



# City of Los Angeles

Department of City Planning • Environmental Analysis Section  
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



## INITIAL STUDY Westlake Community Plan Area

### Sapphire Project

Case Number: ENV-2015-3033-MND

**Project Location:** 1324-1342 W. 5<sup>th</sup> Street, 1101-1135 W. 6<sup>th</sup> Street, and 517-521 S. Bixel Street  
Los Angeles, California 90017

**Council District:** 1

**Project Description:** The project includes the demolition of the existing structures on-site, and the development of a residential and commercial mixed-use project consisting of 369 residential apartment units and approximately 22,000 square feet of ground-floor commercial space. The Proposed Project would consist of the construction of two buildings (North Building and South Building) that would be connected by a footbridge spanning above the adjacent alleyway. The North Building would include 142 apartment units within seven levels and would on front 5<sup>th</sup> Street. The South Building would include 22,000 square feet of ground-floor retail and 227 apartment units within six levels above the ground-floor retail and would front both 6<sup>th</sup> Street and Bixel Street. The ground-floor commercial space may include retail, restaurant, coffee shop uses, and/or other uses permitted by the Specific Plan. Both buildings include seven stories above grade and two levels of subterranean parking. The Proposed Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. A total of 40,675 square feet of open space will be provided on-site; 24,600 square feet in the South Building and 16,075 square feet in the North Building. The Proposed Project would contain approximately 348,431 square feet of developed floor area.

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but may not be limited to: (1) approval of a Project Permit Compliance Approval of the Central City West Specific Plan (“CCWSP”); (2) approval of the following Specific Plan Exceptions of the Central City West Specific Plan: (a) to allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft., required by CCWSP, Section 6.F-2, (b) to allow a (0) zero-foot side yard setback for the east and west property lines for the North Building, in lieu of the 10 ft. required by CCWSP, Section 6.F-2; (c) to allow a (0) zero-foot rear yard setback for the seven-story North Building, in lieu of the 19 ft. (15 ft.+ 1 ft. above the 3rd floor) required by CCWSP Section 6.F-2; (d) to allow a (0) zero-foot rear yard setback for the South Building in lieu of the 19 ft. (15 ft. above the 3<sup>rd</sup> floor of the 7 story building) required by the CCWSP, Section 6.F-6; and (d) to deviate from the street standards of 5<sup>th</sup> Street to be consistent with the newly adopted Mobility Element; (3) A Specific Plan Project Permit Adjustment to average or reallocate the permitted density and floor area within the South Building portion of the site; (4) A Director’s Decision to allow a 10% increase in the qualifying area of interior open space up to a maximum of 35%, in lieu of 25% of the total required usable open space.

**APPLICANT:**  
Sapphire Equity, LLC

**PREPARED BY:**  
Parker Environmental Consultants

**ON BEHALF OF:**  
The City of Los Angeles  
Department of City Planning  
Environmental Analysis Section

**March 10, 2015**

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**CITY OF LOS ANGELES**  
**OFFICE OF THE CITY CLERK**  
**200 NORTH SPRING STREET, ROOM 395**  
**LOS ANGELES, CALIFORNIA 90012**  
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**  
**INITIAL STUDY AND CHECKLIST**  
**CEQA Guidelines Section 15063**

<b>LEAD CITY AGENCY</b> Los Angeles Department of City Planning	<b>ADDRESS</b> 200 N. Spring St., Room 750, Los Angeles, CA 90012	<b>DATE</b> March 10, 2016
<b>CONTACT PERSON</b> Christina T. Lee, City Planning Associate		<b>TELEPHONE NUMBER</b> (213) 473-9723
<b>RESPONSIBLE AGENCIES</b> SCAQMD, RWQCB		
<b>PROJECT LOCATION:</b> The Sapphire Project (Proposed Project) is located at 1101-1135 W. 6 <sup>th</sup> Street, 1324-1342 W. 5 <sup>th</sup> Street, and 517-521 S. Bixel Street at the northwesterly corner of the intersection of 6 <sup>th</sup> Street and Bixel Street (southern portion) and midblock on the south side of 5 <sup>th</sup> Street between Bixel Street and Lucas Avenue (northern portion), in the Central City West Specific Plan Area and the Westlake Community Plan Area in the City of Los Angeles. The Project Site encompasses approximately 1.92 acres (approximately 83,659 square feet) of land area and includes Lots 4, 5, 6, 7, 10, 11, 12, 13, 14 and 18 of the Sixth Street and Lucas Avenue Tract (APNs 5152-001-014 and 5152-001-021) and Lots 1, 2 and 3 of the Bixel Street Tract (APN 5152-001-023) (Project Site).		
<b>PROJECT TITLE/NO.</b> Sapphire Project		<b>CASE NO.</b> APCC-2015-3032-SPE-SPP-SPPA-MS-C, ENV-2015-3033-EIR
<b>PREVIOUS ACTIONS CASE NO.</b>	<input type="checkbox"/> <b>DOES have significant changes from previous actions.</b> <input type="checkbox"/> <b>DOES NOT have significant changes from previous actions.</b>	

