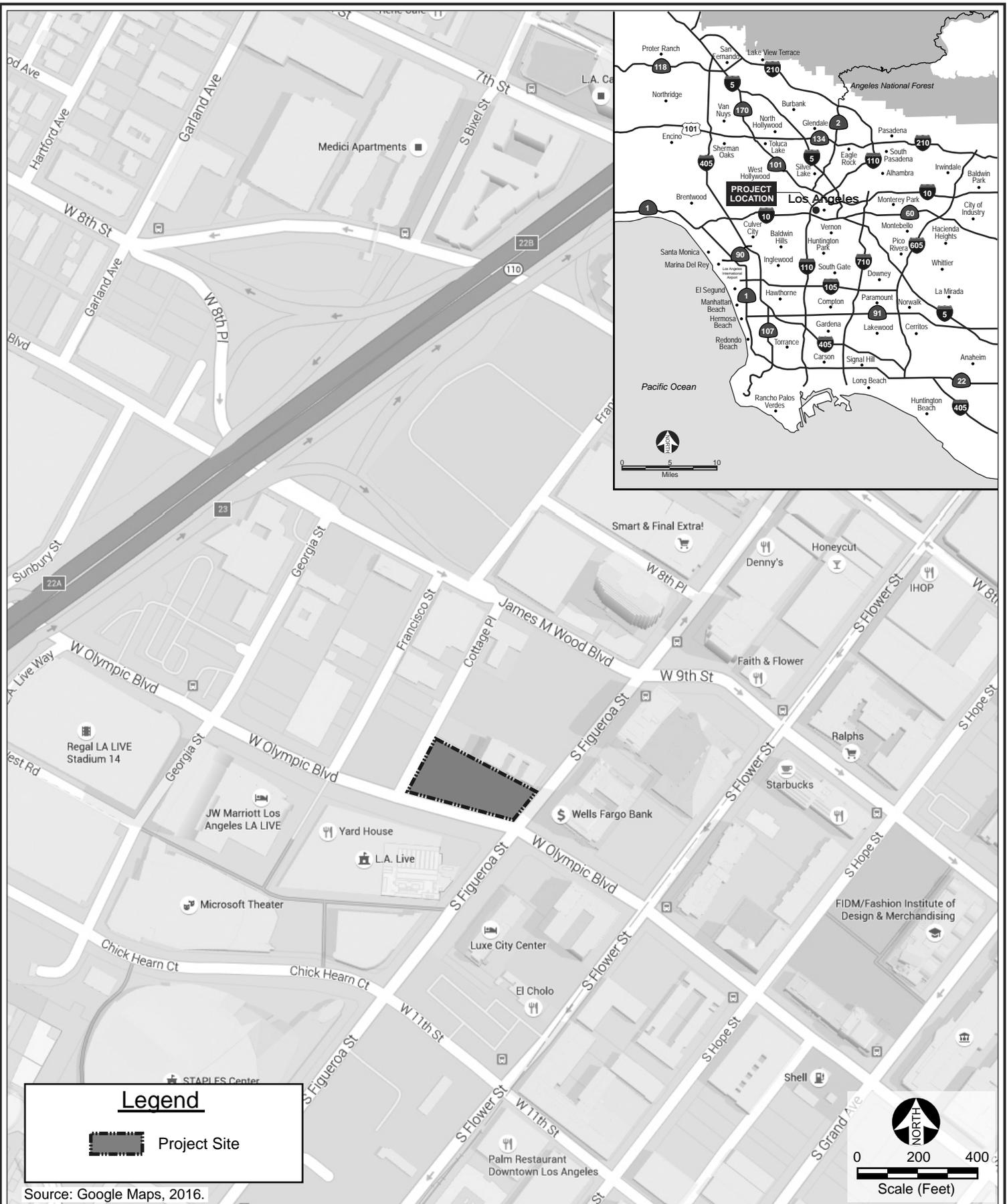
- Develop an iconic, architecturally-compelling tower that adds visual distinction and a unique feature to the Downtown Los Angeles skyline.
- Capitalize on a smart growth opportunity by intensifying a currently underutilized site with residential, office, and visitor-serving hotel uses near public transit lines (Metro Rail and Bus) and the Los Angeles Sports and Entertainment District.
- Create a pedestrian friendly commercial retail zone that is readily accessible to future residents, hotel guests, and L.A. Live patrons.
- Contribute unique housing opportunities toward the City's Regional Housing Needs Assessment (RHNA) allocation.
- Provide residential uses in the same location as commercial and office uses.

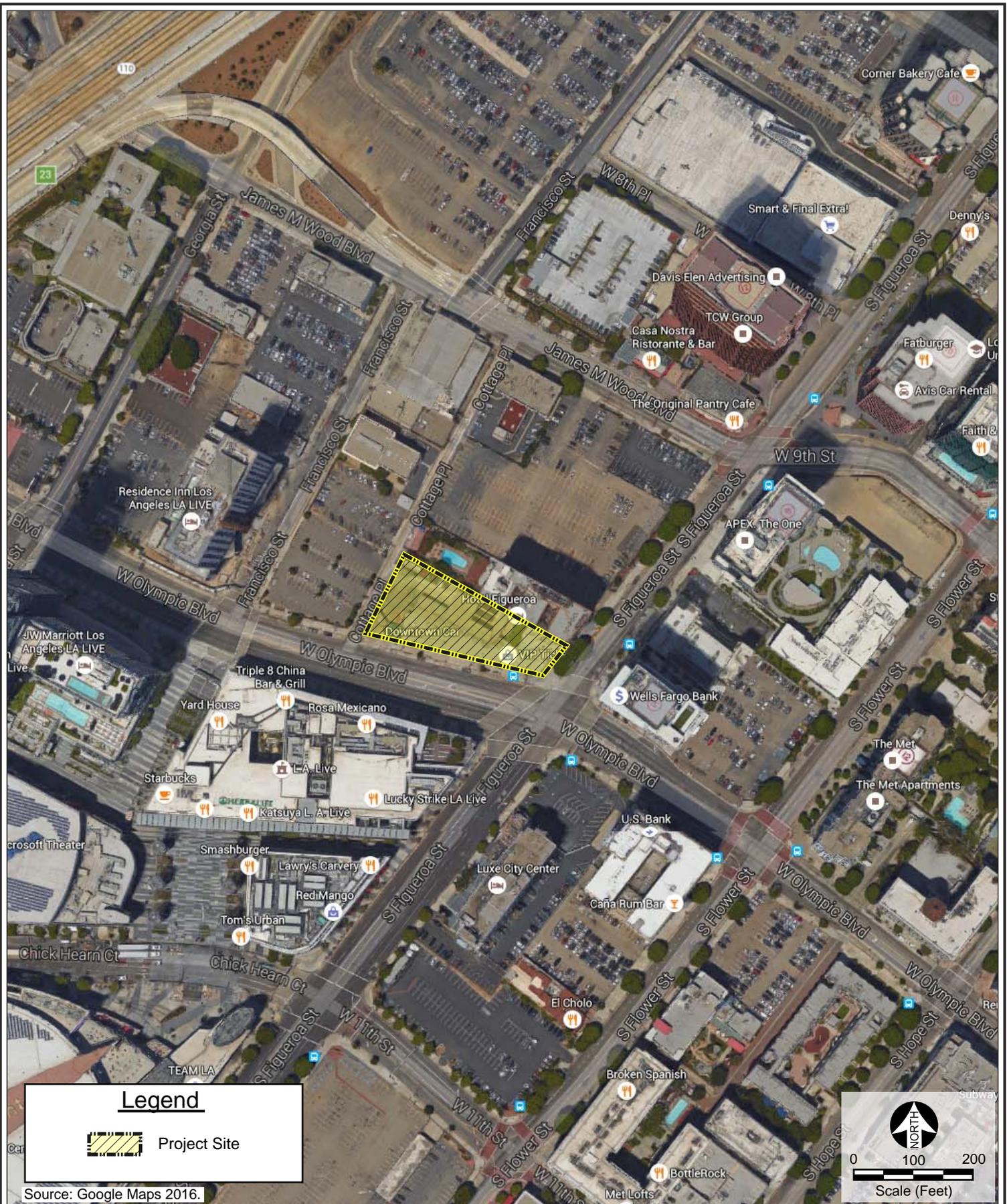
- Contribute to the City's economic growth by developing commercial, residential, and hotel uses that generate local tax revenues, provide new construction jobs, and generate residents who support local businesses.

