Our Lady of Mt. Lebanon Project
Case Number: ENV-2019-1857-EIR

**Project Location:** 331–333 S. San Vicente Boulevard and 8531–8555 W. Burton Way, Los Angeles, CA 90048 (Project Site)

**Community Plan Area:** Wilshire

**Council District:** 5—Koretz

**Project Description:** The Our Lady of Mt. Lebanon Project (Project) includes: (1) the development of a 19-story, multi-family residential building with 153 apartment units (including 17 Very Low Income units) and a maximum height of 225 feet; (2) the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral of Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral; and (3) the removal of three existing ancillary church buildings, including the parish rectory, a building with offices and meeting rooms and the social hall, and their replacement with a new three-story building that includes offices, meeting rooms and a multi-purpose room.

As part of the residential component of the Project, approximately 16,800 square feet of open space would be provided on-site. The Project includes a total of 397 vehicle parking spaces, including 252 residential parking spaces and 145 church parking spaces, within a five-level subterranean parking structure. To accommodate excavation and construction activities for the subterranean parking structure, the existing cathedral (other than the front façade, which would remain on the Project Site) would be deconstructed and temporarily relocated off-site. Upon completion of the subterranean parking structure and the partial construction of the new residential and church buildings, the cathedral would be reassembled and rehabilitated in its approximate original location.

Overall, the Project would result in a net increase of approximately 160,862 square feet of floor area on the Project Site. Upon completion of the Project, the total floor area of the buildings on the Project Site would be approximately 180,080 square feet, with a floor area ratio (FAR) of 4.99:1.

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

**PREPARED BY:**
Eyestone Environmental

**APPLICANT:**
Bishop A. Elias Zaidan, Successor Trustee of Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral–Los Angeles Real Estate Trust

August 2019
# INITIAL STUDY

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INITIAL STUDY

1. INTRODUCTION

An application for the proposed Our Lady of Mt. Lebanon Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (City), through its Department of City Planning, as lead agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an initial study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction and operation of the proposed Project. It has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an environmental impact report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An initial study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the lead agency shall prepare a negative declaration. If the initial study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a mitigated negative declaration is appropriate. If the initial study concludes that neither a negative declaration or mitigated negative declaration is appropriate, an EIR is normally required.¹

¹ State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the lead agency when there is substantial evidence that the project may cause a significant effect on the environment: "(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."
1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of an initial study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the lead agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the outset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study has determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

Therefore, a notice of preparation (NOP) will be prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed Project. The NOP and Initial Study will be circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the Draft EIR. After the close of the 30-day review and comment period, the lead agency will continue the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.
1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability will be prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability will be circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues will be prepared.

1.3.3 Final EIR

The lead agency will then prepare a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body will then consider the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

If the Project is approved, then within five days of the action, the lead agency will file a Notice of Determination with the County Clerk. The Notice of Determination is normally posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the project approval under CEQA. The ability to challenge the project approval in court may be limited to those persons who objected to the approval of the Project, and to issues that were presented to the lead agency by any person, either orally or in writing, during the public comment period.
2. EXECUTIVE SUMMARY

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<th>PROJECT TITLE</th>
<th>OUR LADY OF MT. LEBANON PROJECT</th>
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<td>ENVIRONMENTAL CASE NO.</td>
<td>ENV-2019-1857-EIR</td>
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<td>RELATED CASES</td>
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<td>[Q]R4-1-O</td>
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<td>STAFF CONTACT</td>
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<td>LOS ANGELES, CA 90012</td>
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<td>PHONE NUMBER</td>
<td>(213) 847-3674</td>
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<td>EMAIL</td>
<td><a href="mailto:MINDY.NGUYEN@LACITY.ORG">MINDY.NGUYEN@LACITY.ORG</a></td>
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<tr>
<th>APPLICANT</th>
<th>BISHOP A. ELIAS ZAIDAN, SUCCESSOR TRUSTEE OF OUR LADY OF MT. LEBANON–ST. PETER MARONITE CATHOLIC CATHEDRAL–LOS ANGELES REAL ESTATE TRUST</th>
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<tbody>
<tr>
<td>ADDRESS</td>
<td>333 S. SAN VICENTE BOULEVARD</td>
</tr>
<tr>
<td></td>
<td>LOS ANGELES, CA 90048</td>
</tr>
<tr>
<td>PHONE NUMBER</td>
<td>(310) 275-6634</td>
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PROJECT DESCRIPTION

The Our Lady of Mt. Lebanon Project (Project) includes: (1) the development of a 19-story, multi-family residential building with 153 apartment units (including 17 Very Low Income units) and a maximum height of 225 feet; (2) the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral of Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral, with a resulting floor area of approximately 7,790 square feet; and (3) the removal of three existing ancillary church buildings, including the parish rectory, a building with offices and meeting rooms and a social hall, with an aggregate floor area of 12,370 square feet, and their replacement with a new three-story building with approximately 23,649 square feet of ancillary church uses, including offices, meeting rooms and a multi-purpose room. The Project Site consists of five lots with a total of 42,285 square feet (0.97 acre) of land, located in the Wilshire Community Plan area of the City of Los Angeles (City).
As part of the residential component of the Project, approximately 16,800 square feet of open space would be provided on-site in accordance with the requirements of the Los Angeles Municipal Code (LAMC). The Project includes a total of 397 vehicle parking spaces, including 252 residential parking spaces and 145 church parking spaces, within a five-level subterranean parking structure. To accommodate excavation and construction activities for the subterranean parking structure, the existing cathedral (other than the front façade, which would remain on the Project Site) would be deconstructed and temporarily relocated off-site. Upon completion of the subterranean parking structure and the partial construction of the new residential and church buildings, the cathedral would be reassembled and rehabilitated in its approximate original location.

Overall, the Project would result in a net increase of approximately 160,862 square feet of floor area on the Project Site. Upon completion of the Project, the total floor area of the buildings on the Project Site would be approximately 180,080 square feet, with a floor area ratio (FAR) of 4.99:1.

(For additional detail, see Section 3. Project Description).

ENVIRONMENTAL SETTING

The Project Site is bounded by an alley to the north, Burton Way to the south, San Vicente Boulevard to the east, and Holt Avenue to the west. The 42,285-square-foot (0.97-acre) Project Site is currently developed with the following: a one-story, 6,848-square-foot cathedral; three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory, a one-story, 5,426-square-foot social hall, and a three-story, 4,424-square-foot building with offices and meeting rooms; and a surface parking lot. The Project Site is located within the planning boundary of the Wilshire Community Plan area. The Project Site has a General Plan land use designation of High Medium Residential and is zoned [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling).

Land uses located adjacent to the Project Site include an 11-story residential condominium building to the north (across the alley), a three-story retail building and parking structure to the east across San Vicente Boulevard, two- and five-story, multi-family residential buildings to the south across Burton Way, and a five-story, multi-family residential building to the west across Holt Avenue. Other nearby uses include the Cedars-Sinai Medical Center and Beverly Center to the north and additional residential and commercial uses. The uses surrounding the Project Site have various land use and zoning designations, including General Commercial, Neighborhood Office Commercial, and Medium and High Medium Residential with zoning designations of C2-1VL-O, CR-1VL-O, (T)(Q)C2-2D-O, R3-1-O and [Q]R4-1-O.

Major arterials providing direct or indirect access to the Project Site include San Vicente Boulevard and Burton Way.

(For additional detail, see Section 3. PROJECT DESCRIPTION).
OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED
(e.g., permits, financing approval, or participation agreement)

To be determined.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Consultation has begun and is ongoing.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics ☐ Agriculture & Forestry Resources ☐ Air Quality ☐ Biological Resources ☒ Cultural Resources ☒ Energy ☐ Geology/Soils ☒ Greenhouse Gas Emissions ☒ Hazards & Hazardous Materials ☒ Public Services ☐ Recreation ☒ Transportation ☐ Tribal Cultural Resources ☒ Utilities/Service Systems ☐ Wildfire ☒ Mandatory Findings of Significance
DETERMINATION

(To be completed by the 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.

Mindy Nguyen
PRINTED NAME

City Planner
TITLE

 siguature

08/09/19
DATE
EVALUATION OF ENVIRONMENTAL IMPACTS

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

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.
3. PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Our Lady of Mt. Lebanon Project (Project) includes: (1) the development of a 19-story, multi-family residential building with 153 apartment units (including 17 Very Low Income units) and a maximum height of 225 feet; (2) the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral of Our Lady of Mt. Lebanon–St. Maronite Catholic Cathedral (Applicant), with a resulting floor area of approximately 7,790 square feet; and (3) the removal of three existing ancillary church buildings, including the parish rectory, a building with offices and meeting rooms and a social hall, with an aggregate floor area of 12,370 square feet, and their replacement with a new three-story building with approximately 23,649 square feet of ancillary church uses, including offices, meeting rooms and a multi-purpose room.

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3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 331–333 S. San Vicente Boulevard and 8531–8555 W. Burton Way within the Wilshire Community Plan area of the City of Los Angeles (City). As shown in Figure 1 on page 10, the Project Site is bounded by an alley to the north, Burton Way to the south, San Vicente Boulevard to the east, and Holt Avenue to the west.

3.2.2 Existing Conditions

The 42,285-square-foot (0.97-acre) Project Site is currently developed with the following improvements: a one-story, 6,848-square-foot cathedral; three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory, a one-story, 5,426-square-foot social hall, and a three-story, 4,424-square-foot building with offices and meeting rooms; and a surface parking lot. As shown in Figure 2 on page 11, the cathedral is situated on the...
Figure 1
Project Location Map

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2019.
Figure 2
Aerial Photograph of the Project Vicinity

Source: Apple Maps, 2019; Eyestone Environmental, 2019.
eastern portion of the Project Site at the intersection of San Vicente Boulevard and Burton Way. The ancillary church buildings are located to the north and west of the cathedral, while the surface parking lot is located on the western portion of the Project Site. Access to the Project Site is currently available via two driveways along Burton Way and at various points along the publicly-accessible alley that abuts the Project Site to the north. Existing landscaping within the Project Site includes several trees and shrubs.

The Project Site is located within the planning boundary of the Wilshire Community Plan area. The Project Site has a General Plan land use designation of High Medium Residential and is zoned [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). The “Q” prefix indicates restrictions on the property as a result of a zone change to ensure compatibility with the surrounding properties. The “Q” Conditions applicable to the Project Site, pursuant to Ordinance No. 167711, include standards and limitations relating to setbacks, residential parking regulations, parking garage restrictions, landscaping and open space. The R4 designation indicates that the Project is located within a Multiple Dwelling Zone, which permits a wide variety of uses, including the following: residential uses; churches; child care facilities or nursery schools; hotels, motels, and apartment hotels; fraternity or sorority hours and dormitories; schools or educational institutions; museums or libraries; accessory uses and home occupations; and retirement hotels. Height District 1 within the R4 zone does not restrict building height or number of stories, but does limit the maximum floor area ratio (FAR) to 3:1. The “O” designation indicates the Project Site is located within an oil drilling district where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

Our Lady of Mt. Lebanon currently holds masses at the cathedral on Monday through Friday at 8:00 A.M., on Saturday at 8:00 A.M., and on Sunday at 9:00 A.M. and 11:30 A.M. The church offices house a three-person staff and are open Monday through Friday from 8:00 A.M. to 5:00 P.M. The church also holds meetings and classes in its meeting rooms and at the rectory approximately one to three times a week on Monday through Friday from 7:00 P.M. to 11:00 P.M. In addition, the church currently hosts 25 to 30 events each year, primarily in the social hall (which has a maximum capacity of approximately 200 people) for weddings, funerals and other church functions. Most of these events take place in the evening, but have occurred from 11:00 A.M. to 1:00 A.M. Currently, off-site parking is required from time to time for special masses and social hall events.

3.2.3 Surrounding Land Uses

The Project Site is located along the western edge of the Beverly Grove District, which is a neighborhood in the Mid-City West area of the City. This area surrounding the Project Site is developed with a mix of commercial and residential uses. Land uses located adjacent to the Project Site include an 11-story residential condominium building to the north (across the alley), a three-story retail building and parking structure\(^2\) to the east across San Vicente Boulevard, two and five-story, multi-family residential buildings to the south across Burton Way, and a five-story, multi-family residential building to the west across Holt Avenue. Other nearby uses include the Beverly Center to the north and additional residential and commercial uses. The uses surrounding the Project Site have various land use and zoning designations, including General Commercial, Neighborhood Office Commercial, and Medium and

\(^2\) The City has approved entitlements to replace the existing development with a new mixed-use project with residential and retail uses (approved through Case No. CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR). Based on approval of that case and associated Ordinance No. 184,720 (effective March 8, 2017), the zoning for this property is now (T)(Q)C2-2D-O with a General Commercial land use designation.

As shown in Figure 1 on page 10, primary regional access to the Project Site and vicinity is provided by the Santa Monica Freeway (I-10), which is approximately five miles south of the Project Site. Major arterials providing regional access to the Project Site include West 3rd Street to the north, La Cienega Boulevard to the east, Burton Way and Wilshire Boulevard to the south, and Santa Monica Boulevard to the west and north.