**PROJECT DESCRIPTION**

The Applicant proposes the demolition of the existing structures on-site, which includes a three-level parking structure, one five-story commercial office and medical office building, and one four-story commercial office and medical office building, for the development of a residential and commercial mixed-use project. The Proposed Project would consist of the construction of two buildings (North Building and South Building) that would be connected by a footbridge spanning above the adjacent alleyway. The North Building would include 142 apartment units within seven levels and would on front 5<sup>th</sup> Street. The South Building would include 22,000 square feet of ground-floor retail and 227 apartment units within six levels above the ground-floor retail and would front both 6<sup>th</sup> Street and Bixel Street. The Proposed Project would have a total of 369 residential apartment units and approximately 22,000 square feet of ground-floor commercial space. The ground-floor commercial space may include retail, restaurant, coffee shop uses, and/or other uses permitted by the Specific Plan. The unit mix would include 193 studio units, 96 one-bedroom units, 56 two-bedroom units, and 24 three-bedroom units of varying sizes and configurations. Both buildings include seven stories above grade and two levels of subterranean parking. The elevation across the Project Site increases from south to north and west to east. The Proposed Project would provide required on-site vehicle and bicycle parking spaces pursuant to the LAMC. Open space courtyards and landscaping features are proposed throughout the Project Site, including 16,075 square feet of open space within the North Building and 24,600 square feet of open space in the South Building for a total of 40,675 square feet of open space on-site. In total, the Proposed Project would contain approximately 348,431 square feet of floor area.

**Project Permits/Approvals:** It is anticipated that the approvals for the Proposed Project would include, but may not be limited to:

1. Pursuant to Los Angeles Municipal Code (“LAMC”) Section 11.5.7-C, a Project Permit Compliance Approval of the Central City West Specific Plan (“CCWSP”).
2. Pursuant to LAMC Section 11.5.7-F, the Applicant requests the following Specific Plan Exceptions of the Central City West Specific Plan:
  - a. To allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft.; as required by CCWSP, Section 6.F-2,

- b. To allow (0) zero-foot side yard setbacks for the east and west property lines for the North Building, in lieu of the 10 ft. required by CCWSP, Section 6.F-2,
  - c. To allow a (0) zero-foot rear yard setback for the seven-story North Building, in lieu of the 19 ft. (15 ft.+ 1 ft. above the 3rd floor) required by CCWSP, Section 6.F-2,
  - d. To allow a (0) zero-foot rear yard setback for the South Building in lieu of the 19 ft. (15 ft. above the 3rd floor of the 7 story building) required in the CCWSP, Section 6.F-6, and
  - e. To deviate from the street standards of 5<sup>th</sup> Street, as required by the CCWSP Appendix C.1.K to be consistent with the newly adopted Mobility Element.
3. Pursuant to LAMC Section 11.5.7.E a Specific Plan Project Permit Adjustment to average or reallocate the permitted density and floor area within the South Building portion of the site.
  4. Pursuant to LAMC Section 12.21.G a Director’s Decision to allow a 10% increase in the qualifying area of interior open space up to a maximum of 35%, in lieu of 25% of the total required usable open space.