Requested Discretionary Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the Applicant is requesting approval of the following actions from the City:

1. Pursuant to LAMC Section 16.05, Site Plan Review.
2. Pursuant to LAMC Section 14.5, Transfer of Floor Area of more than 50,000 square feet.
3. Pursuant to LAMC 12.24 W.1, Master Conditional Use Permit for off-site (grocery store, wine store) and on-site (restaurants and hotel) sales and consumption of alcoholic beverages.
4. Pursuant to LAMC Section 12.24 W.18, Conditional Use Permit for Live Entertainment (dancing).
5. Pursuant to LAMC Section 14.14 A(b)(3), Zone Variance to allow outdoor dining in locations other than the ground floor in the C2 zone.
6. Pursuant to LAMC Section 12.21 a.16(a)(6)(e)(2)(iii), Zone Variance to allow short-term and long-term bicycle parking to be located on the second level of the underground garage in lieu of being located on the ground level or the level closest to the ground level.
7. Pursuant to LAMC Section 17.01 and 17.13, Vesting Tentative Tract Map No. 73966 (including haul route approval) for the creation of airspace lots, including residential and commercial condominium units.





Legend

 Project Site

Source: Google Maps 2016.



0 100 200
Scale (Feet)

Figure 2
Aerial Map

C. SPACING

Tower Spacing

Towers should be spaced to provide privacy, natural light and air, as well as to contribute to an attractive skyline.

- Generally, the portion of a tower above 150 feet shall be spaced at least 80 feet from all existing or possible future towers, both on the same block and across the street, except where 1) the towers are offset (staggered), 2) the largest windows in primary rooms are not facing one another, or 3) the towers are curved or angled, as illustrated in Figure 6-2.

Where there is an existing adjacent tower, the distance should be measured from the wall of the existing adjacent tower to the proposed tower. Where there is no existing adjacent tower, but one could be constructed in the future, the proposed tower must be 40 feet from an interior property line and 40 feet from the alley center line shared with the potential new tower as shown in Figure 6-2.

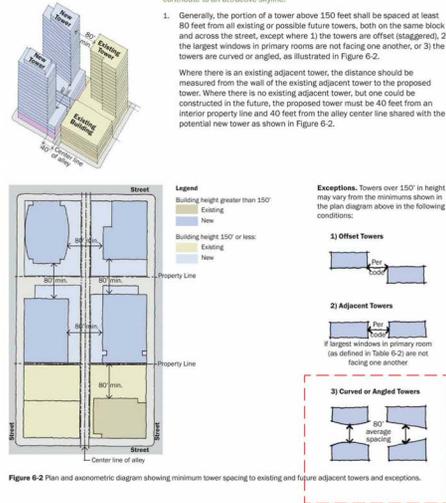
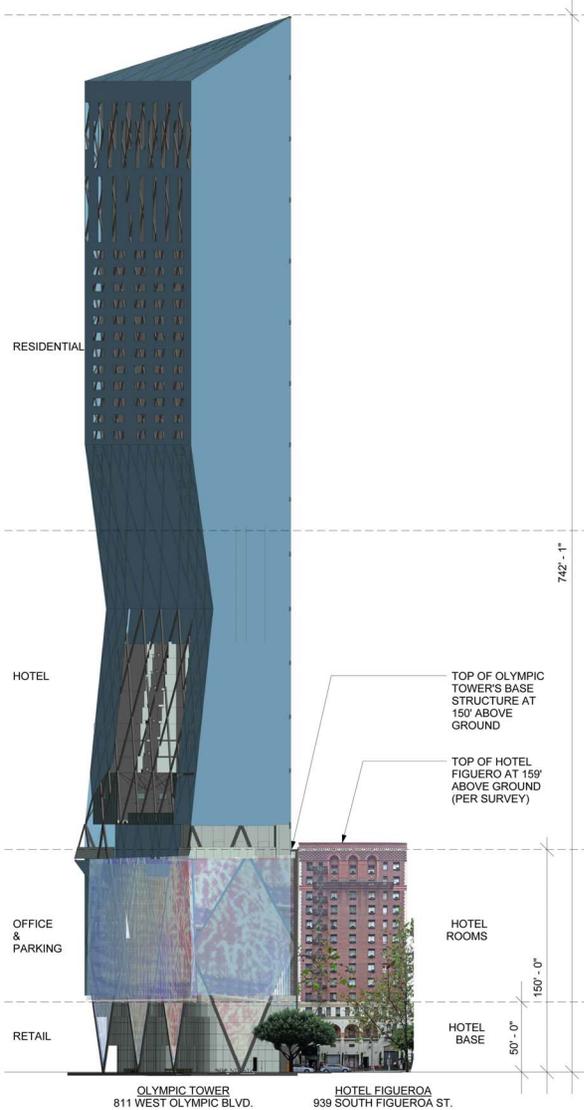