Public transit service in the vicinity of the Project Site is currently provided by numerous local and regional bus lines. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides rapid bus service on Line 705, which runs from West Hollywood along La Cienega Boulevard and Vernon Avenue through Mid-City and South Los Angeles to Vernon. Metro also provides local bus services on Line 105, which has the same route as Rapid Line 705. Also near the Project Site are Metro Lines 16 and 316, which run from Century City along Santa Monica Boulevard, Burton Way, and 3rd Street to Downtown Los Angeles. In addition, Metro Line 17 runs from Culver City along Robertson Boulevard and 3rd Street to Downtown Los Angeles, and Metro Line 218 runs from Cedars-Sinai Medical Center along 3rd Street, Fairfax Avenue, and Laurel Canyon Boulevard to Studio City. Lastly, Metro Line 30 runs from West Hollywood along San Vicente Boulevard and Pico Boulevard through Downtown Los Angeles to Boyle Heights, and Metro Line 330 runs from West Hollywood along San Vicente Boulevard and Pico Boulevard to Downtown Los Angeles. The City’s Department of Transportation also provides local bus service on the DASH Fairfax Route, which runs from Cedars-Sinai Medical Center along La Cienega Boulevard, Melrose Avenue, Fairfax Avenue, and 3rd Street to the Miracle Mile along Wilshire Boulevard. In addition, the City of West Hollywood provides free local bus service throughout West Hollywood’s city limits along its free Cityline route, which runs from Cedars-Sinai Medical Center, primarily along San Vicente Boulevard and Santa Monica Boulevard, to La Brea Avenue. The nearest bus stops to the Project Site include a bus stop at La Cienega Boulevard and San Vicente Boulevard serving Metro’s Line 105 and an additional bus stop along La Cienega Boulevard, near 3rd Street serving Metro’s Lines 16, 105, 218, and 705 as well as the DASH Fairfax.

### 3.3 DESCRIPTION OF PROJECT

#### 3.3.1 Project Overview

The Project includes the development of new multi-family residential uses and rehabilitation and limited alteration of the existing Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral. Specifically, as summarized in Table 1 on page 14, the Project includes the development of 153 residential apartment units (including 17 units for Very Low Income households), the approximate 7,790 square-foot rehabilitated cathedral, and approximately 23,649 square feet of new ancillary church uses, including 3,400 square feet of church offices, 7,649 square feet of meeting rooms for use by the church, and a new 12,600-square-foot multi-purpose room.

The proposed residential units would be provided in a new 19-story residential building with a maximum height of 225 feet, while the new ancillary church uses would be located in a new three-story church building with a height of approximately 42 feet. During construction, the existing cathedral, except for the primary entrance volume of the building, would be deconstructed and temporarily stored at an off-site location to allow excavation and construction activities for the proposed subterranean parking
Table 1
Summary of Proposed Floor Area

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Existing Development</th>
<th>Existing to Be Removed</th>
<th>Proposed Development</th>
<th>Net New Floor Area</th>
<th>Total Floor Area On Project Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Church/Institutional</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cathedral</td>
<td>6,848 sf</td>
<td>942 sf</td>
<td>7,790 sf</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parish Rectory/Meeting Rooms</td>
<td>2,520 sf (2,520 sf)</td>
<td>7,649 sf</td>
<td>5,129 sf</td>
<td>7,649 sf</td>
<td></td>
</tr>
<tr>
<td>Social Hall/Multi-Purpose Room</td>
<td>5,426 sf (Social Hall)</td>
<td>12,600 sf (Multi-Purpose Room)</td>
<td>7,174 sf</td>
<td>12,600 sf</td>
<td></td>
</tr>
<tr>
<td>Offices</td>
<td>4,424 sf (4,424 sf)</td>
<td>3,400 sf</td>
<td>(1,024) sf</td>
<td>3,400 sf</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>19,218 sf</strong></td>
<td><strong>12,370 sf</strong></td>
<td><strong>173,232 sf</strong></td>
<td><strong>160,862 sf</strong></td>
<td><strong>180,080 sf</strong></td>
</tr>
</tbody>
</table>

sf = square feet
du = dwelling units
( ) = negative value

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


structure and the residential and church buildings. The primary entrance volume (i.e., the front façade of the cathedral), which contains almost all of the building’s exterior ornamentation, would be moved approximately 30 feet to the southeast corner of the Project Site and braced and protected in place until the cathedral is reassembled. Upon completion of the proposed five-level subterranean parking structure and partial construction of the residential and church buildings, the cathedral building would be reassembled in its approximate original location and rehabilitated. During reassembly of the cathedral building, there would be limited modifications to create a more functional sanctuary and congregation seating area, including ADA-compliant aisles and access ramps, additional accessible bathrooms and an expanded cry room. Following reassembly, two small additions would be appended to the rear (north) façade and the north end of the side (east) façade of the cathedral for an expanded chancel and ramp up to the chancel. A Conceptual Site Plan of the Project is provided in Figure 3 on page 15.

As part of the Project, three existing ancillary church structures, which include the parish rectory, church offices, and the social hall, would be demolished and replaced with the new church building that includes the replacement offices, meeting rooms and multi-purpose room. The development of the
Project would also require the removal of six non-protected trees,\(^3\) including two fern pine trees, one olive tree, one cedar tree, one cypress tree, and one jacaranda tree. The Project includes the planting and retention of 53 trees. Overall, as provided in Table 1 on page 14, the Project would result in a net increase of approximately 160,862 square feet of new floor area on the Project Site. Upon completion of the Project, the total floor area of the Project Site would be approximately 180,080 square feet, with a maximum FAR of 4.99:1.

Following the completion of the Project, Our Lady of Mt. Lebanon would resume its current mass schedule and operation of the church offices, and resume holding periodic meetings and classes in the ancillary church building. These activities are expected to continue at the same times and frequency as they currently do. In addition, the church would continue to hold 25-30 events each year, including weddings, funerals, fundraisers and other church events. These events would primarily take place in the multi-purpose room, which would have a capacity of approximately 600 people. While the frequency of these events would remain the same, the size of some of these events would increase because the multi-purpose room would have a larger capacity than the existing social hall, which has a capacity of approximately 200 people. In addition, it is expected that 6-8 community events would be held in the multi-purpose room each year.

3.3.2 Design and Architecture

As illustrated in Figure 3 on page 15, the existing one-story cathedral would be reassembled in its approximate original location on the eastern portion of the Project Site, near the intersection of San Vicente Boulevard and Burton Way. The new, three-story church building with the replacement ancillary church uses would reach a maximum height of 42 feet and be located to the west and north of the rehabilitated cathedral. The Project also includes the construction of a new bell tower behind the cathedral, as well as a new courtyard for the church’s use, just west of the cathedral. As shown in Figure 3, the new 19-story residential building, would reach a maximum height of 225 feet and be located along the western portion of the Project Site, west of the new three-story ancillary church building.

As shown on Figure 4 on page 17, Level 1 of the Project includes the rehabilitated cathedral, the cathedral courtyard, the church multi-purpose room, a food preparation and kitchen area for use by the church, the entrance to the parking structure, the lobby area of the residential building, and several residential units. As shown on Figure 5 on page 18, Level 2 of the Project includes church offices, meeting rooms and storage space, two outdoor decks for the ancillary church uses, and additional residential units. As illustrated in Figure 6 on page 19, Level 3 of the Project includes church meeting rooms, as well as the church lobby and the church library. Additional residential units would also be located on this level. As shown on Figure 7 on page 20, Level 4 includes residential units and related residential amenities, including a common open space area and recreation deck, fitness room, residential recreation room and pool deck. Level 5 through Level 19 of the residential tower include the remaining residential units.

As illustrated in Figure 3, the Project also includes a bell tower at the northeast corner of the Project Site. The bell tower is an architectural element of the Project and would not be operational. The

\(^3\) Section 17.05.R of the LAMC (Protected Tree Regulations) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined therein as “protected.”
Figure 4
Conceptual Floor Plan—Level 1

The Project features a design with varied massing and materials to articulate the new buildings. It draws inspiration from the northwest-to-southeast orientation of the preserved cathedral by aligning the new building elements, including the residential tower, with this axis. This results in a mix of angled forms that would break up street-facing elevations and avoid their perception as single flat surfaces. The design of the residential building reflects a highly articulated, residentially scaled, soft, modern architectural style with varied heights that maximize views to the sky for pedestrians. The residential building is designed to angle away from the condominium building to the north to maintain view privacy and respect the immediate setting of the cathedral. Building materials include unitized precast integral-colored concrete and metal panels, textured integral-colored plaster, perforated metal panels and glass.

The new ancillary church building would connect the cathedral to the new residential building at the west end of the Project Site. This building would be three stories in height (not to exceed 42 feet) and provides a height transition between the cathedral and the residential building. The ancillary church building would be connected to the rear façade of the cathedral in the northeast portion of the Project Site, and extend west to connect to the base of the residential building. The cathedral’s primary three façades would remain visible as they were historically, and would face a new courtyard and Burton Way to the southwest, the intersection of Burton Way and San Vicente Boulevard to the southeast, and San Vicente Boulevard to the northeast. The taller residential building is situated on the Project Site in such a way that it would be separated from the cathedral by a series of smaller volumes, in particular, the ancillary church space, that are compatible with the scale, proportions and design of the cathedral. The residential building would also be finished with a historically compatible paint palette of various shades of cream, off-white, and tan.

### 3.3.3 Preservation and Rehabilitation of the Cathedral

The Project includes the deconstruction, temporary storage, reassembly, and rehabilitation of the cathedral building as part of the Project. The cathedral would be partially deconstructed and temporarily relocated to an off-site location to allow excavation, the construction of the subterranean parking structure and the partial construction of the new residential and ancillary church buildings. The cathedral’s primary entrance volume (with dimensions of 31-feet, 3-inches wide by 8-feet, 4-inches deep), which contains almost all of the cathedral’s exterior ornamentation, would be moved forward approximately 30 feet to the southeast corner of the Project Site, temporarily braced and protected on-site until the cathedral is reassembled.

During disassembly, the cathedral’s roof structure, including clay tile roofing, painted/stenciled ceiling, trusses and purlins, exterior doors and frames, and original decorative features, including columns, trim, moldings, surrounds and precast concrete vent/grilles, would be photo-documented, numbered, and indexed so that the components can be reassembled in their original configuration. Non-original steel windows/frames, murals, light fixtures, furnishings, and altar components may also be deconstructed and temporarily stored for potential reassembly. Exterior and interior original wood-frame walls and finishes would be discarded and reconstructed. Exterior stucco and interior plaster samples would be salvaged so that the stucco/plaster can be replicated to match the original in color, texture, and composition. Non-original wood parquet flooring may be salvaged and reassembled, and non-original carpet would be discarded. The cathedral’s existing concrete slab foundation would be demolished and reconstructed.
Upon completion of the subterranean parking and the partial construction of the residential and ancillary church buildings, the cathedral building would be reassembled in its approximate existing location (moved forward 1 foot, 9 inches), reattached to the primary entrance volume, and rehabilitated. The cathedral’s original form, massing, roof pitch, and fenestration pattern would be restored, as would its large open interior volume and general configuration of interior spaces. The non-historic rounded bay additions currently present on either side of the main entrance volume would not be recreated. Rather, the original articulation of the primary façade would be restored—side wing walls would be set back from the primary entrance volume, as they were historically, and two windows (one circular and one rectangular), originally located on either side of the main entrance, would be restored. The historic paint palette of the cathedral would also be restored, based on forensic evidence of original painted finishes.

Some modifications to the floor plan would be implemented during reassembly of the building in order to accommodate a more functional sanctuary and congregation seating area. These include ADA-compliant aisles and access ramps, additional accessible restrooms, and an expanded crying room. Specifically, each of the side aisles flanking the nave would be widened by 18 inches, and secondary spaces at the north and south ends of the building (crying room, restrooms, confessional/confessor rooms, and sacristies) would be reconfigured. The overall length of the building would increase by approximately 8 feet toward the rear of the property to accommodate a larger entry vestibule and chancel. The nave, the most significant, intact primary interior space, would retain the same dimensions as it does currently, and its relationship to the entry vestibule, chancel, side aisles, and secondary spaces would not change.

Upon reassembly, two additions would be appended to the rear (north) façade and the north end of the side (east) façade of the cathedral building to accommodate an expanded chancel and ramp up to the chancel, respectively. The proposed additions would be modest in size, simple in design, and constructed of similar materials (stucco cladding, clay tile roofing) as the historic cathedral building. The rear and side additions would serve as a visual transition between the historic building and the more contemporary, flat roofed portions of the new development. The rehabilitation of the cathedral would comply with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

### 3.3.4 Open Space and Landscaping

As illustrated in Figure 8 through Figure 10 provided on pages 23 through 25, the Project incorporates various private and common open space amenities throughout the residential building. Specifically, as illustrated in Figure 10, Level 4 of the building includes a 676-square-foot indoor fitness room and 1,266-square-foot recreation room, a 5,242-square-foot outdoor recreation deck and a 2,016-square-foot pool deck. Outdoor open space amenities also include barbecue stations, a spa, pool, firepit areas, built-in banquet seating, and informal seating. Private open space amenities include four patios for the ground floor residences and 144 balconies throughout the residences on all other levels of the residential building. In addition, the Project includes extensive landscaping, some of which would serve as screening along the perimeter of the Project Site. Overall, as summarized in Table 2 on page 26, the Project includes approximately 16,800 square feet of open space in accordance with the requirements of the LAMC. In addition, the Project includes the planting or retention of 53 trees throughout the Project Site in accordance with Ordinance No. 167711, “Q” Conditions 6.B and 7.
Figure 10
Conceptual Landscape Plan—Level 4

### Table 2
Summary of Proposed Open Space

<table>
<thead>
<tr>
<th>Open Space Type</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ground Floor Private Patios</td>
<td>400 sf</td>
</tr>
<tr>
<td>Private Balconies</td>
<td>7,200 sf</td>
</tr>
<tr>
<td>Level 4 Outdoor Recreation Deck</td>
<td>5,242 sf</td>
</tr>
<tr>
<td>Level 4 Pool Deck</td>
<td>2,016 sf</td>
</tr>
<tr>
<td>Level 4 Fitness Room</td>
<td>676 sf</td>
</tr>
<tr>
<td>Level 4 Recreation Room</td>
<td>1,266 sf</td>
</tr>
<tr>
<td><strong>Total Open Space Provided</strong></td>
<td><strong>16,800 sf</strong></td>
</tr>
</tbody>
</table>

*sf = square feet*

*Source: Craig Lawson & Co., LLC; Nadel, 2019.*

#### 3.3.5 Access, Circulation, and Parking

Vehicular access to the five-level subterranean parking structure would be provided by a driveway along the publicly-accessible alley that abuts the Project Site to the north. The alley would also provide access for freight vehicles to the loading area. In addition, there would be passenger drop-off areas on Burton Way. Pedestrian access to the Project Site would be located along the perimeter of the Project Site. Specifically, pedestrian access to the cathedral would be along both San Vicente Boulevard and Burton Way. Access to the ancillary church building would be through the church courtyard, as well as church lobby on Burton Way. The residential building would be accessed through a residential lobby entrance along Burton Way. Primary pedestrian access to the proposed subterranean parking structure would be located at the northwest and northeast corners of the Project Site, accessible from the alley, Holt Avenue, and San Vicente Boulevard.

All of the parking spaces for the Project would be located in the subterranean parking structure, which would extend to a depth of approximately 72.5 feet below the existing ground surface. Based on LAMC requirements and Ordinance No. 167711, “Q” Condition requirements for the new and retained buildings and land uses, the Project requires 314 vehicle parking spaces, consisting of 252 residential parking spaces (including 39 guest parking spaces) and 62 church parking spaces. The Project includes a total of 397 vehicle parking spaces, including 252 residential parking spaces and 145 church parking spaces. The number of church parking spaces exceeds the number of code-required parking spaces to provide sufficient parking for holiday services and larger events in the multi-purpose room. In accordance with the requirements of the LAMC, the Project would also include 111 residential bicycle parking spaces and 13 church bicycle parking spaces. In addition, 20 percent of the provided parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), and 5 percent of the provided parking spaces will have electric vehicle (EV) charging stations.

#### 3.3.6 Lighting and Signage

Exterior lighting would include low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features and landscaping elements would be incorporated throughout the Project Site. Project lighting would be
designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would include mounted project identity signage and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. All proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and pursuant to the requirements of the LAMC.

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

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project include, but would not be limited to the following: photovoltaic cells; recycled rainwater irrigation storage; greywater ready piping systems; sun shading devices; electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design.

3.3.8 Project Construction and Schedule

Construction of the Project would commence with demolition of the existing rectory building, social hall building and church office building, followed by the deconstruction of the cathedral building. This would be followed by excavation for the subterranean parking garage, construction of the subterranean parking structure and construction of the new residential and ancillary church buildings. Upon completion of the subterranean parking structure and the partial construction of the residential and ancillary church buildings, the cathedral would be reassembled at its approximate current location. Building construction would continue, followed by paving/concrete and landscape installation. It is anticipated that project construction would commence in 2021 and be completed in 2024. It is estimated that approximately 110,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. The haul route from the Project Site is anticipated to include Burton Way, Robertson Boulevard, Wilshire Boulevard, La Cienega Boulevard, I-10, and South Vincent Avenue. Incoming haul trucks are anticipated to access the Project Site from South Vincent Avenue, I-10, Venice Boulevard, Cadillac Avenue, La Cienega Boulevard, Wilshire Boulevard, South San Vicente Boulevard, and Burton Way.
3.4 REQUIRED APPROVALS AND PERMITS

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

- Pursuant to LAMC Section 12.22 A.25 Affordable Housing Incentives—Density Bonus, a 35-percent increase in density, in exchange for setting aside 15 percent of the permitted base density for the Project Site for Very Low Income restricted affordable households; and parking consistent with LAMC Section 12.22 A.25(d)(1) (Affordable Housing Reduced Parking Option 1) for all residential units.

- Pursuant to LAMC Section 12.22 A.25(e)(1), Affordable Housing On-Menu Incentives as follows:
  - Pursuant to LAMC Section 12.22 A.25(f)(4)(i), an On-Menu incentive to allow a 35-percent increase in allowable Floor Area Ratio (FAR) equal to the percentage of Density Bonus, which increases the maximum allowable FAR from 3:1 to 4.05:1;
  - Pursuant to LAMC Section 12.22 A.25(f)(7), an On-Menu incentive to include the area of any land required to be dedicated for street or alley purposes as lot area for calculating the maximum density permitted by the underlying zone in which the Project is located; and
  - Pursuant to LAMC Section 12.22 A.25(f)(1), an On-Menu incentive to allow a 12-foot, 10-inch westerly side yard setback, in lieu of the otherwise required 16-foot side yard setback per LAMC Section 12.11 C.2.

- Pursuant to LAMC 12.22 A.25(g)(3)(ii), and California Government Code Section 65915(e)(1), requests for Affordable Housing Off-Menu Waivers of Development Standards as follows:
  - A Waiver of Development Standard to allow an additional increase in FAR from 4.05:1 to 4.99:1, resulting in 180,080 square feet of total floor area;
  - A Waiver of Development Standard to allow a variable width of 0–16 feet for the easterly side yard setback in lieu of the otherwise required 16-foot side yard setback per LAMC Section 12.11 C.2;
  - A Waiver of Development Standard to allow a reduction of the common usable open space landscaping requirements to 23 percent on the Level 4 Recreation Deck Area and 10 percent on the Level 4 Pool Deck area in lieu of the otherwise required 50 percent per Ordinance No. 167711, “Q” Condition No. 6.B; and
  - A Waiver of Development Standard to allow 37 trees to be planted within the common usable open space areas in lieu of the otherwise required 51 trees in the common usable open space area per Ordinance No. 167711, “Q” Condition No. 6.B, and to have the remaining balance of trees, or 14 trees, outside of common usable open space areas throughout the entire property (including the 10 street trees); and
  - A Waiver of Development Standard to allow non-building structures and improvements, including without limitation hardscape, stairs, walkways, gates, and fences and guard
railings that exceed 42 inches in height, within 5 feet from the property line along W. Burton Way, as otherwise prohibited per Ordinance No. 77072 (Building Line), Section 1.

- Pursuant to LAMC Section 12.24 X.7, a Zoning Administrator's Determination to allow a fence up to 8 feet in height within the front yard setback area located along the W. Burton Way frontage.

- Pursuant to LAMC Section 16.05, approval of Site Plan Review for a development project that includes 50 or more dwelling units.

- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map (VTT-82229) to subdivide the property into 1 master lot and 5 airspace lots; and a haul route for the export of up to 110,000 cubic yards of export material.

- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.
INITIAL STUDY

4. ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under the California Environmental Quality Act (CEQA), as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099(a)(7) defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099(a)(4) defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.”

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

PRC Section 21099 applies to the Project because, consistent with Section 21099(d)(1), the Project is a residential and mixed-use project that would be located on an infill site within a transit priority area. First, as described in Section 3, Project Description, of this Initial Study, the Project is a mixed-use development that includes both residential and religious/institutional uses. Second, the Project Site is located on an infill site, as that term is defined in PRC 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Third, the Project Site is located within a transit priority area, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing “major transit stop.” The Project Site is located within one-half mile of the intersection of S. La Cienega Boulevard and 3rd Street, which qualifies as a major transit stop (as that term is defined in PRC Section 21064.3) because two or more bus routes intersect there that have service intervals of 15 minutes or less during morning and afternoon peak commute periods. Therefore, the Project Site is located in a transit priority area as defined in PRC Section 21099. The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a transit priority area, as defined in the ZI No. 2452. As a result, in accordance with PRC Section 21099(d)(1), the Project’s aesthetic

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impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA.

Accordingly, the aesthetics discussion below is for informational purposes only and not for determining whether the Project will result in any significant impact on the environment. Any aesthetic discussion in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings analysis or mitigation measures.

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?  ☑ ☐ ☒ ☐

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

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?  ☑ ☐ ☒ ☐

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

a. Would the project have a substantial adverse effect on a scenic vista?

**Less Than Significant Impact.** A scenic vista is a panoramic view of a valued visual resource. 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 typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

As shown in the site photographs included in Figure 11 through Figure 13 on pages 32 and 34, due to the highly urbanized and built out surroundings, predominantly flat terrain of the vicinity, and the dense intervening development that blocks long-range expansive views, scenic vistas of valued visual resources in the vicinity of the Project Site are not available. In particular, a limited portion of the Hollywood Hills, a visual resource, is visible traveling north along San Vicente Boulevard east of the Project Site. However, the view of this portion of the Hollywood Hills is not considered a scenic vista as the view is narrow and mostly obstructed by intervening buildings along San Vicente Boulevard. Therefore, panoramic views of the Hollywood Hills are not available in the vicinity of the Project Site. In any event, the Project would not obstruct existing views of the Hollywood Hills as the existing on-site
Figure 11
Existing Site Photographs Index Map

Figure 12
Existing Site Photographs

cathedral would be reassembled in its current general location and the 11-story residential condominium building located to the north across the alley would continue to dominate the viewshed along the eastern portion of the Project Site.

With regard to scenic vistas that may be available looking across the Project Site, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. Land uses located adjacent to the Project Site include an 11-story residential condominium building to the north (across the alley), a three-story retail building and parking structure to the east across San Vicente Boulevard, two-story and five-story, multi-family residential buildings to the south across Burton Way, and a five-story multi-family residential building to the west across Holt Avenue. As such, there are no resulting views of scenic vistas when looking across the Project Site. Therefore, the Project would not have the potential to substantially or adversely affect a scenic vista since there are no views of scenic vistas when looking across the Project Site.

In any event, the Project cannot have a substantial adverse effect on a scenic vista pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no evaluation of this topic is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Less Than Significant Impact.** The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the California State Route 1, approximately 10 miles west of the Project Site. The City’s Mobility Plan 2035 identifies Burton Way, located adjacent to the Project Site, as a local scenic highway. According to Mobility Plan 2035, the “scenic feature” for the Burton Way Scenic Highway is its landscaped median. In addition, Mobility Plan 2035’s Scenic Highways Guidelines include the following guideline (3c) relevant to specimens of existing trees located anywhere within the right-of-way of a scenic highway:

3c. Outstanding specimens of existing trees and plants located within the public right-of-way of a Scenic Highway shall be retained to the maximum extent feasible within the same public right-of-way.

As provided in the Tree Report prepared for the Project, which is included in Appendix IS-1 of this Initial Study, there are seven street trees adjacent to the Project Site. Three of these trees are located on Burton Way, which is a local scenic highway, and are therefore considered Scenic Highway Specimen Trees based on the City’s Mobility Plan 2035. All but one of the seven street trees, including all of the Burton Way Scenic Highway Specimen Trees, would be retained and protected in place throughout the construction of the Project. Therefore, the Project would not damage any scenic resources, including, but

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5 The City has approved entitlements to replace the existing development with a with a new mixed-use project with residential and retail uses (approved through Case No. CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR). Based on approval of that case and associated Ordinance No. 184,720 (effective March 8, 2017), the zoning for this property is now (T)(Q)C2-2D-O with a General Commercial land use designation.

not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized natural features within a state scenic highway.