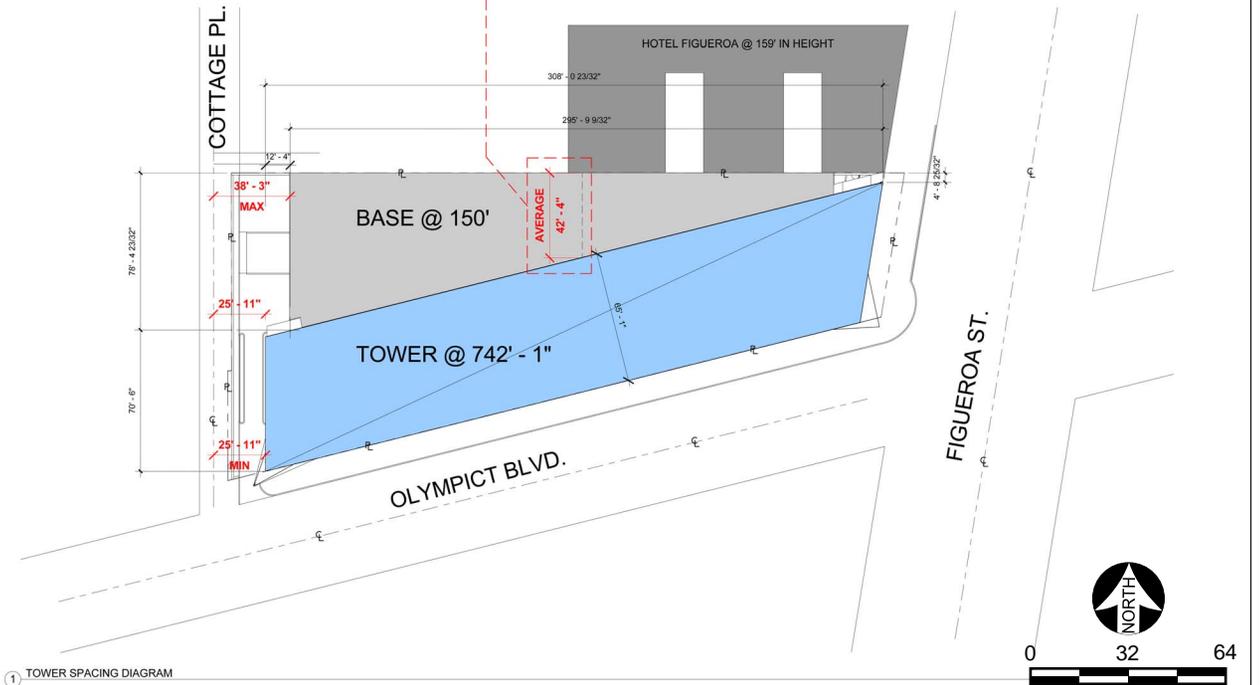
Figure 6-2 Plan and axonometric diagram showing minimum tower spacing to existing and future adjacent towers and exceptions.

30 Downtown Design Guide 6.15.09

LAMC 12.22 A.18 (c)(3)
 (3) No yard requirement shall apply to the residential portions of buildings located in lots in the CR, C1, C1.5, C2, G4, and C5 Zones used exclusively for residential uses, but a street, private street or alley, and the first floor of such buildings at ground level is used for commercial

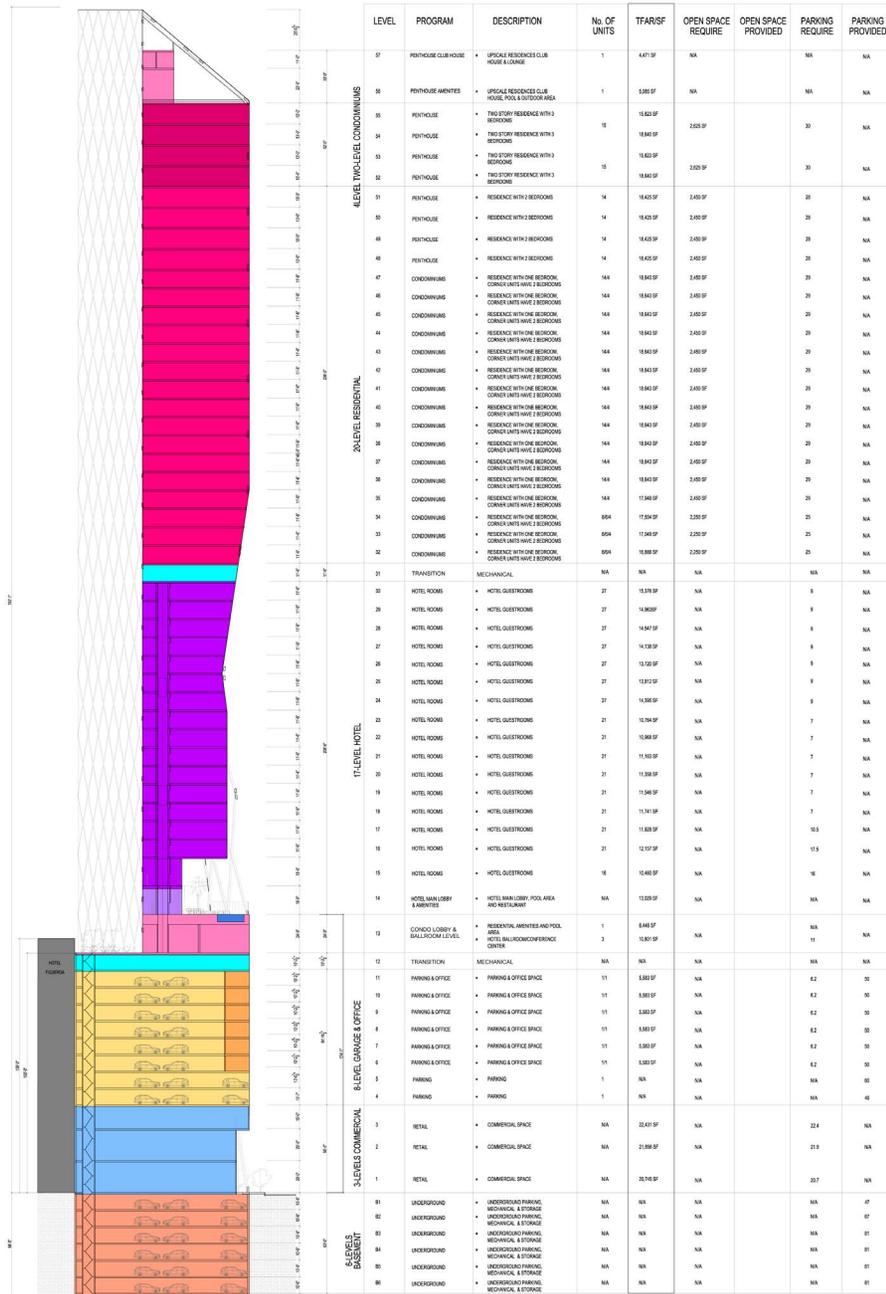


2 OLYMPIC TOWER RELATIONSHIP WITH HOTEL FIGUEROA ALONG FIGUEROA STREET



1 TOWER SPACING DIAGRAM

Source: Nardi Associates LLP Architects, 2015.