In any event, the Project cannot substantially damage scenic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no evaluation of this topic is required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is zoned [Q]R4-1-O (Multiple Dwelling Zone, Height District 1, Oil Drilling District). The “Q” prefix indicates restrictions on the property as a result of a zone change, and include standards and limitations relating to setbacks, residential parking regulations, parking garage restrictions, landscaping and open space. The R4 designation indicates that the Project is located within a Multiple Dwelling Zone, which permits a wide variety of uses, including the following: residential uses; churches; child care facilities or nursery schools; hotels, motels, and apartment hotels; fraternity or sorority hours and dormitories; schools or educational institutions; museums or libraries; accessory uses and home occupations; and retirement hotels. The “1” in the Project Site’s zoning indicates the Project Site is located within Height District 1. Height District 1 within the R4 Zone does not restrict building height or number of stories, but does limit the maximum floor area ratio (FAR) to 3:1. The “O” designation indicates the Project Site is located within an oil drilling district where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

As described in Section 3, Project Description, of this Initial Study, the Project includes the development of a new residential building with 153 units and a new ancillary church building, and the rehabilitation of the existing cathedral. These proposed uses would be consistent with the types of uses anticipated for the Project Site’s R4-1 Zone. The proposed height of the 19-story (225-foot) residential building would also be consistent with the height and visual qualities of existing and approved buildings in the project vicinity and along the San Vicente Boulevard corridor. In particular, immediately to the north of the Project Site (across the alley) is an 11-story, 82-unit residential condominium building, with a height of 112 feet. Further to the north of the Project Site is the Cedars-Sinai Medical Center, which is comprised of multiple medical towers and office buildings, including two, 11-story buildings and a 12-story building. Directly to the east of the Project Site (across San Vicente Boulevard) is the location for a recently approved (January 2017) mixed-use development, consisting of 145 residential units and approximately 32,000 square feet of retail/restaurant uses within a 17-story building with an overall height of 221 feet. That site is currently developed with a three-story retail building and parking structure. Other mid- and high-rise properties in the vicinity of the Project Site include the 16-story, Four Seasons hotel at 300 S. Doheny, the 10-story Sofitel Hotel at 8555 Beverly Boulevard, and the eight-story Beverly Center commercial development at 8500 Beverly Boulevard.
The R4 Zone requires a 15-foot front yard setback along the Burton Way frontage. However, a 5-foot building line established in 1936 by Ordinance No. 77072 supersedes the R4 setback requirement (LAMC Section 12.22 C.1). Therefore, only the five-foot building line (setback) is required for the Burton Way front yard. The Project includes a five-foot setback along this frontage, consistent with the building line requirement. Pursuant to Ordinance No. 167711, a minimum eight-foot side yard for all developments that exceed 80 feet of street frontage is required. Pursuant to LAMC Section 12.11 C.2 and C.3, a 16-foot setback along the side yards along Holt Avenue and San Vicente Boulevard, and a 20-foot rear setback are required, respectively, for a 19-story building. The Applicant has requested: (1) an on-menu incentive to permit a 12-foot, 10-inch westerly side-yard setback, in lieu of the otherwise required 16 feet along Holt Avenue per the LAMC; and (2) an off-menu incentive/waiver of development standards to allow a 0- to 16-foot variable width easterly side-yard setback, in lieu of the otherwise required 16 feet along San Vicente Boulevard per the LAMC, in order to accommodate the cathedral building in its approximate existing location following its reassembly, rehabilitation and modification. The Project provides a 20-foot rear-yard setback that includes one-half the width of the adjacent alley (10 feet), as permitted by LAMC Section 12.22 C.10. While the Project includes reduce side-yard setbacks along the perimeter of the Project Site, the Project would be contained within the boundaries of the Project Site and would be consistent with the existing visual character of the on-site cathedral.

With regard to the City’s regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element and the Wilshire Community Plan. The Project’s consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City’s vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing a large, underutilized surface parking lot with a pedestrian-oriented building, integrating extensive landscaping, including new and existing street trees along all street frontages, and removing all existing automobile driveways along Burton Way and Holt Avenue (automobile access will be restricted to the alley behind the Project Site). In addition to rehabilitating the existing cathedral building, the Project includes the replacement and enhancement of the other existing church facilities, including a new multi-purpose room for church events and limited community events, meeting rooms and offices that will be located adjacent to the rehabilitated cathedral.

Wilshire Community Plan

As set forth in the Urban Design Chapter of the Wilshire Community Plan, the purpose of that chapter is to define general policies and urban design standards for commercial, multiple-family residential, and limited industrial development, and for overall community design. In multiple-family residential areas such as where the Project Site is located, the emphasis of the Urban Design Chapter is on the promotion of architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents. Specific design elements for multi-family residential projects set forth in the Wilshire Community Plan that would be implemented as part of the Project include the
following: pedestrian entrances at the front of the residential building; useable open space for outdoor activities; a design of quality and character that improves community appearance by avoiding excessive variety or monotonous repetition through the use of articulations, recesses, surface perforations, utilizing complementary building materials on building façades, providing a variation in design to provide definition for each floor, integration of building fixtures, and screening of roof-top equipment; and integrating the parking structure with the design of the building by providing all parking below the building.

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

**Less Than Significant Impact.** The Project Site currently generates minimal levels of light and glare from interior light spillage and vehicle headlights in the surface parking area. Existing lighting within the Project Site includes low level lighting associated with the existing cathedral and ancillary church buildings and vehicle lighting from the surface parking area. Existing glare sources within the Project Site include glass, architectural elements, and vehicle headlights. The Project Site is in an urbanized area and is surrounded by urban infrastructure, street lighting, and mid- and high-rise buildings with sources of daytime and nighttime light and glare. The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, including architectural, interior, security and wayfinding light sources.

**Construction**

The majority of Project construction would occur during daylight hours. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project-related construction activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. In any event, pursuant to PRC Section 21099(d)(1) and Zoning Information File ZI No. 2452, the Project’s aesthetics impacts would not be considered significant. Therefore, no evaluation of this topic is required under CEQA.
Operation

New sources of exterior lighting that would be introduced by the Project would include: shielded low to medium output exterior lighting on the buildings and along pathways for security and wayfinding purposes; shielded low to medium output lighting to accent signage, architectural features, and landscaping elements; outdoor decorative lights of low to medium output; and interior lighting visible through the windows of the residential, cathedral, and ancillary church uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project signage would be illuminated by means of low to medium output external lighting, internal halo lighting, or ambient light. These lighting sources would be similar to other lighting sources already within the Project Site and in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior lighting would be shielded and/or directed toward the areas to be lit within the Project Site to avoid light spillover onto adjacent sensitive uses. Project lighting would also comply with regulatory requirements, including the requirements set forth by CALGreen and Title 24 that stipulate the use of high-performance light with appropriate light and glare control according to backlight, uplight, and glare standards.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Sun reflection from the Project buildings would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, and aluminum. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. Limited nighttime glare could result from illuminated signage and from vehicle headlights. Headlights from vehicles entering and exiting the parking garage would be visible during the evening and nighttime hours, and such lighting sources would be typical for the area.

Based on the above, with adherence to regulatory requirements, Project operation would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. In any event, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, the Project’s light and glare impact cannot be considered significant. Therefore, no evaluation of this topic EIR is required under CEQA.

II. AGRICULTURE AND FOREST RESOURCES

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

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

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

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

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

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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?

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles (City). As previously discussed, the Project Site is currently developed with a one-story cathedral and ancillary church buildings that consist of a two-story rectory, one-story social hall, three-story office building, and a surface parking lot. The uses surrounding the Project Site include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.\(^7\) As such, the Project would not convert farmland to a non-agricultural use. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling), which permits a wide variety of uses including, but not limited to: residential uses; churches; child care facilities or nursery schools; hotels, motels, and apartment hotels; and schools or educational institutions. The Project Site is not zoned for agricultural use. Furthermore, no agriculturally zoned land is present in the surrounding area. Neither the Project Site nor any land in the surrounding area is subject to a Williamson Act Contract. Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with a one-story cathedral and ancillary church buildings. The Project Site does not include any forest land or timberland. In addition, the Project Site is zoned as [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). The Project Site is not zoned for forest land and is not used as forest land. Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?  

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

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

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

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### III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

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<th>Would the project:</th>
<th>Potentially Significant Impact</th>
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<th>No Impact</th>
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<tbody>
<tr>
<td>a. Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>✗</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</td>
<td>✗</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>c. Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>✗</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</td>
<td>☐</td>
<td>☐</td>
<td>✗</td>
<td>☐</td>
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#### a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM$_{2.5}$], and lead). The SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with the SCAQMD’s AQMP.

#### b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

**Potentially Significant Impact.** As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM$_{2.5}$, and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM$_{10}$), and PM$_{2.5}$. As such, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin.

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11 Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.
Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

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

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and therefore would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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

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IV. BIOLOGICAL RESOURCES

Would the project:

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

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

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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

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

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. Landscaping within the Project Site is limited, consisting of five (5) non-protected trees, shrubs, and grass areas. Due to the disturbed nature of the Project Site and surrounding urban areas, and the lack of undeveloped open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of suitable habitat on the Project Site, it is unlikely any special
status species listed by the California Department of Fish and Wildlife\textsuperscript{14} or by the U.S. Fish and Wildlife Service\textsuperscript{15} would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.\textsuperscript{16} Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

\textbf{No Impact.} As previously described, the Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.\textsuperscript{17,18} Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.\textsuperscript{19,20} In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service.\textsuperscript{21,22,23} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

\textbf{No Impact.} The Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. In addition, the surrounding

\textsuperscript{14} California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, November 2018.


\textsuperscript{17} City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, http://zimas.lacity.org/, accessed April 9, 2019.


\textsuperscript{20} Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

\textsuperscript{21} California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://map.dfg.ca.gov/BIOS/, accessed April 9, 2019.

\textsuperscript{22} California Department of Fish and Wildlife, CDFW Lands, https://map.dfg.ca.gov/lands/, accessed April 9, 2019.

area is fully developed and comprised of commercial and residential uses. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity.\(^{24}\) As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

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

**Less Than Significant.** As described above, the Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of undeveloped open space within and surrounding the Project Site that provide linkages to natural open space areas that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.\(^{25,26}\)

Existing landscaping within the Project Site includes several trees, shrubs, and grass areas. As discussed in the Tree Report prepared for the Project, included in Appendix IS-1 of this Initial Study, there are five on-site trees and seven street trees along the perimeter of the Project Site. The five on-site trees and one street tree along San Vicente Boulevard would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. To ensure compliance with the Migratory Bird Treaty Act, surveys are required to determine if nests will be disturbed and, if so, a buffer area with a specified radius around the nest must be established so that no disturbance or intrusion occurs until the young have fledged and left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the California Department of Fish and Wildlife. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the code and California Department of Fish and Wildlife has never promulgated any regulations interpreting these provisions.

To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, it will be required that tree removal activities associated with the Project take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal

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\(^{26}\) Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.
activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest.

Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City’s Protected Tree Ordinance (Section 17.05 R of the Los Angeles Municipal Code (LAMC)) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as “protected” by the City. Trees that have been planted as part of a tree planting program are exempt from the ordinance and are not considered protected. The Protected Tree Ordinance prohibits the removal of any regulated protected tree without a permit, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Report for the Project included in Appendix IS-1 of this Initial Study, there are five trees located within the Project Site and seven street trees located adjacent to the Project Site along San Vicente Boulevard and Burton Way. The five trees located within the Project Site and one street tree located along San Vicente Boulevard would be removed as part of the Project. Based on the Tree Report, none of the trees within the Project Site and along San Vicente Boulevard and Burton Way are species that are protected under the Protected Tree Ordinance. In accordance with the Department of City Planning’s policy, the on-site trees to be removed would be replaced on a 1:1 basis and the one street tree to be removed would be replaced on a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. This impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. As previously described, landscaping within the Project Site is limited, consisting of five (5) non-protected ornamental trees.

27 While the Tree Report included in Appendix IS-1 of this Initial Study identified the removal of only the five on-site trees, a subsequent case management meeting with the Los Angeles Department of Building and Safety identified the need to remove one existing street tree associated with a required five-foot dedication along San Vicente Boulevard to increase the sidewalk width to 15 feet.
shrubs, and grass areas. As described above, the Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**V. CULTURAL RESOURCES**

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Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

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

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

**a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

*Potentially Significant Impact.* CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (as defined in Public Resources Code Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in Public Resources Code Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which established


30 California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.
SurveyLA, a comprehensive program to identify potentially significant historical resources throughout the City.

As previously discussed, the Project Site is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. According to the City of Los Angeles Zone Information and Map Access System (ZIMAS), the cathedral building on the Project Site was constructed in 1937. In addition, the rectory building was constructed in 1939-1940. Based on the age of these existing buildings and other existing buildings on the Project Site, they have the potential to qualify as historical resources. Therefore, the EIR will provide further analysis of the Project’s potential to result in impacts to historical resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

**Less Than Significant Impact.** Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. In addition, as provided in Appendix IS-2, the results of the archaeological records search conducted by the South Central Coastal Information Center (SCCIC) indicate that there are no identified archaeological sites within the Project Site or within a 0.5-mile radius of the Project Site. However, the Project would require grading of the Project Site and excavations to approximately 72.5 feet below grade for the subterranean parking structure. Therefore, previously unknown archaeological resources could potentially be encountered. Pursuant to the City’s Condition of Approval for an Inadvertent Discovery, in the event that any subsurface archaeological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. In such event, the Applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section (PRC) 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Therefore, given the lack of identified archaeological sites within the Project Site and compliance with the City’s Condition of Approval for an Inadvertent Discovery with regard to archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. The impact on archaeological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?
Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e).

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

VI. ENERGY

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Would the project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. The Project includes: (1) the development of a 19-story, multi-family residential building with 153 apartment units; (2) the deconstruction, reassembly, rehabilitation, and limited alteration of the existing cathedral; and (3) the removal of three ancillary church buildings and their replacement with new ancillary church uses in a three-story building. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project’s demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
Potentially Significant Impact. First established in 2002 under Senate Bill 1078, California’s Renewable Portfolio Standards require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.31 The LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2016 Title 24 standards, which became effective on January 1, 2017.32 The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.33

As previously described, the Project Site is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project’s compliance with LADWP’s plans for renewable energy, as well as the Project’s compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

Would the project:

a. Directly or indirectly cause 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.

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ii. Strong seismic ground shaking?  

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iii. Seismic-related ground failure, including liquefaction?  

iv. Landslides?  

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

c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?  

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?  

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?  

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

The following analysis is based, in part, on the Soils and Geology Report prepared for the Project by Geotechologies, Inc., dated August 7, 2017, and revised February 22, 2019. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-3 of this Initial Study.

a. Would the project directly or indirectly cause 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.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, there are buried thrust faults, which are faults with no surface exposure; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.
The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Soils and Geology Report, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area. According to the Soils and Geology Report, the closest active fault is the Santa Monica Fault, located approximately 0.26 mile west of the Project Site. As such, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth’s crust. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As noted above, no active faults are known to pass directly beneath the Project Site. The closest active fault is the Santa Monica Fault, located approximately 0.26 mile west of the Project Site. According to the Soils and Geology Report, the Santa Monica Fault is an active feature capable of generating future earthquakes. A maximum moment magnitude of 7.4 is estimated for the Santa Monica Fault. However, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City’s General Plan Safety Element, and the Los Angeles Building Code.

Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code (LABC) relating to seismic safety, and the application of accepted and proven construction engineering practices. The LABC incorporates current values.

34 The City of Los Angeles Department of City Planning’s ZIMAS states that the fault nearest to the Project Site is the Hollywood Fault, which is located approximately 2.28 kilometers or 1.42 miles from the Project Site. However, as the Santa Monica Fault has been more recently labeled as an active fault, information from ZIMAS may be considered outdated. As identified on page 28 of the Soils and Geology Report and based on the California Geological Survey for the Beverly Hills Quadrangle dated 1/11/18, the Santa Monica Fault is the closest active fault to the Project Site. Furthermore, ZIMAS likely measures distances from faults based on traces shown on 2-dimensional maps, whereas the California Geological Survey measures distances more accurately based on 3-dimensional mapping.
seismic design provisions of the 2016 California Building Code (CBC), with City amendments, to minimize seismic impacts. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the LABC, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in the final geotechnical report for the Project, which will be subject to review and approval by the LADBS.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Thus, the Project’s impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Both the City and the State of California classify the Project Site as part of a potentially liquefiable area. As provided in the Soils and Geology Report, a site-specific liquefaction analysis was performed following the Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigating Seismic Hazards in California, and the EERI Monograph.

Based on the Soils and Geology Report, groundwater was encountered during exploration at a depth of 18 feet below the existing site grade. According to the California Department of Conservation Seismic Hazard Zones Map for the Beverly Hills Quadrangle, the historically highest groundwater level for the Project Site was approximately 10 feet below ground surface. The site-specific liquefaction analysis conducted for the Project Site considers the historically highest groundwater level of 10 feet and the current groundwater level of 18 feet. In addition, the liquefaction analysis is based on the results from Boring 1, which includes a depth of 100 feet below grade. According to California Geological Survey Special Publication 117A, (1) the vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity and (2) soils having a plasticity index greater than 18 exhibit clay-like behavior, and the liquefaction potential of such soils are considered to be low.

The results of the liquefaction analysis conducted at the Project Site indicate that some soil layers underlying the Project Site have a plasticity index greater than 18. Therefore, these soils are not considered prone to liquefaction. The site-specific liquefaction analysis included in the Soils and Geology


Report identified two potentially liquefiable soil layers. These layers were observed between a depth of 10 feet and 17.5 feet, and between a depth of 22.5 feet and 27.5 feet. However, based on the anticipated depth of excavation for the proposed subterranean parking structure of approximately 72.5 feet, these soil layers are expected to be excavated during construction of the proposed subterranean parking structure. Therefore, based on these considerations, the Project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction. As such, the impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State\textsuperscript{37} nor is the Project Site mapped as a landslide area by the City.\textsuperscript{38,39} All required excavations are expected to be sloped or properly shored in accordance with the applicable provisions of the City of Los Angeles Building Code. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is currently fully developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. As such, there are no open spaces with exposed topsoil. Development of the Project would require grading, excavation and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City’s Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, the Project’s impact related to soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

\textsuperscript{38} Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.
c. Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

**Less Than Significant Impact.** As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

As previously discussed, liquefaction-related effects include lateral spreading. Although the Project Site is located in an identified liquefiable area, the potential for lateral spreading is low since all liquefiable soil layers would be removed during excavation for the proposed subterranean parking structure. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Therefore, the Project’s impact related to lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. In addition, based on the Soils and Geology Report, the Site is not located within a zone on known subsidence due to oil or other fluid withdrawal. Therefore, there no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the Project’s impact related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, according to the State of California Seismic Hazard Zones Map for the Beverly Hills Quadrangle, the Project Site is located within an area susceptible to liquefaction. However, as discussed above, the liquefiable soil layers would be removed during excavation for the proposed subterranean parking structure. In addition, based on the Soils and Geology Report, and a liquefaction analysis performed, the soils below the subterranean subgrade are not considered to be prone to liquefaction. Thus, the Project’s impact associated with liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.40 According to the Soils and Geology Report, the soils underlying the Project Site are not considered prone to hydroconsolidation (also known as soil collapse). Therefore, the Project’s impact related to collapse would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide.

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lateral spreading, subsidence, liquefaction, or collapse. The impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Based on the Soils and Geology Report, on-site geologic materials are in the very low to very high expansion range. Specifically, the upper soils were found to have a very high expansion index while soils below a depth of 12.5 feet were observed to have a very low to low expansion index. As previously discussed, the Project would involve excavations to a depth of approximately 72.5 feet. As such, the upper soils with a very high expansion index would be removed as part of the Project. In addition, the Project would be designed in accordance with regulations set forth by the LABC, which would address specific requirements of sites with expansive soils. Therefore, through standard construction practices involving excavation activities and the associated removal of underlying soils, as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed. Thus, with compliance with existing regulatory requirements, the Project would not create substantial direct or indirect risks to life or property due to expansive soils. The impact related to expansive soils would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Less Than Significant Impact.** Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site included in Appendix IS-4 of this Initial Study indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, according
to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site. Based on the records search, the Project Site contains surficial deposits that consist of younger Quaternary Alluvium. These younger Quaternary Alluvium deposits typically do not contain significant vertebrate fossils in the uppermost layers, but are underlain by older Quaternary deposits at varying but relatively shallow depths that do contain significant vertebrate fossil remains. The closest vertebrate fossil locality in these older Quaternary sediments is LACM 7672, north of the Project Site at the intersection of 3rd Street and San Vicente Boulevard, that produced fossil specimens of deer, Cervidae, elephantoid, and Proboscidea at unstated depth. As detailed in the paleontological records search included in Appendix IS-4 of this Initial Study, other vertebrate fossils have been found in the surrounding area at varying depths ranging from 13 feet to 30 feet below the surface. In summary, the paleontological records search indicates that shallow excavations in the younger Quaternary Alluvium deposits on the Project Site are unlikely to discover significant vertebrate fossils. However, according to the paleontological records search, deeper excavations have the potential to encounter significant remains of fossil vertebrates.

As discussed above, grading to a maximum depth of approximately 72.5 feet would occur within the Project Site in order to develop the Project. Thus, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. Pursuant to the City’s Condition of Approval for an Inadvertent Discovery, in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Therefore, with compliance with City’s Condition of Approval for an Inadvertent Discovery with regard to paleontological resources, the Project’s impact on paleontological resources would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. No impact related to unique geologic features would occur, and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

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Would the project:

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

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

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

**Potentially Significant Impact.** As the Project would have the potential to emit GHGs during construction and operation activities, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (e.g., Assembly Bill 32, the City’s Green Building Code, and the Southern California Association of Governments [SCAG] Regional Transportation Plan/Sustainable Communities Strategy).

**IX. HAZARDS AND HAZARDOUS MATERIALS**

Would the project:

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

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

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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 or excessive noise for people residing or working in the project area?

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

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g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

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The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by Citadel Environmental Services, Inc., dated June 28, 2017. This report is included as Appendix IS-5 of this Initial Study.

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

**Less Than Significant Impact.** The Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers’ specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the City of Los Angeles.
Department of Building and Safety (LADBS). Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and church uses, including cleaning products, paints, and those used for maintenance of landscaping and pools. Such use would be consistent with that currently occurring on the Project Site and at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Given the type of development proposed, operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project’s impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. The Project Site is currently developed with a cathedral, ancillary church buildings, and a surface parking area. The Project Site contains structures dating back to 1937. As such, based on the age of the existing structures, it is likely that asbestos containing materials (ACM) and/or lead-based paints (LBP) were likely used in the construction of the cathedral and the existing ancillary church buildings. Thus, demolition and excavation activities could potentially expose ACMs or LBPs or result in other significant hazards to the public. The Project Site is also located within a City-designated Methane Zone. As such, there is a potential methane hazard at the Project Site due to the proximity of a methane gas source. Furthermore, according to the Phase 1 ESA, two off-site monitoring wells for Merry Go Round Cleaners were identified along South Holt Avenue and South San Vicente Boulevard. The monitoring well on South Holt Avenue, MW-14, was removed in May 2015 based on the levels of tetrachloroethylene (PCE) detected in the upper aquifer. The monitoring well located on South San Vicente Boulevard, MM-13, is approximately 18 feet east of the Project Site and contained PCE at concentrations of 25.9 microgram per liter in the lower aquifer in 2015. Due to the well’s proximity to the Project Site, the groundwater at the Project Site is likely contaminated with PCE, and a related soil vapor condition may exist. Therefore, further analysis in the EIR is required to determine the Project’s potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
Less Than Significant Impact. There are no schools within one-quarter mile of the Project Site. The nearest school to the Project Site is the Temple Emanuel of Beverly Hills, located approximately 0.8 mile west of the Project Site at 8844 Burton Way. As discussed above in Response to Checklist Question VIII.a, Project construction would have the potential to emit and would involve the handling of hazardous materials. However, the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements. Additionally, the Project operation would involve the limited use of hazardous materials typically used in the maintenance of residential, office, and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers’ specifications and in compliance with applicable federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project’s emission or handling of hazardous materials and wastes within one-quarter mile of a school would be less than significant. No mitigation measures and no further analysis of this topic in an EIR are required.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Less Than Significant Impact. Section 65962.5 of the Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. According on the Phase I ESA, the Project Site is listed on the Environmental Database Resources Historic Gas Stations (EDR Hist Auto) database based on the Project Site’s identification as a former automotive repair shop in 1999 and a historical gas station between 2001 and 2003. However, that is incorrect because the Project Site has been used exclusively for church purposes since the late 1930s. In addition, based on a review of building permits, city directories and aerial photographs, the Phase I ESA found no indication that the Project Site operated as a gas station between 2001 and 2003. Furthermore, the Project Site was not identified on the City of Los Angeles Fire Department’s (LAFD) list of active and inactive aboveground and underground storage tanks and hazardous materials inventories. As such, the listing is in error and not considered to represent the Project Site. Therefore, the Project would not create a significant hazard to the public or the environment from the Project Site’s location on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. This impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of an airport. The closest airports to the Project Site are Santa Monica Municipal Airport, located approximately 7.4 miles southwest of the Project Site and Los Angeles International Airport, located approximately 9.5 miles south of the Project Site. Given the distance between the Project Site and the nearest airports,
the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City’s General Plan, none of the streets directly adjacent to the Project Site are designated disaster routes. The nearest designated disaster route to the Project Site is La Cienega Boulevard, which is located approximately 0.2 mile east of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not require the permanent closure of any local public streets, and vehicular access to the Project Site would be provided from the publicly-accessible alley that abuts the Project Site to the north, as well as a drop-off area along Burton Way. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. As a result, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City’s designated disaster routes such that it would impair the implementation of the City’s emergency response plan. Therefore, the Project’s impact related to the implementation of the City’s emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed and rehabilitated in accordance with Los Angeles Municipal Code (LAMC) requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects; and Section 57.507.3.1 of the LAMC establishes fire water flow standards. Additionally, the proposed residential and church uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

41 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed April 9, 2019. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

42 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.
X. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

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b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

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c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

  i. Result in substantial erosion or siltation on- or off-site;

  1. ☐ ☐ ☒ ☐

  ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

  1. ☐ ☐ ☒ ☐

  iii. 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; or

  1. ☐ ☐ ☒ ☐

  iv. impede or redirect flood flows?

  1. ☐ ☐ ☒ ☐

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

  1. ☐ ☐ ☒ ☐

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

  1. ☐ ☐ ☒ ☐

The following analysis is based, in part, on the Water Resources Technical Report prepared for the Project by KPFF Consulting Engineers, dated June 19, 2019. This report is included as Appendix IS-6 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed in the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As Project construction would disturb less than one acre of soil, the Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. However, the Project would be required to implement Best Management Practices (BMPs) as part of the City’s grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sedimentation and erosion.