VEHICLE PARKING CALCULATIONS PER CITY OF LOS ANGELES BUILDING CODE

RESIDENTIAL - 412 SPACES
 - STUDIO W/ KITCHEN - 24 UNITS x 1.0 SPACE/UNIT = 24 SPACES
 - CONDOMINIUMS (3 HABITABLE ROOMS INCLUDING KITCHEN) - 200 UNITS x 1 SPACE/UNIT = 200 SPACES
 - CONDOMINIUMS (>3 HABITABLE ROOMS) - 64 UNITS x 1.25 SPACE/UNIT = 80 SPACES
 - LUXURY CONDOMINIUMS (>3 HABITABLE ROOMS) - 56 UNITS x 1.25 SPACE/UNIT = 70 SPACES
 - PENTHOUSE CONDOMINIUMS (>3 HABITABLE ROOMS) - 30 UNITS x 1.25 SPACE/UNIT = 38 SPACES

HOTEL - 71 SPACES
 - 1-20 GUEST ROOMS - 20 x 1.2 SPACE/GR = 10 SPACES
 - 20-40 GUEST ROOMS - 20 x 1.4 SPACE/GR = 5 SPACES
 - 40-373 GUEST ROOMS - 373 x 1.6 SPACE/GR = 56 SPACES

BALLROOM/CONFERENCE CENTER - 108 SPACES
 - CONFERENCE ROOM - 10,801 SF (1-100 SF) = 108 SPACES

OFFICE - 33 SPACES
 - OFFICE SPACE - 33,498 SF (1-1,000 SF) = 33 SPACES

COMMERCIAL - 65 SPACES
 - COMMERCIAL - 65,074 SF (1-1,000 SF) = 65 SPACES

PARKING REQUIRED: 689 SPACES

PARKING REDUCTIONS:

PARKING REDUCTION - DUE TO PROXIMITY TO LIGHT RAIL - 145 SPACES
 RESIDENTIAL: 15% REDUCTION = 62 SPACES
 HOTEL: 15% REDUCTION = 21 SPACES
 BALLROOM/CONFERENCE CENTER: 30% REDUCTION = 32 SPACES
 OFFICE: 30% REDUCTION = 10 SPACES
 COMMERCIAL: 30% REDUCTION = 20 SPACES

PARKING REDUCTION - DUE TO BICYCLE PARKING PROVIDED - 142 SPACES
 RESIDENTIAL: 1:4 REDUCTION = 103 SPACES
 HOTEL: 1:4 REDUCTION = 9 SPACES
 BALLROOM/CONFERENCE CENTER: 1:4 REDUCTION = 12 SPACES
 OFFICE: 1:4 REDUCTION = 2 SPACES
 COMMERCIAL: 1:4 REDUCTION = 2 SPACES

PARKING REQUIRED (W/ LOWER OF CODE OR MAXIMUM NUMBER OF PARKING REQUIRED):

RESIDENTIAL: 412 - 62 = 350 SPACES
 HOTEL: 71 - 9 = 62 SPACES
 BALLROOM/CONFERENCE CENTER: 108 - 12 = 96 SPACES
 OFFICE: 33 - 2 = 31 SPACES
 COMMERCIAL: 65 - 16 = 49 SPACES

TOTAL PARKING SPACES REQUIRED AFTER REDUCTIONS: 588 SPACES

PARKING PROVIDED = 638 SPACES TOTAL
 - 499 SPACES PROVIDED ABOVE GROUND
 - 439 SPACES PROVIDED BELOW GROUND

PARKING SUMMARY:

- REQUIRE PARKING BEFORE REDUCTIONS = 689 SPACES
- PARKING PROVIDED = 638 SPACES
- REQUIRE PARKING AFTER REDUCTIONS = 588 SPACES
- * REDUCTIONS INCLUDE PROXIMITY TO LIGHT RAIL OR BICYCLE PARKING PROVIDED, WHICH EVER IS LESS

BICYCLE PARKING

	LONG TERM	SHORT TERM
RESIDENTIAL	374 x 1 S/U = 374 SPACES (PROVIDED AT BASEMENT PARKING LEVELS)	374 X 0.1 S/U = 37 SPACES (@ LEVEL B1)
HOTEL	373 ROOMS / 20 = 19 SPACES	373 ROOMS / 20 = 19 SPACES
BALLROOM CONFERENCE	10,801 SF / 700 SF/S = 15 SPACES	10,801 SF / 350 SF/S = 31 SPACES
OFFICE	33,498 SF / 5,000 SF/S = 7 SPACES	33,498 SF / 10,000 SF/S = 3 SPACES
COMMERCIAL	65,074 SF / 2,000 SF/S = 33 SPACES	65,074 SF / 2,000 SF/S = 33 SPACES
TOTAL	448 SPACES	123 SPACES

- PENTHOUSE AMENITIES
- PENTHOUSE
- CONDOMINIUMS
- HOTEL ROOM
- HOTEL LOBBY/AMENITIES
- RETAIL
- CONFERENCE CENTER/OFFICE
- PARKING
- BASEMENT PARKING

GENERAL INFORMATION

PROJECT ADDRESS:
 811 WEST OLYMPIC BLVD.
 LOS ANGELES, CA 90015
 APN # 5138003014
 ZONING: C2-4D
 LOT SIZE: 37,030.76 SF
 AREA FROM PROPERTY LINE TO CENTERLINE OF STREET: 23,093.13 SF
 TOTAL AREA FOR TFAR CALCULATION: 60,126 SF
 FAR: 13.1
 MAXIMUM ALLOWABLE BUILDABLE AREA: 60,126 SF x 13 = 781,638 SF
 PROPOSED BUILDABLE AREA: 779,173 SF

BUILDING SETBACKS
 FRONT: 0' / 0'
 SIDE: 0' / 0'
 REAR: 0' / 0'

BUILDING HEIGHT
 - MAXIMUM HEIGHT - NO LIMIT
 - PROPOSED HEIGHT - 742' - 11" (ABOVE GROUND)

AREAS PROJECTED BEYOND PROPERTY LINE:
 - LEVEL 13TH
 - BALCONY AT BALLROOM/CONFERENCE ROOM = 138 SF (5 FEET PROJECTION TOWARDS OLYMPIC BLVD)
 - BALCONY AT CONDOMINIUM AMENITY POOL = 148 SF (5 FEET PROJECTION TOWARDS OLYMPIC BLVD)

RESIDENTIAL UNIT SUMMARY:
 24 = STUDIO UNITS
 200 = 1 BEDROOM UNITS
 94 = 2 BEDROOM UNITS
 56 = 2 BEDROOM LUXURY UNITS
 30 = 3 BEDROOM - TWO STORY PENTHOUSE UNITS
 374 = TOTAL RESIDENTIAL UNITS

HOTEL GUEST ROOMS:
 373 GUEST ROOMS

SQUARE FOOTAGE SUMMARY:
 PENTHOUSE AMENITIES = 9,556 SF
 PENTHOUSE = 68,926 SF
 LUXURY CONDOMINIUMS = 73,700 SF
 CONDOMINIUMS = 293,105 SF
 HOTEL GUEST ROOMS = 216,065 SF
 CONDO AMENITIES = 6,448 SF
 BALLROOM/CONFERENCE CENTER = 10,801 SF
 OFFICE = 33,498 SF
 COMMERCIAL/RETAIL = 65,074 SF