As previously noted, construction activities for the Project would include demolition of an existing multi-story building, hardscape and landscape areas, excavating down to a depth of 72.5 feet below ground surface. As provided in the Soils and Geology Report included as Appendix IS-3 of this Initial Study, the site-specific liquefaction analysis conducted for the Project Site considers the historically highest groundwater level of 10 feet and the current groundwater level of 18 feet. Thus, Project construction activities are expected to encounter groundwater which could require dewatering. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of site-specific BMPs included as part of the Erosion Control Plan required to comply with the City grading permit regulations, the Project would significantly reduce or eliminate the discharge of potential pollutants from the stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.
Operation

Under the City’s Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., “first flush”). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the “first flush” storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City’s LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing site is 86.2-percent impervious and consists of buildings, paved surface lots, and landscape areas. Implementation of the Project would slightly increase the impervious surfaces to 86.8 percent. As discussed in the Water Resources Technical Report, the existing Project Site was developed prior to the enforcement of stormwater quality BMP design, implementation, and maintenance, and the Project Site does not appear to include BMPs or measures to treat stormwater runoff. As such, stormwater currently flows from the Project Site without any treatment. However, the Project includes the installation of a capture and use and/or biofiltration system, which would control stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are expected to encounter groundwater and temporary dewatering is anticipated. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements.

As previously discussed in Response to Checklist Question IX.b, Hazards and Hazardous Materials, above, the Phase I ESA prepared by Citadel documented that groundwater beneath the Project Site had been impacted by dry cleaning chemicals from the former Merry Go Round Cleaner that exceed maximum contaminant levels regulatory thresholds for drinking water. However, as previously discussed, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal
Watersheds of Los Angeles and Ventura Counties. Therefore, Project construction could potentially improve the existing condition by removing impacted groundwater. In addition, the proposed construction activities would be typical of a residential project and would not involve activities that could further impact the underlying groundwater quality.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of an UST. As previously described, however, no existing USTs are anticipated to be found beneath the Project Site. Therefore, the removal of USTs would not pose a significant hazard on groundwater quality.

In addition, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, as discussed above, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants. In addition, while the Project would introduce more density and an additional land use (residential) to the Project Site which would slightly increase the use of potentially hazardous materials as described above, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project also does not include the installation or operation of water wells, or any extraction or recharge system near the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility.

In addition, the Project includes the installation of a capture and use and/or biofiltration system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality. The Project’s potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
Less Than Significant Impact. As discussed above, construction activities for the Project would include demolition of an existing multi-story building, hardscape and landscape areas, and excavation to a depth of 72.5 feet below ground surface. Temporary dewatering operations are expected based on the groundwater encountered at 18 feet below the existing grade. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Regarding groundwater recharge, the Project Site is currently mostly impervious with approximately 86.2-percent impervious surfaces. Therefore, there is currently low groundwater recharge potential. While operation of the Project would slightly increase the impervious areas of the site from 86.2 percent to 86.8 percent, the underground footprint of the Project’s improvements and landscaping would span property line to property line, and therefore the groundwater recharge potential would remain minimal. As stated above, the volume greater than the first flush of stormwater, which bypasses the BMP systems, would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. As such, the Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Coastal Plain Groundwater Basin.

Therefore, the Project’s potential impact on groundwater supplies and groundwater recharge would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

The Project Site is comprised of approximately 86.2-percent impervious surfaces under existing conditions. With implementation of the Project, the amount of impervious area would increase to
approximately 86.8 percent. As such, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. There are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, under the City’s LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., “first flush”). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, while the Project would slightly increase impervious surfaces compared to existing conditions, with implementation of BMPs the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. 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; or

Less Than Significant Impact. The Project Site is currently developed and generally consists of impervious surface parking, buildings, impervious pavement for pedestrian and vehicular circulation, and landscaped areas. The Project Site is 86.2-percent impervious and is not crossed by any water courses or rivers. Currently, stormwater runoff from the Project Site is conveyed by sheet flow towards the south and is collected in catch basins either on Burton Way or South San Vicente Boulevard. Specifically, as discussed in the Water Resources Technical Report included as Appendix IS-6, based on available record data and visual observations, there is an existing 48-inch reinforced concrete pipe along Burton Way between Holt Avenue and South San Vicente Boulevard that flows towards the southeast. The underground pipe and catch basins in Burton Way are owned and maintained by the City of Angeles. In
addition, an existing Los Angeles County-owned 12-foot by 6-foot storm drain box is located along South San Vicente Boulevard and flows toward the southeast.

As previously discussed, operation of the Project would increase the impervious surface area within the Project Site from 86.2 to 86.8 percent. The Project would include the installation of building roof drain downspouts, area drains, and planter drains to collect roof and site runoff. The Project would also direct stormwater away from buildings through a series of storm drain pipes. Furthermore, based on the volumetric flow rate analysis provided in the Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rate indicated that there would be no increase in stormwater runoff. In addition, the implementation of BMPs required by the City’s LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

Less Than Significant Impact. As described in the Water Resources Technical Report and shown on Figure 10 of the report, the Project Site is located within a 0.2-percent annual chance floodplain area, as identified in Zone X (shaded) in the Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA). In addition to the low risk of flooding, the Project would implement a capture and use and/or biofiltration system BMPs and a stormwater conveyance system. Thus, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows. As such, no impacts would occur, and no further analysis of this topic in an EIR is required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes.

According to the City of Los Angeles General Plan Safety Element, the Project Site is not located in an area potentially impacted by a tsunami but is located in the potential dam inundation area of Lower Franklin Reservoir. The reservoir is located 2.5 miles away from the Project and has a 200 acre-feet capacity. The reservoir can be drained to half-capacity in 72 hours and can be drained completely in 216 hours. Therefore, as described in the Water Resources Technical Report prepared for the Project, in

43 Based on FIRM Number 06037C1585F, effective on 09/26/2008.
44 Shaded Zone X depicts areas of 0.2-percent annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
45 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.
the event of a breach, the released water would significantly dissipate by the time it reached the Project Site.\(^{46}\) Moreover, the risk of a breach is very low. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. The Division's inspectors may require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. These dams are under continuous monitoring for safety against failure. In addition, the LADWP operates the Lower Franklin Reservoir and other dams in the Project area and mitigates the potential for overflow and seiche hazards through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. The City’s Local Hazard Mitigation Plan, adopted in 2011 and updated in 2018, evaluates dam failure vulnerability and classifies dam failure as a moderate risk rating.\(^{47}\) However, this Local Hazard Mitigation Plan also describes existing programs, proposed activities and specific projects that assist the City in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. For these reasons, the risk of release of pollutants due to project flooding from inundation by a seiche or dam failure is considered very low. Moreover, even if water from the reservoir reached the Project Site, given the relatively small size of the Project Site and the contemplated new residential use, any pollutants released are not anticipated to be substantial.

As previously described, the Project Site is located within a 0.2-percent annual chance floodplain area identified in FEMA’s Flood Insurance Rate Maps.\(^{48,49}\) In addition to the low risk of flooding, the Project includes capture and use and/or biofiltration system BMP and a stormwater conveyance system, which would be improve upon the existing site devoid of treatment and on-site detention. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Based on the above, impacts related to the release of pollutants from the Project due to inundation would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Water Resources Technical Report, the Project Site is located within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under

\(^{46}\) Beverly Hills General Plan Technical Background Report, Chapter 6, Community Health and Safety, p. 6-29.
\(^{47}\) City of Los Angeles Emergency Management Department, Local Hazard Mitigation Plan, January 2018.
\(^{48}\) Based on FIRM Number 06037C1585F, effective on 09/26/2008.
\(^{49}\) Shaded Zone X depicts areas of 0.2-percent annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.
California’s Clean Water Act Section 303(d) List include Cadmium (sediment), Chlordane (Tissue & Sediment), Coliform Bacteria, Copper (Dissolved), Cyanide, DDT, Lead, PAHs, PCBs, Selenium, Sediment Toxicity, Shellfish Harvesting Advisory, Silver, Toxicity, Trash, Viruses (Enteric), and Zinc. No Total Maximum Daily Load (TMDL) data have been recorded by EPA for this waterbody.

As described above in Response to Checklist Question X.a, based on observation of existing conditions, stormwater currently discharges from the Project Site without treatment or on-site detention. Thus, the Project’s implementation of capture and use and/or biofiltration system BMPs would minimize the release of anticipated and potential pollutants generated by the Project (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). As the Project would only slightly increase the amount of impervious area from 86.2 to 86.8 percent, implementation of the LID BMP measures on the Project Site would result in an improvement in surface water quality runoff when compared to existing conditions.

As such, the Project would not conflict with or obstruct any water quality control plans. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant Impact with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

Would the project:

a. Physically divide an established community? ☐ ☐ ☒ ☐

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☒ ☐ ☐ ☐

a. Would the project physically divide an established community?

**Less Than Significant Impact.** As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area characterized by a mixture of low-, mid- and high-rise buildings occupied primarily by a mix of residential and commercial uses. Land uses located adjacent to the Project Site include an 11-story residential condominium building to the north (across a publicly-accessible alley) and the Cedars Sinai Medical Center to the north of the condominium building; a three-story retail building and parking structure\(^{50}\) to the east across San Vicente Boulevard; two- and

\(^{50}\) The City has approved entitlements to replace the existing development with a with a new, higher-density, mixed-use project with residential and retail uses (approved through Case No. CPC-2015-896-GPA-VZC-HD-MCUP-ZV-DB-SPR). Based on approval of that case and associated Ordinance No. 184,720 (effective March 8, 2017), the zoning for this property is now (T)(Q)C2-2D-O with a General Commercial land use designation.
Consistent with existing and approved development along the San Vicente Boulevard corridor, the Project includes the development of 153 apartment units in a new residential building, the rehabilitation and limited alteration of the existing cathedral and the replacement of the existing ancillary church buildings with a new ancillary church building. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not require the vacation of any surrounding streets adjacent to the Project Site. In addition, the Project does not involve the construction of any large infrastructure within or surrounding the Project Site that could physically divide the surrounding community. Therefore, the Project would not physically divide an established community. The Project’s impact related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

<table>
<thead>
<tr>
<th>Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
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<tr>
<td>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?</td>
<td>☐</td>
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</tbody>
</table>

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

No Impact. No mineral extraction operations currently occur on the Project Site. In addition, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California
The Project Site is located within a City-designated oil field or oil drilling area. According to the California Division of Oil, Gas and Geothermal Resources, the Project Site is also located within the limits of the San Vicente and Salt Lake Oil Fields. However, the nearest oil well is located approximately 200 feet northeast of the Project Site and is currently inactive and plugged. Moreover, the Project Site does not currently include any oil drilling activities. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. See Response to Checklist Question XII.a, Mineral Resources, above.

XIII. NOISE

<table>
<thead>
<tr>
<th>Impact Description</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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</thead>
<tbody>
<tr>
<td>a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</td>
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<td>☐</td>
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<tr>
<td>b. Generation of excessive groundborne vibration or groundborne noise levels?</td>
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<tr>
<td>c. For a project located within the vicinity of a private airstrip or 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?</td>
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51 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.


53 City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

54 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

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

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip, an airport land use plan, or within two miles of an airport. The closest airports to the Project Site are Santa Monica Municipal Airport, located approximately 7.4 miles south of the Project Site, and Los Angeles International Airport, located approximately 9.5 miles southwest of the Project Site. As such, the Project would not expose people residing or working in the project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**XIV. POPULATION AND HOUSING**

<table>
<thead>
<tr>
<th>Would the project:</th>
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<tbody>
<tr>
<td>a. <strong>Induce substantial unplanned 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)?</strong></td>
</tr>
<tr>
<td>b. <strong>Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</strong></td>
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<table>
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<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
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</tbody>
</table>
a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**Less Than Significant Impact.** The Project includes the development of 153 new residential units within the Project Site, the rehabilitation of the existing cathedral, and the replacement of the existing ancillary church buildings with a new ancillary church building. The construction of new residential units would increase the residential population within the Project Site and vicinity. The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department, population and household data from the California Department of Finance, and extensive input from local jurisdictions in SCAG’s planning area. The Project Site is located in SCAG’s City of Los Angeles Subregion.

According to SCAG’s 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 is approximately 4,036,475 persons. In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons. Therefore, the projected population growth between 2019 and 2024 is approximately 136,411 persons. Based on a household size factor of 2.6 persons per household and 153 units, the Project could generate a new residential population of approximately 398 residents. The estimated 398 new residents generated by the Project would represent approximately 0.29 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2024. The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project’s residents would be well within SCAG’s population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2019 is approximately 1,416,700 households. In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,481,843 households. Therefore, the projected household growth in the City between 2019 and 2024 is approximately 65,143 households. The Project’s 153 residential households added by the Project would constitute approximately 0.23 percent of the housing growth forecasted between 2019 and 2024. Therefore, the Project’s households would be well within SCAG’s household projection for the City of Los Angeles Subregion.