TOTAL = 779,173 SF
 MAXIMUM ALLOWED PER TFAR = 781,610.57 SF

** FOR "FAR" ALLOCATION AT DIFFERENT LEVELS, PLEASE REFER TO DIAGRAM SHEETS "G0.12, G0.13 & G0.14"

OPEN SPACE

OPEN SPACE REQUIRED - 42,650 SF
 - STUDIO W/ KITCHEN - 24 UNITS x 100 SF = 2,400 SF
 - CONDOMINIUMS (1 BEDROOM) - 200 UNITS x 100 SF = 20,000 SF
 - CONDOMINIUMS (2 BEDROOMS) - 64 UNITS x 125 SF = 8,000 SF
 - LUXURY CONDOMINIUMS (2 BEDROOMS) - 56 UNITS x 125 SF = 7,000 SF
 - PENTHOUSE CONDOMINIUMS (3 BEDROOMS) - 30 UNITS x 175 SF = 5,250 SF

ALLOWED OPEN SPACE ALLOCATION
 - OUTDOOR/OPEN TO THE SKY: 42,650 SF x 75% = 31,987.5 SF
 - INDOOR/COVER PUBLIC SPACES: 42,650 x 25% = 10,662.5 SF

OPEN SPACE PROVIDED - 73,848 SF
PUBLIC OPEN SPACES:

Level 13	Outdoor:	11,370 SF;	Indoor:	8,112 SF
Level 56	Outdoor:	13,703 SF;	Indoor:	5,085 SF
Level 57	Outdoor:	721 SF;	Indoor:	3,749 SF
Total:	Outdoor:	25,794 SF;	Indoor:	16,946 SF

PRIVATE OPEN SPACES:

Level 32 - 35 (x 4 Levels)	Outdoor:	400 SF;	Indoor:	1,010 SF
Level 36 - 47 (x 12 Levels)	Outdoor:	400 SF;	Indoor:	1,010 SF
Level 48 - 51 (x 4 Levels)	Outdoor:	194 SF;	Indoor:	471 SF
Level 52	Outdoor:	431 SF;	Indoor:	1,195 SF
Level 53	Outdoor:	366 SF;	Indoor:	952 SF
Level 54	Outdoor:	431 SF;	Indoor:	1,195 SF
Level 55	Outdoor:	366 SF;	Indoor:	952 SF
Total:	Outdoor:	8,770 SF;	Indoor:	22,338 SF

REQUIRED vs. PROVIDED OPEN SPACES:
 - OUTDOOR/OPEN TO THE SKY = REQUIRED 31,987.5 SF PROVIDED 34,564 SF DIFFERENCE -2,991 SF
 - INDOOR/COVER OPEN SPACES = REQUIRED 10,662.5 SF PROVIDED 39,284 SF DIFFERENCE -28,621 SF

*** FOR OPEN SPACE ALLOCATION AT DIFFERENT LEVELS, PLEASE REFER TO DIAGRAMS ON SHEET "G0.11"

Source: Nardi Associates LLP Architects, 2015.

2. INITIAL STUDY CHECKLIST

LEAD CITY AGENCY Los Angeles City Planning Department	COUNCIL DISTRICT 14, Jose Huizar	DATE June 2016
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RESPONSIBLE AGENCIES
Southern California Air Quality Management District; Los Angeles Regional Water Quality Control Board

PROJECT TITLE/NO. Olympic Tower L.A.	CASE NO. ENV-2015-4558-EIR
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PREVIOUS ACTIONS CASE NO. N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.
---	--

PROJECT DESCRIPTION:
See Section 1 (Project Description).

ENVIRONMENTAL SETTING:
See Section 1 (Project Description).

PROJECT LOCATION
813-815 W. Olympic Boulevard; 947-951 S. Figueroa Street, Los Angeles 90015

PLANNING DISTRICT Central City Community Plan Area	STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED 2003
--	--

EXISTING ZONING C2-4D	MAX. DENSITY ZONING C2:	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
PLANNED LAND USE & ZONE Commercial; C2-4D	MAX. DENSITY PLAN N/A	
SURROUNDING LAND USES Hotel, parking, residential, commercial/retail, entertainment	PROJECT DENSITY Proposed Floor-Area Ratio: 13:1	

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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



Signature

Associate Planner

Title

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

- 7) **Supporting Information Sources:** A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - 1) The significance criteria or threshold, if any, used to evaluate each question; and
 - 2) The mitigation measure identified, if any, to reduce the impact to less than significance.

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

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

BACKGROUND

PROPONENT NAME Olymfig26, LLC	PHONE NUMBER 213-765-7700
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PROPONENT ADDRESS
1433 Griffith Avenue, Los Angeles, CA 90021

AGENCY REQUIRING CHECKLIST City of Los Angeles Planning Department	DATE SUBMITTED June 2016
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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
I. Aesthetics. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state-designated scenic highway?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response a:

A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is in an urbanized portion of Los Angeles, and topographically relatively flat. The Project would construct a new 742-foot tall high-rise tower, thus substantially increasing the building heights on the Site from the existing car wash, having a potential adverse effect on a scenic vista. Therefore, this potential impact will be analyzed in the EIR.

Response b:

A significant impact would occur only where scenic resources would be damaged or removed by the project. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway. The adjoining property to the north of the Site contains the Figueroa Hotel, a potential historic structure. Therefore, the Proposed Project could have a potential impact on a potential historic building and this potential will be analyzed in the EIR.

Response c:

A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the area. The Project would increase the building heights on the Site from existing uses and would introduce new architectural elements to the area. Therefore, this issue will be analyzed in the EIR.

Response d:

A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Artificial Light

An adverse impact would occur if the project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, exterior signage, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. Nevertheless, aesthetic impacts to the nearby residential properties may result due to excessive illumination at the Project Site. Therefore, this issue will be analyzed further in the EIR.

Glare

An adverse impact would occur if the project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The potential exists for glass or other shiny building materials to cause glare impacts at nearby residential uses. Therefore, this issue will be analyzed further in the EIR.

Shade/Shadow

The analysis of the Proposed Project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as

pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. The Project would construct a new 742-foot tall tower on the Site. The City of Los Angeles requires a shade/shadow evaluation for any new building over 60 feet in height.³ Therefore, a shade/shadow analysis will be included in the EIR.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. Agricultural And Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest Range and 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 the 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 by Public Resources Code section 122220(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"/>

³ City of Los Angeles, *CEQA Thresholds Guide, 2006, Section A (Aesthetics and Visual Resources), Part 4.*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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"/>

Responses a-e:

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with a building and is in a highly urbanized area. The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the Farmland Mapping and Monitoring Program.⁴ The Site is zoned commercial. No Williamson Act Contract applies to the Site. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁴ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf>, March 8, 2016.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
quality standard including releasing emissions which exceed quantitative thresholds for ozone precursors?				
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" 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"/>

Response a:

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM₁₀, and PM_{2.5}). As such, the project would be subject to the SCAQMD’s AQMP. The 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.⁵ With regard to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP, and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with the City’s General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. As a result, project development could have an adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, this issue will be analyzed further in the EIR.

⁵ SCAG is the federally designated metropolitan planning organization (MPO) for the southern California region.