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56 Based on a linear interpolation of 2012–2040 data.
57 Based on a linear interpolation of 2012–2040 data.
58 Based on a 2.6 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2013–2017), per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 27, 2019.
59 Based on a linear interpolation of 2012–2040 data. SCAG forecasts “households,” not housing units. As defined by the U.S. Census Bureau, “households” are equivalent to occupied housing units.
60 Based on a linear interpolation of 2012–2040 data.
The new residential use would not increase the number of church employees on the Project Site. Moreover, the cathedral rehabilitation and replacement of existing ancillary church buildings with a new church building would not materially increase the number of church employees on the Project Site. Therefore, the Project would not result in a substantial number of new church employees on the Project Site that could generate an associated indirect demand for new housing in the area and induce substantial population growth. As analyzed above, the net new population and housing generated by the Project would be within SCAG’s population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth. The Project’s impact related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the Project would not cause the displacement of any existing people or housing. In addition, the Project would not require the construction of housing elsewhere. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XV. PUBLIC SERVICES

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

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<th>Service</th>
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<td>a. Fire protection?</td>
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<td>b. Police protection?</td>
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<td>c. Schools?</td>
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<td>d. Parks?</td>
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<td>e. Other public facilities?</td>
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a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Potentially Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The Project would increase the building square footage on-site and the residential population within the service area. This could result in
the increased demand for fire protection services and associated facilities, the construction of which might result in adverse physical impacts. Therefore, further analysis of this issue will be included in the EIR.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would increase the residential population in the service area. This could result in the need for additional police services and associated facilities, the construction of which might result in adverse physical impacts. Therefore, the EIR will provide further analysis of this issue.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

**Less Than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The LAUSD is divided into six local districts. The Project Site is located in Local District—West. The Project Site is currently served by two elementary schools (Rosewood Avenue Elementary Urban Planning/Design Magnet and West Hollywood Elementary), one middle school (John Burroughs Middle School), and one high school (Fairfax Senior High). The Project includes the construction of 153 residential units. Based on LAUSD Student Generation rates, the Project would result in approximately 84 elementary students, 14 middle school students, and 24 high school students in the project area, for a total of approximately 122 students. As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents, who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options that may be available to Project-generated students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers, which are open to qualified students in the LAUSD;

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64 Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 15.
• The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

• Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student’s parent is regularly employed if there is adequate capacity available at the school;

• Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and

• Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

In addition, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project’s building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Therefore, payment of the applicable development school fees to LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Overall, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, the Project’s impact on schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks (RAP). The three closest parks and recreational facilities to the Project Site include the Carthay Circle Park, located approximately 0.91 mile southeast of the Project Site, La Cienega Park located approximately 1.3 miles south of the Project Site, and the Pan Pacific Park and Recreation Center, located approximately 2.1 miles east of the Project Site. Carthay Circle Park includes a small grass area and a bench. La Cienega Park includes the following: baseball diamonds, two of which covert to soccer fields seasonally; a jogging track; a pavilion featuring outdoor exercise equipment; a children’s play area; barbecue grills, a picnic area; a snack bar; and a community center. Pan Pacific Park and Recreation Center includes the following: barbecue pits; a lighted baseball diamond; lighted, indoor basketball courts; a children’s play area; picnic tables; amphitheater; multipurpose sports field; outdoor fitness equipment stage; unlighted, outdoor basketball courts; and jogging paths.

The Quimby Act, codified in Government Code Section 66477, was enacted in 1965 in an effort to promote the availability of park and open space areas in California and respond to the increased rate of
urbanization and need for open space. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Within the City, the Quimby Act is implemented by Los Angeles Municipal Code (LAMC) Section 12.33, which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The Quimby Act permits the City to require parkland dedications not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and/or in-lieu fee payments for residential development projects.

In September 2016, the City amended LAMC Section 12.33 (the Park Ordinance), and those amendments became effective January 11, 2017. The aim of the amended Park Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The amended Park Ordinance increased Quimby fees, provided a new impact fee for non-subdivision projects, eliminated the deferral of park fees for market rate projects that include residential units, increases the fee-spending radii from the site from which the fee is collected, provided for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updated the provisions for credits against park fees.

As previously described, the Project includes the construction of 153 residential units. As the Project would not materially increase the number of church employees, the discussion here is limited to the Project’s residential component. Based on a household size factor of 2.6 persons per household, development of the proposed 153 residential units would result in an increase of approximately 398 residents. As discussed in Section 3, Project Description, of this Initial Study, the Project includes a total of approximately 16,800 square feet of usable open space amenities in and around the residential building. Specifically, Level 4 of the building includes 9,200 square feet of common open space, including a 676-square-foot indoor fitness room and 1,266-square-foot recreation center, a 5,242-square-foot outdoor recreation deck, and a 2,016-square-foot pool deck. Outdoor common open space amenities also include barbecue stations, a spa, pool, firepit areas, and informal seating. The Project also includes private open space amenities, including four approximately 100-square-foot patios for the ground-floor residences and 144 approximately 50-square-foot balconies for the residences on all other levels of the residential building.

Due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would often utilize the on-site open space and common areas to meet their recreational needs. While the Project’s residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to generate a substantial increase in the demand for parks or recreational facilities.

In any event, the Applicant would satisfy the applicable requirements of the LAMC Section 12.33 by paying the applicable in-lieu park fees for the residential component of the Project and/or dedicating

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65 Ordinance No. 184505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.

66 Based on a 2.6 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2013-2017) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 27, 2019.
park land. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. This impact would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Potentially Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources. The nearest libraries to the Project Site include the West Hollywood Library located approximately 1.4 miles north of the Project Site, the Beverly Hills Library located approximately 1.6 miles west of the Project Site, the Fairfax Branch Library located approximately 2.1 miles east of the Project Site, and the Robertson Branch Library located approximately 2.3 miles south of the Project Site.

As previously discussed, the Project is anticipated to generate approximately 372 new residents at the Project Site, which would increase the service population of the libraries serving the Project Site. This could result in the need for additional library services. Therefore, the EIR will provide further analysis of this issue.

XVI. RECREATION

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

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

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

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d, while the population increase associated with the Project could generate additional demand for parks and

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67 Los Angeles Public Library, Library Directory.
recreational facilities in the vicinity of the Project Site, the Project would comply with the City’s requirements in Los Angeles Municipal Code (LAMC) Section 12.33 through the payment of in-lieu park fees and/or the dedication of park land with regard to the residential component of the Project. In addition, the Project would comply with applicable open-space requirements with respect to the Project’s residential component. Specifically, LAMC Section 12.21 G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 16,800 square feet of usable open space with respect to the residential building. The Project includes a total of 16,800 square feet of usable open space and meets the requirements of the LAMC.

Overall, due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project’s residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, as discussed in the response to Checklist Question XV.d, Public Services—Parks, above, the Applicant would be required to pay in-lieu park fees and/or dedicate park land with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the project resident’s use of existing parks and recreational facilities and/or address any deterioration of those facilities. Therefore, the Project’s impact on parks and recreational facilities would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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?

No Impact. The Project would not include recreational facilities or require the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, no impact would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

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Our Lady of Mt. Lebanon Project  
Initial Study  
City of Los Angeles  
August 2019
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?

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

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d. Result in inadequate emergency access?

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a. Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

**Potentially Significant Impact.** Construction of the Project would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, Project construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project’s residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area’s transportation facilities could conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

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

**Potentially Significant Impact.** While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines Section 15064.3(b), which relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. As previously discussed, the Project would introduce a new residential population, which would increase the number of residents using the area’s transportation facilities compared to existing residents. Additionally, the Project’s employees and visitors would generate vehicle trips throughout the day. Therefore, this topic will be further evaluated in the EIR. The analysis will be based on LADOT’s adopted methodology under its Transportation Impact Study Guidelines, which requires use of level of service (LOS) to evaluate the traffic impacts of a project.

c. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
No Impact. The Project’s design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, no potential impacts related to a substantial increase in hazards due to a geometric design feature or incompatible uses would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the Project result in inadequate emergency access?

Less Than Significant Impact. According to the Safety Element of the City’s General Plan, the nearest designated disaster route to the Project Site is La Cienega Boulevard, which is located approximately 0.2 mile east of the Project Site. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from San Vicente Boulevard and Burton Way. In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access within the project vicinity or cause an impediment along the City’s designated disaster routes, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

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

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

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

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

Potentially Significant Impact. Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, which is part of the CEQA statute. As specified in AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 72.5 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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<td>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</td>
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b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

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c. 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?

|                      |                                                        | ☒                            | ☐         | ☑         | ☐         |

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

|                      |                                                        | ☒                            | ☐         | ☑         | ☐         |

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

|                      |                                                        | ☒                            | ☐         | ☑         | ☐         |

a. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

**Potentially Significant Impact (Water, storm water, electric power, natural gas and telecommunication facilities)/Less Than Significant Impact (Wastewater).** Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project’s increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, natural gas, and telecommunications facilities demand, further analysis of these topics in an EIR will be provided.

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, implementation of the Project would not increase storm water flow from the Project Site such that there would be an increase in the rate or amount of surface runoff. Therefore, no further analysis of this issue in an EIR is required.

Wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems in the vicinity of the Project Site for treatment at the Hyperion Water Reclamation Plant. The Hyperion Water Reclamation Plant has a capacity of 450 million gallons per day and current wastewater flow levels are at 275 million gallons per day.\(^{68}\) Accordingly, the remaining available capacity at the

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Hyperion Water Reclamation Plant is approximately 175 million gallons per day. As shown in Table 3 on page 88, based on sewage generation factors established by the Los Angeles Bureau of Sanitation (LASAN), the existing church uses are estimated to generate a maximum wastewater flow of approximately 3,524 gallons per day. Based on the Wastewater Report prepared for the Project (included in Appendix IS-7 of this Initial Study), the Project would generate a maximum wastewater flow of approximately 39,648 gallons per day upon completion. After accounting for the existing total Project Site wastewater generation, the Project would result in a net increase in maximum wastewater flows of approximately 36,124 gallons per day. The net increase in maximum wastewater flow of 36,124 gallons per day represents approximately 0.02 percent of the remaining available capacity of 175 million gallons per day at the Hyperion Water Reclamation Plant. Therefore, the Project-generated wastewater would be accommodated by the remaining available capacity of the Hyperion Water Reclamation Plant.

Sewer service for the Project would be provided utilizing existing on-site sewer connections to the existing sewer mains adjacent to the Project Site. As discussed in the Wastewater Report, there is a 15-inch sewer line in the alley between Holt Avenue and San Vicente Boulevard, with a capacity of 894,973 gallons per day. Based on the Sewer Capacity Availability Request (SCAR) prepared for the Project, provided in Appendix IS-7 of this Initial Study, the existing 15-inch sewer line would have adequate capacity to accommodate the Project. Specifically, the City has analyzed the Project’s demand in conjunction with existing conditions and forecasted growth and has approved the Project to discharge up to 39,648 gallons per day, which is consistent with the Project’s maximum wastewater flow and exceeds the Project’s net increase in sewage generation of approximately 36,124 gallons per day. Should the City determine that additional sewer connections and sewer infrastructure capacity is needed to meet the demands of the Project, the Applicant would implement such improvements in consultation with the City.

Based on the above, the Project’s impact on wastewater treatment facilities would be less than significant impact, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.
### Table 3
Estimated Project Wastewater Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>No. of Units/Floor Area</th>
<th>Generation Rate&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Sewage Generation Demand (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Existing</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Church</td>
<td>288 seats</td>
<td>3 gpd/seat</td>
<td>864</td>
</tr>
<tr>
<td>Parish Rectory</td>
<td>1 unit</td>
<td>230 gpd/unit</td>
<td>230</td>
</tr>
<tr>
<td>Social Hall Building</td>
<td>5,426 sf</td>
<td>350/1,000 gpd/sf</td>
<td>1,899</td>
</tr>
<tr>
<td>Office</td>
<td>4,424 sf</td>
<td>120/1,000 gpd/sf</td>
<td>531</td>
</tr>
<tr>
<td><strong>Total Existing</strong></td>
<td></td>
<td></td>
<td>3,524</td>
</tr>
<tr>
<td><strong>Proposed</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential Apt: Studio</td>
<td>13 du</td>
<td>75 gpd/du</td>
<td>975</td>
</tr>
<tr>
<td>Residential Apt: 1 BD</td>
<td>80 du</td>
<td>110 gpd/du</td>
<td>8,800</td>
</tr>
<tr>
<td>Residential Apt: 2 BD</td>
<td>60 du</td>
<td>150 gpd/du</td>
<td>9,000</td>
</tr>
<tr>
<td>Multi-Purpose Room&lt;sup&gt;b&lt;/sup&gt;</td>
<td>7,285 sf</td>
<td>350/1,000 gpd/sf</td>
<td>2,550</td>
</tr>
<tr>
<td>Lobby&lt;sup&gt;c&lt;/sup&gt;</td>
<td>1,110 sf</td>
<td>50/1,000 gpd/sf</td>
<td>56</td>
</tr>
<tr>
<td>Food Prep Kitchen&lt;sup&gt;d&lt;/sup&gt;</td>
<td>1,790 sf</td>
<td>300/1,000 gpd/sf</td>
<td>537</td>
</tr>
<tr>
<td>Lease Office&lt;sup&gt;e&lt;/sup&gt;</td>
<td>210 sf</td>
<td>120/1,000 gpd/sf</td>
<td>25</td>
</tr>
<tr>
<td>Swimming Pool</td>
<td>—</td>
<td>13,296 gal</td>
<td>13,296</td>
</tr>
<tr>
<td>Jacuzzi&lt;sup&gt;f&lt;/sup&gt;</td>
<td>—</td>
<td>2,094 gal</td>
<td>2,094</td>
</tr>
<tr>
<td>Fitness Room&lt;sup&gt;g&lt;/sup&gt;</td>
<td>676 sf</td>
<td>650/1,000 gpd/sf</td>
<td>439</td>
</tr>
<tr>
<td>Vestibule, Cry Room, Reception Waiting Area, and Recreational Room&lt;sup&gt;h&lt;/sup&gt;</td>
<td>2,284 sf</td>
<td>50/1,000 gpd/sf</td>
<td>114</td>
</tr>
<tr>
<td>Office and Meeting Rooms&lt;sup&gt;i&lt;/sup&gt;</td>
<td>6,730 sf</td>
<td>120/1,000 gpd/sf</td>
<td>808</td>
</tr>
<tr>
<td>Library/Activity Room&lt;sup&gt;j&lt;/sup&gt;</td>
<td>718 sf</td>
<td>50/1,000 gpd/sf</td>
<td>36</td>
</tr>
<tr>
<td>Church</td>
<td>306 seats</td>
<td>3 gpd/seat</td>
<td>918</td>
</tr>
<tr>
<td><strong>Total Proposed by Project</strong></td>
<td></td>
<td></td>
<td>39,648</td>
</tr>
<tr>
<td><strong>Project Net Wastewater Generation (Proposed – Existing)</strong></td>
<td></td>
<td></td>
<td><strong>36,124</strong></td>
</tr>
</tbody>
</table>

<sup>a</sup> This analysis is based on sewage generation rates provided LASAN (2012).