Response b:

A project would result in a significant air quality impact if project-related emissions exceed federal, state or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction and operation of the Project would result in an increase in uses which has the potential to generate emissions which could exceed federal, state, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in the EIR.

Response c:

A significant impact would occur if the proposed project would result in a cumulatively considerable net increase in a federal or state non-attainment pollutant. With regard to determining the significance of the Project's contribution to regional emissions, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal or state non-attainment pollutant. Therefore, this issue will be analyzed further in the EIR.

Response d:

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.⁶ Sensitive receptors in the Project vicinity include residences to the east across Figueroa Street. The Project could expose these sensitive receptors to substantial pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in the EIR.

Response e:

A significant impact would only occur if the project would generate substantial odors. The SCAQMD's *CEQA Air Quality Handbook* identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any of the uses identified by the SCAQMD as being associated with odors. While the Project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402

⁶ *South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.*

(Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project’s long-term operations phase to a less than significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the Project’s short-term construction phase to a less than significant level. Therefore, further evaluation of this issue is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. Biological Resources. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation	<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
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Plan, or other approved local, regional, or state habitat conservation plan?

Response a:

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with a building, paving, and minimal landscaping. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, a less than significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Response b:

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. There are no riparian areas located on or adjacent to the Project Site.⁷ Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response c:

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.⁸ Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response d:

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with an existing building and other hard surfaces and currently does not interfere substantially with the movement of any

⁷ NavigateLA, Water, Lakes, and Streams layer: <http://navigatela.lacity.org/navigatela/>, March 11, 2016.

⁸ U.S. Fish & Wildlife Service, National Wetlands Inventory: <http://www.fws.gov/wetlands/data/mapper.HTML>

native resident or migratory birds. The Site is located within an urban area that is highly disturbed and which contains numerous high-rise buildings. The nearest location that contains vegetation with the potential for supporting migratory bird and/or wildlife use is MacArthur Park, located approximately one mile to the northwest. The Project would develop a 742-foot high-rise tower on the Site. Although buildings of this height could potentially interfere with bird movement, the presence of several buildings of a similar height in the immediate vicinity would generally act as a discouragement to major bird migration. Additionally, Downtown Los Angeles is not known as being located within a significant bird migration route. No bodies of water exist on the Site to provide habitat for fish. As such, Project implementation would neither interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors nor would it impede the use of native wildlife nursery sites. Therefore, Project impacts would be less than significant and further evaluation of this issue in an EIR is not required.

Response e:

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to a previously developed site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica* var. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).⁹ No City-protected trees are present on the Project Site. The Project would remove the existing non-native trees on the Site and would provide replacement per applicable City requirements. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Response f:

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with buildings, paving, and minimal landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area.¹⁰ Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

⁹ City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.

¹⁰ NavigateLA, Significant Ecological Area layer: <http://navigatela.lacity.org/navigatela/>, March 11, 2016.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?	<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 type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

Response a:

Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The State Office of Historic Preservation recommends that properties over 45 years of age be evaluated for their potential as historic resources. The existing car wash on the Project Site was built in approximately 1981 and possesses no unique distinguishing characteristics or associations that would bestow upon it a level of potential historical significance. However, the adjoining property to the north contains the Figueroa Hotel, constructed in 1926 and known to be a building of potential historical significance. Although construction of the Proposed Project would not directly alter any of the hotel’s historical characteristics, the potential exists for the Proposed Project to adversely impact the hotel. Accordingly, this issue will be analyzed in the EIR.

Response b:

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources which fall under either of these categories. The Project Site and

immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.¹¹ The Project Site is located in a highly urbanized area of the Central City Community Plan Area of the City of Los Angeles, and has been disturbed by past development activities. The Project includes subgrade preparation and excavation for the six-level subterranean parking garage. Thus, the potential exists for the accidental discovery of unknown archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity.

Under California Public Resources Code Section 21083.2, development projects that involve excavations are required to implement the following measures:

- If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:
 - The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
 - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
 - The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834
- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

¹¹ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

- A covenant and agreement binding the Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Compliance with these requirements would ensure that the Project would have a less than significant impact with respect to archaeological resources and no further evaluation of this issue in an EIR is required.

Response c:

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project site is located in the Central City Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been previously graded and is currently developed with a car wash. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹² Although no paleontological resources are known to exist on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during subgrade excavation for the parking garage.

Under California Public Resources Code Sections 5097.5 and 30244, development projects that involve excavations are required to implement the following measures:

- If any paleontological materials are encountered during the course of project development, all further development activities in the vicinity of the materials shall halt and:
 - The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact;
 - The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource;
 - The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report; and
 - Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

¹² *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

- Prior to the issuance of any building permit, the Applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Compliance with these requirements would ensure that, if any such resources are found during construction of the Project, they would be handled according to the proper regulations, and impacts to potential paleontological resources that may exist beneath the Project Site would be less than significant. No further evaluation of this issue in an EIR is required.

Response d:

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and developed with an existing building. The likelihood of encountering human remains on the Project Site is minimal. However, during the construction phase and excavation of the subterranean parking levels, there is a possibility that human remains could be encountered, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Under California Health and Safety Code Section 7050.5 and Native American Heritage Commission (NAHC) regulations (Public Resource Code Section 5097), development projects that involve excavations are required to implement the following measure:

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - Stop excavation immediately in the vicinity of the remains and contact the County Coroner at:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
 - The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission;
 - The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American;

- Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods;
- If the most likely descendent does not make recommendations within 48 hours, the Applicant shall reinter the remains in an area of the property secure from further disturbance, or;
- If the Applicant does not accept the most likely descendant’s recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Through compliance with these requirements, potential Project impacts related to the disturbance of unknown human remains would be less than significant. No further evaluation of this issue in an EIR is required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response a.i:

Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains.

The Site is not within an Alquist-Priolo Fault Zone or a Fault Rupture Study Zone.¹³ The Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC. Nonetheless, as the Site is located in a seismically active region, potential impacts associated with fault rupture will be analyzed further in an EIR.

¹³ City of Los Angeles, ZIMAS Parcel Profile Reports, website: <http://zimas.lacity.org>, March 14, 2016..

Response a.ii:

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Southern California is active seismic region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would conform to all applicable provisions of the City Building Code and the UBC with respect to new construction. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Nonetheless, as the Site is located in a seismically active region, this potential impact from ground shaking will be analyzed further in an EIR.

Response a.iii:

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone.¹⁴ The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area, but there are some areas nearby that are susceptible to liquefaction.¹⁵ The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Nonetheless, because the Project Site is near susceptible areas, potential impacts associated with liquefaction will be analyzed further in an EIR.

Response a.iv:

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is topographically

¹⁴ City of Los Angeles, *ZIMAS Parcel Profile Report*, website: <http://zimas.lacity.org>, March 14, 2016.

¹⁵ City of Los Angeles, *Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B*.

level and is not classified as a landslide hazard zone in the CGS Seismic Hazards Map.¹⁶ The Project Site is also not identified by ZIMAS as being within a landslide hazard zone.¹⁷ Therefore, a less than significant impact would occur and further evaluation of this issue in an EIR is not required.

Response b:

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is located in an urbanized portion of Los Angeles and is currently developed with an existing building. Any topsoil that may exist on the Site was previously blended with other on-site soils during previous site preparation/grading activities. As such, development of the Project would not result in substantial loss of topsoil. Construction activities such as grading and excavation could create a potential for soil erosion. The potential for soil erosion on the Project Site is low due to the generally level topography of the Project Site and the presence of off-site drainage facilities. Project construction would require the removal of existing pavement and grading earth and excavation. Conformance with City Building Code Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the Los Angeles Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15). Therefore, Project impacts related to soil erosion during construction, with the inclusion of the proposed design features, are anticipated to be minimal. The potential for soil erosion during project operation would be relatively low due to the urbanized nature of the Project site and area and the generally level topography of the Site. In addition, the Project Site will be improved with new buildings, hardscape and landscape. Therefore, a less than significant impact would occur and further evaluation of this issue in an EIR is not required.

Response c:

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The Project Site is located in an urbanized portion of Los Angeles and is currently developed with an existing building. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Since the Project may require dewatering for construction of the subterranean parking, the potential for subsidence may occur. Therefore, this issue and soil suitability will be analyzed further in an EIR.

¹⁶ California Geologic Survey, Seismic Hazard Zones: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf.

¹⁷ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

Response d:

A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. Although the Project must comply with building regulations set forth by the California Building Code, the potential for an impact still exists. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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VII.Greenhouse Gas Emissions. Would the project:

- | | | | | | |
|----|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. | Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment? | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Responses a and b:

Construction and operation of the Project has the potential to generate greenhouse gas emissions because it will result in new construction and uses, which may directly or indirectly have a significant impact on the environment. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project’s generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input checked="" 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 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 the people residing or working in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response a:

A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that

could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. During operation, residential, retail, hotel, and office uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in an EIR.

Response b:

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. As the car wash occupying the Project Site was constructed in 1981, it is not likely to contain asbestos-containing-materials (ACMs) or lead-based-paint (LBP). However, polychlorinated biphenyls (PCBs) and/or hazardous petroleum products could potentially be present at the Site. Therefore, construction activities may have the potential to expose construction workers and sensitive receptors in the Project area to hazards associated with accidental exposure to PCBs and/or petroleum products. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project Site is located within 0.25 mile of the following schools:¹⁸

- Los Angeles Universal Pre-School, 888 S. Figueroa Street #800, approximately 900 feet northeast of the Site; and
- Kid City Hope Place (After School Program), 1021 S. Hope Street, approximately 1,100 feet southeast of the Site.

The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. However, since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, further analysis of this issue in an EIR is required.

Response d:

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A

¹⁸ *NavigateLA, Schools Layer: <http://navigatela.lacity.org/navigatela/>*

significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. A leaking underground storage tank utilized for gasoline was formerly located on the Project Site as part of a former service station at the car wash. Removal of the tank and remediation of the contaminants was undertaken and the location was deemed clean and the case closed in 2013.¹⁹ However, the potential exists for any number of hazardous materials sites near the Project Site, including sites up-gradient, to be listed according to Government Code Section 65962.5 which could create a significant hazard to the public. Therefore, this issue will be analyzed further in an EIR.

Responses e and f:

A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a public airport or private airstrip. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response g:

A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction and operation activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in an EIR.

Response h:

A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.²⁰ The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element.²¹ Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

¹⁹ CA State Water Resources Control Board: <http://geotracker.waterboards.ca.gov/>

²⁰ City of Los Angeles, ZIMAS Parcel Profile Report, website: <http://zimas.lacity.org>.

²¹ City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in 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 plain 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 plain 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, inquiry 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"/>

Response a:

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the City's Low Impact Development Ordinance and/or Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the development of a mixed-use high-rise tower on land that is currently fully developed and completely paved. The Project would not alter the existing surface water runoff drainage pattern, would not reduce rainfall absorption at the Site, and would not result in a net increase of rates of stormwater discharge which may exceed water quality standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements would be less than significant and further evaluation in an EIR is not required.

Response b:

A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City's existing water supply and infrastructure. In addition, the Project would not increase the amount of impervious surface area located on the Project Site upon completion of project construction. Although construction of the Project would include excavation and could possibly require dewatering at the Site, the amount of groundwater infiltration likely to occur would be minimal given the small area and relatively shallow depth of the proposed excavation (approximately 70 feet below grade). Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response c:

A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. There are no natural watercourses on the Project Site. The Site is currently fully developed. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. However, compliance with the requirements of the mandated construction Stormwater Pollution Prevention Plan (SWPPP) would reduce the occurrence of erosion and siltation during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response d:

A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns

of the Site and off-site flows, thereby having a potential impact. However, compliance with the requirements of the mandated construction Stormwater Pollution Prevention Plan (SWPPP) would reduce the amount of additional stormwater runoff from the Project Site during construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response e:

A significant impact may occur if a project would increase the volume of stormwater runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the proposed project would introduce substantial new sources of polluted runoff. Construction of the project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. However, compliance with the requirements of the mandated construction and operation Stormwater Pollution Prevention Plans (SWPPP), as well as with the requirements of the City's Low Impact Development Ordinance and/or SUSMP, would reduce the amount of additional stormwater runoff from the Project Site and the introduction of pollutants to stormwater runoff during construction and operation to the maximum extent practicable. Development of the Proposed Project would not increase overall stormwater runoff volume as the Project Site is currently completely covered with impervious surfaces. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response f:

As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. However, compliance with the requirements of the mandated construction and operation Stormwater Pollution Prevention Plans (SWPPP), as well as with the requirements of the City's Low Impact Development Ordinance and/or SUSMP, would reduce the introduction of contaminants to stormwater runoff during Project construction and operation to the maximum extent practicable. Therefore, this potential impact would be less than significant and further evaluation in an EIR is not required.

Response g-h:

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods.²² The Site is not located within a City-designated 100-year or 500-year flood plain.²³ As the Site is located in an area of minimal flooding, the Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain

²² *NavigateLA, FEMA Flood Hazard layer: <http://navigatela.lacity.org/navigatela/>, March 15, 2016.*

²³ *City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.*

any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required.

Response i:

A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. The Project Site is not located within a potential inundation area resulting from the failure of a dam or levee. As such, no impact would occur and no further analysis of this issue is required.

Response j:

A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, and is located at least 12 miles from the Pacific Ocean and is not near any major water bodies. Therefore, there is no impact associated with seiches or tsunamis at the Site. In addition, the Site is in an urbanized portion of the City of Los Angeles, and is relatively flat, thereby limiting the potential for inundation by mudflow. No further analysis of this issue is required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. Land Use And Planning. Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response a:

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is less than one acre in size and is

currently developed with commercial uses. Redevelopment of the Site with the Proposed Project would not physically divide a community. Therefore, no impact would occur and no further analysis of this issue is required.