<sup>b</sup> Multi-Purpose Room is considered as “Banquet Room/Ballroom” for sewer generation purposes.

<sup>c</sup> Lobby and church lobby are considered as “Lobby of Retail Area” for sewer generation purposes.

<sup>d</sup> Food Prep Kitchen is referred to as “Restaurant: Take Out” in Utility Report. Food Prep Kitchen proposed by the Project is not considered a restaurant and would support Multi-Purpose Room and/or used for events following church services.

<sup>e</sup> Lease office is considered as “Office Building” for sewer generation purposes.

<sup>f</sup> Jacuzzi considered as “Swimming Pool” for sewer generation purposes.

<sup>g</sup> Fitness room considered as “Health Club/Spa” for sewer generation purposes.

<sup>du</sup> dwelling units

<sup>gpd</sup> gallons per day

<sup>sf</sup> square feet

All totals have been rounded and may not sum due to rounding.
Table 3 (Continued)
Estimated Project Wastewater Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>No. of Units/Floor Area</th>
<th>Generation Ratea</th>
<th>Sewage Generation Demand (gpd)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vestibule, cry room, reception waiting area and recreational room considered as “Lounge” for sewer generation purposes.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Church Office and Meeting Rooms considered as “Conference Rooms” for sewer generation purposes.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Library/Activity Room is referred to as “Library” in Utility Report. Proposed Library would not be open to the public and would be connected to the church lobby.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


b. Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Potentially Significant Impact.** The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. Given the Project’s increase in floor area and introduction of new uses on the Project Site, the Project would result in an increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

**Less Than Significant Impact.** As discussed above in Response to Checklist Question XIX.a, the Hyperion Water Reclamation Plant has a current available capacity of 175 million gallons per day. The Project’s net increase in average daily wastewater flows of approximately 36,124 gallons per day would represent approximately 0.02 percent of the available capacity of the Hyperion Water Reclamation Plant. Therefore, based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, the Project’s impact on the wastewater treatment provider would be less than significant impact, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**Less Than Significant Impact.** While the Bureau of Sanitation (LASAN) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings,
and earth-like waste are disposed of in inert waste landfills.69 Ten (10) Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.70 In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery. Of the 10 Class III landfills within the County, four landfills are open to the City of Los Angeles. These include Antelope Valley, Chiquita Canyon, Lancaster, and Sunshine Canyon landfills. Based on the County’s Integrated Waste Management Plan 2017 Annual Report, these landfills open to the City had a combined total remaining capacity of 149.77 million tons as of December 31, 2017. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 55.71 million tons of remaining capacity and an average daily in-County disposal rate of 1,057 tons per day. The following analysis quantifies the Project’s construction and operation solid waste generation.

**Construction**

The Project Site is currently developed with a cathedral, three ancillary church buildings, and a surface parking lot. Construction of the Project includes the development of 153 residential units, a rehabilitated cathedral, and a new ancillary church building that would replace the existing ancillary church buildings. Overall, the Project includes a net increase of approximately 160,862 square feet of floor area upon buildout. Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 4 on page 91, after accounting for mandatory recycling, the Project would generate approximately 336 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project’s construction solid waste disposal needs.

**Operation**

As shown in Table 5 on page 92, upon full buildout, the Project would generate approximately 341 tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City’s recyCLa franchising system, which is expected to result in a reduction of landfill disposal Citywide, with a goal of

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69 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

70 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebble Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.
Table 4
Estimated Project Demolition and Construction Waste Generation

<table>
<thead>
<tr>
<th>Building</th>
<th>Size</th>
<th>Generation Rate (lbs/sf)(^a)</th>
<th>Total (tons)(^b)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Construction Waste</strong>(^c)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential (153 du)</td>
<td>148,641 sf</td>
<td>4.38</td>
<td>326</td>
</tr>
<tr>
<td>Cathedral</td>
<td>942 sf</td>
<td>3.89</td>
<td>2</td>
</tr>
<tr>
<td>Parish Rectory/Meeting Rooms</td>
<td>7,649 sf</td>
<td>3.89</td>
<td>15</td>
</tr>
<tr>
<td>Social Hall/Multi-purpose Room</td>
<td>12,600 sf</td>
<td>3.89</td>
<td>25</td>
</tr>
<tr>
<td>Offices</td>
<td>3,400 sf</td>
<td>3.89</td>
<td>7</td>
</tr>
<tr>
<td><strong>Construction Waste Subtotal</strong></td>
<td></td>
<td></td>
<td>375</td>
</tr>
<tr>
<td><strong>Demolition Waste</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Church Ancillary Buildings</td>
<td>12,370 sf</td>
<td>155</td>
<td>959</td>
</tr>
<tr>
<td><strong>Demolition Waste Subtotal</strong></td>
<td></td>
<td></td>
<td>959</td>
</tr>
<tr>
<td><strong>Total for Construction and Demolition Waste</strong></td>
<td></td>
<td></td>
<td>1,334</td>
</tr>
<tr>
<td><strong>Total After 75-Percent Recycling</strong></td>
<td></td>
<td></td>
<td>335</td>
</tr>
</tbody>
</table>

\(du = dwelling unit\)
\(lb = pound\)
\(sf = square feet\)

\(^a\) U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.

\(^b\) Numbers have been rounded.

\(^c\) Includes only new floor area to be constructed. See ‘Proposed New Development’ column in Table A-1 of the Project Description for this Initial Study.

Source: Eyestone Environmental, 2019.

reaching a Citywide recycling rate of 90 percent by the year 2025.\(^71,72\) The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0002 percent of the remaining capacity (149.77 million tons) for the County’s Class III landfills open to the City of Los Angeles.\(^73\)

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

\(^71\) The recyCLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recyCLA, Your Plan, accessed June 24, 2019.

\(^72\) City of Los Angeles, L.A.’s Green New Deal, Sustainable City pLAn 2019.

\(^73\) \((341 \text{ tons per year/149.77 million tons per year}) \times 100 = \sim 0.0002\%\)
Table 5
Estimated Project Solid Waste Generation

<table>
<thead>
<tr>
<th>Building</th>
<th>Size</th>
<th>No. of Employees&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Solid Waste Generation Rate&lt;sup&gt;b&lt;/sup&gt;</th>
<th>Total Generation (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cathedral&lt;sup&gt;c&lt;/sup&gt;</td>
<td>19,218 sf</td>
<td>6</td>
<td>0.73 ton/emp/yr</td>
<td>4</td>
</tr>
<tr>
<td>Total Existing</td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>Proposed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential</td>
<td>153 du</td>
<td>N/A</td>
<td>2.23/du/yr</td>
<td>341</td>
</tr>
<tr>
<td>Cathedral and Ancillary Church Building&lt;sup&gt;c&lt;/sup&gt;</td>
<td>31,439 sf</td>
<td>6</td>
<td>0.73 ton/emp/yr</td>
<td>4</td>
</tr>
<tr>
<td>Total Proposed</td>
<td></td>
<td></td>
<td></td>
<td>345</td>
</tr>
<tr>
<td><strong>Total Net Increase (Proposed minus Existing)&lt;sup&gt;d&lt;/sup&gt;</strong></td>
<td></td>
<td></td>
<td></td>
<td>341</td>
</tr>
</tbody>
</table>

<sup>a</sup> Number of employees for the cathedral and ancillary church buildings provided by the Applicant.

<sup>b</sup> Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.

<sup>c</sup> This includes support staff that would also be involved in the maintenance and use of the various ancillary church buildings.

<sup>d</sup> The solid waste generated by the existing uses is subtracted from the solid waste generated by the proposed and the existing to remain, which results the net increase of solid waste that would be generated on the Project Site after completion.

Source: Eyestone Environmental, 2019.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill 939 (AB 939)), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, Assembly Bill 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero
The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed Assembly Bill 1826 (AB 1826), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, businesses that generate 8 cubic yards of organic waste per week are required to arrange for organic waste recycling services. In addition, businesses that generate 4 cubic yards of organic waste per week are required to arrange for organic waste recycling services.

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

**XX. WILDFIRE**

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ☐ ☐ ☐ ☒

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☐ ☒

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ☐ ☐ ☐ ☒

---

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

75 Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.
a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. No impact regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>✗</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

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

No Impact.

76 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, http://zimas.lacity.org/, accessed April 9, 2019. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

77 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

[ ] Potentially Significant Impact
[ ] Less Than Significant with Mitigation Incorporation
[ ] Less Than Significant Impact
[ ] No Impact

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

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

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

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

With regard to cumulative effects on agricultural and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area due to the highly urbanized area and developed nature of the City. In addition, the Project would have no impact on these resources. Cumulative impacts related to these resources would be less than significant.

Impacts related to archaeological and paleontological resources and human remains are typically assessed on a project-by-project basis. Most of the City is highly urbanized and has been disturbed in the past. In the event that archaeological and paleontological resources and human remains are uncovered, the Project and each related project would be required to comply with the City’s Conditions of Approval for Inadvertent Discovery, regulatory requirements, and any site-specific mitigation identified. Therefore, cumulative impacts related to archeological and paleontological resources and human remains would be less than significant.
Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or underlain by an existing fault. Thus, cumulative impacts related to geology and soils would be less than significant.

In terms of population and housing, the past, present and future projects would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses. As discussed in the analysis above, the Project’s increase in population and housing would be well within SCAG growth forecasts. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the projects could cause significant environmental impacts. Cumulative impacts related to population and housing would be less than significant.

With regard to public services such as schools, parks, and recreation, the development of past, present and future related projects could increase the demand for these services and facilities. However, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. In the case of schools, the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of recreation (i.e., existing neighborhood and regional parks), projects would be required by the LAMC to include amenity spaces (e.g. gyms, outdoor decks with pools, etc.) and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Therefore, cumulative impacts related to schools, parks and recreation would be less than significant.

With regard to wastewater, since the Hyperion Water Reclamation Plant is in compliance with the State’s wastewater treatment requirements, and the wastewater generated by past, present and future related projects would most likely be typical of urban uses, no industrial discharges into the wastewater system are likely to occur that would exceed the wastewater treatment requirements of the Regional Water Quality Control Board. In addition, as with the Project, other development projects would be reviewed by LASAN to determine wastewater infrastructure capacity.

With regard to cumulative effects on solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that related projects would similarly represent a minor percentage of the remaining capacity of the County’s Class III landfills open to the City. Also, the demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan annual reports, which consider the overall capacity needs for solid waste service throughout the region. Each annual Countywide Integrated Waste Management Plan report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2017 Countywide Integrated Waste Management Plan Annual Report, the County anticipates that future disposal needs can be
adequately met for the next 15 years (i.e., 2032). Therefore, cumulative impacts with respect to solid waste would be less than significant.

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

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

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

XXII. IMPACTS THAT ARE CLEARLY INSIGNIFICANT AND UNLIKELY TO OCCUR

This Initial Study has determined that, with respect to certain environmental topics, the Project would have no environmental impact or the Project’s impact would be less than significant, and, therefore, that no further evaluation of those environmental topics in an EIR is required. As discussed in this Initial Study, the environmental topics to which those less-than-significant impacts and no impacts relate include all or a portion of the checklist items for aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, wildfire, and mandatory findings of significance. Based on the analysis in this Initial Study and the underlying technical reports for the Project, the environmental topics to which those less-than-significant impacts and no impacts relate to would be clearly insignificant and unlikely to occur.