Response b:

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions by the City which could conflict with land use plans, policies or regulations, leading to a potentially significant impact. The EIR will provide additional analysis to assess the potential impact from the project’s consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the Central City Community Plan and Los Angeles Sports And Entertainment District Specific Plan) or regional plans and policies (such as the SCAQMD and Metro CMP).

Response c:

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site is currently developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

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

Response a:

A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used

or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area,²⁴ or a City-designated Mineral Resource Zone 2 Area (MRZ-2).²⁵ The nearest oil area is the Los Angeles Downtown Oil Field located approximately 600 feet to the south of the Project Site. Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource and further evaluation is not required.

Response b:

A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address “minerals and other natural resources.” According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area around the Project Site has been developed with structures and is inaccessible for mining extraction.²⁶ Furthermore, the Project Site is developed and located in an urbanized area. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. Noise. Would the project result in:

a. Exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

²⁴ State of California, Department of Conservation, Division of Oil, Gas & Geothermal Resources Well Finder: <http://maps.conservation.ca.gov/doggr/index.html#close>, accessed March 25, 2016.

²⁵ City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

²⁶ Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
in the project vicinity above levels existing without the project?				
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" 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"/>

Response a:

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Construction would require the use of construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City’s Noise Ordinance. Existing on-site noise sources include the existing car wash, retail, and restaurant uses. The Project would increase the activities that would occur on the Site and noise levels from on-site sources also have the potential to increase during Project operation. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, the potential impact from these noise increases will be analyzed further in an EIR.

Response b:

A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise which could have a potentially significant impact. During operation, ground-borne vibration may also occur from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact may occur if the operation would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response d:

A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project or on a periodic basis during the operation of the proposed project. As discussed above, construction activity has the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project. As discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the project area to excessive noise levels from an airport use. Therefore, no impact would occur and further evaluation of this issue is not required.

Response f:

This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question VIII(f), there are no private airstrips in the vicinity of the Site. Therefore, no impact would occur and further evaluation of this issue is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. Population And Housing. Would the project:

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

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

Response a:

A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population which could induce potentially significant population growth. Therefore, this issue will be further analyzed in an EIR.

Response b:

A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would not displace any housing since there is no housing on the Site. Further, the Project would develop residential units. Therefore, no impact would occur and further evaluation in an EIR is not required.

Response c:

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. The Project would not displace people necessitating the construction of replacement housing elsewhere. There is no housing on the Site. Therefore, no impact would occur and further evaluation in an EIR is not required.

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

a. Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response a:

A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. The Project is served by:

- Fire Station No. 10, located at 1335 S. Olive Street, approximately 0.3 mile from the Site.

The Project would increase the intensity of development at the Project Site, which may require the provision of new facilities to maintain acceptable service ratios. This potential impact of the Project on fire protection services will be analyzed in the EIR.

Response b:

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is within the LAPD’s Central Community Police Station service area, located at 251 E. 6th Street.²⁷ The Project would increase the intensity of

²⁷ LAPD: http://www.lapdonline.org/central_community_police_station

development at the Project Site, resulting in a potentially significant impact on police protection services. This will be analyzed in the EIR.

Response c:

A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area, thus necessitating new school facilities. The potential impact of the Project on school facilities will be analyzed in the EIR.

Response d:

A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. Therefore, there could be a potentially significant impact from new parks or recreation facilities. The EIR will evaluate the Project's impacts on park facilities.

Response e:

A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the Los Angeles Public Library (LAPL). The Central Library located at 630 W. 5th Street is the closest library to the Site. Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. Therefore, the EIR will evaluate the Project's potential impacts upon library facilities.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. | Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Response a:

A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new residential uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV, Parks). While on-site open space and recreational amenities would be included, the Project has the potential to increase demands upon several public park facilities located within the project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

Response b:

As discussed above, the Project has the potential to increase demands upon recreational facilities that may in turn require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 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 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 type="checkbox"/>	■
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	■	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<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 type="checkbox"/>	■	<input type="checkbox"/>	<input type="checkbox"/>

Response a:

A significant impact would occur if the project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F; by 0.020 or more when the final LOS is D; or by 0.040 or more when the final LOS is C. It is unknown at this time whether the Project may result in potentially significant traffic impacts during operation and construction. The potential impacts of the Project will be evaluated in a traffic study in accordance with the assumptions, methodology, and procedures approved by LADOT and will be included in the EIR.

Response b:

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (MTA) thresholds are exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision-makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. However, there could be an impact if levels of service standards are exceeded. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses. Furthermore, as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Response d:

A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. In addition, there could be a potentially significant impact if the driveway width and queuing length result in inadequate space to accommodate the vehicles for the Project. Therefore, this issue will be analyzed further in an EIR.

Response e:

A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore,

the EIR will provide additional analysis to assess the potential of the Project to result in impacts on emergency access.

Response f:

A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. There are transit stops nearby (Metro Bus) on Olympic Boulevard and Figueroa Street which could be impacted by the Project. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. Utilities and Service Systems. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

Response a:

A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the state's wastewater treatment requirements which, in the project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The Project's introduction of new residential, hotel, office, and commercial uses could result in the potential to exceed wastewater treatment requirements of the LARWQCB. This potentially significant impact will be analyzed in the EIR.

Response b:

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that new facilities would be needed, the construction of which would cause significant environmental effects. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. The potentially significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site will be analyzed in the EIR.

Response c:

A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The Project Site is currently fully developed and covered with impervious surfaces. Development of the Proposed Project would not increase the amount of impervious surface area at the Site and, consequently, would not increase the volume of stormwater runoff from the Site. Therefore, this impact would be less than significant and no further evaluation of this issue is required in an EIR.

Response d:

A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to increase water consumption as compared to the existing uses on the Site, resulting in a potentially significant impact if new or expanded entitlements are needed. Given the Project's size, a Water Supply Assessment by the Los Angeles Department of Water and Power (LADWP) will be conducted to evaluate the water supply's availability to serve the Project. Any potential impacts with respect to water supply will be analyzed within the EIR.

Response e:

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, this potential impact related to wastewater treatment plant capacity and availability will be analyzed in the EIR.

Response f:

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Since the Project will result in an increase in residents and users, there could be a potentially significant impact if those solid waste disposal needs are not accommodated by a landfill. Therefore, the potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

Response g:

Solid waste management is guided by the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, a less than significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. Mandatory Findings Of Significance.

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of 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).
- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Response a:

Based on the analysis contained in this Initial Study, the project has the potential to result in significant impacts with regard to the issues addressed herein. Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts.

Response b:

The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to aesthetics, air quality, geology and soils, greenhouse gas emissions, hazards/hazardous materials, land use and planning, noise, population and housing, public services, transportation and traffic, and utilities and service systems resulting from the project in conjunction with the applicable related projects will be

analyzed and documented in an EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

Response c:

As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

As noted above, the lead agency has determined that the proposed project may result in a significant effect on the environment, and an environmental impact report is required.

PREPARED BY	TITLE	TELEPHONE	DATE
Sergio Ibarra	City Planner	213-978-1333	June 2016