Pursuant to various sections of the LAMC the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route, removal of existing street trees, building and tenant improvements. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

**ENVIRONMENTAL SETTING:**

The Project Site is bounded by 5<sup>th</sup> Street and multi-family residential development to the north, an office building and surface parking lot to the east along Bixel Street, the Bixel and Lucas Project along 6<sup>th</sup> Street to the south, and Lucas Avenue and office buildings to the west. On a regional level, the Project Site is located approximately 0.25 miles west of the Harbor/Pasadena Freeway (I-110/SR-110) and one mile south of the Hollywood Freeway (US-101). Locally, the Project Site is accessible via 5<sup>th</sup> Street, 6<sup>th</sup> Street, and Bixel Street. Access to the Project Site is also provided by an alley that runs parallel to 5<sup>th</sup> Street and 6<sup>th</sup> Street between Bixel Street and Lucas Avenue. The Project Site is within the Westlake Community Plan area and the CCWSP area. Within the Specific Plan area, the Project Site is located within the Crown Hill District within the Central Subarea. The Project Site consists of one zoning designation, CW, which refers to the zoning designations of the Central City West Specific Plan. According to the CCWSP, the northerly portion of the Project Site is zoned R5(CW)-U/6 and has a land use designation of High Density Residential; the two western parcels on the southerly portion of the Project Site are zoned C2(CW)-U/3 and have a land use designation of Community Commercial; and the remaining parcels on the southerly portion of the Project Site are zoned C4(CW)-U/4.5 and have a land use designation of Regional Center Commercial. The Project Site is currently improved with a partially occupied four-story commercial office and medical office building and a partially occupied five-story commercial office and medical office building that fronts both 6<sup>th</sup> Street and Bixel Street, and a three-story parking structure that fronts 5<sup>th</sup> Street. The existing buildings total approximately 129,892 square feet of floor area, and the parking structure contains approximately 59,492 square feet of building area.

<p><b>COMMUNITY PLAN AREA</b> Westlake Community Plan</p>	<p><b>AREA PLANNING COMMISSION/CNC</b> Central City</p>	<p><b>STATUS:</b>  <input type="checkbox"/> PRELIMINARY  <input type="checkbox"/> PROPOSED  <input checked="" type="checkbox"/> ADOPTED      date 09/16/1997</p>
<p><b>EXISTING ZONING</b> R5(CW)-U/6, C2(CW)-U/3, and C4(CW)-U/4.5</p>	<p><b>MAX. DENSITY ZONING</b> 4.7:1 FAR (363,227 sf / 77,332 sf)</p>	<p><input checked="" type="checkbox"/> DOES CONFORM TO PLAN  <input type="checkbox"/> DOES NOT CONFORM TO PLAN</p>
<p><b>PLANNED LAND USE &amp; ZONE</b> Land Uses: Regional Center Commercial, High Density Residential, Community Commercial Zone: R5(CW)-U/6, C2(CW)-U/3, and C4(CW)-U/4.5</p>	<p><b>MAX DENSITY PLAN</b> High Density Residential: 6:1 FAR, density limited to one dwelling unit/200 sf; Community Commercial: 3:1 FAR, density limited to one dwelling unit/400 sf; Regional Center Commercial: 4.5:1 FAR, density limited to one dwelling unit/200 sf of lot</p>	
<p><b>SURROUNDING LAND USES</b> Multi-Family Residential, Retail, Commercial, Educational, and Medical</p>	<p><b>PROJECT DENSITY</b> 4.51:1 (across entire Project Site)</p>	

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

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

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

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- 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 to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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- 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.

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



SIGNATURE

city planning Associate

TITLE

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- 3) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.



**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

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

**BACKGROUND**

<b>PROPONENT NAME</b> Sapphire Equity, LLC.	<b>PHONE NUMBER</b> (213) 745-5191
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<b>PROPONENT ADDRESS</b> 888 S. Figueroa Street, Suite 1900, Los Angeles, CA 90017
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<b>AGENCY REQUIRING CHECKLIST</b> Los Angeles Department of City Planning	<b>DATE SUBMITTED</b> March 10, 2016
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**ENVIRONMENTAL IMPACTS**

(A brief explanation of all answers is required except “No Impact” answers that are adequately supported by the information sources cited.)

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

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

**III. AIR QUALITY.** Where applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

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

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

a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected				

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**VII. GREENHOUSE GAS EMISSIONS**

Would the project:

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

**VIII. HAZARDS AND HAZARDOUS MATERIALS**

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**IX. HYDROLOGY AND WATER QUALITY.** Would the proposal result in:

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

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

**X. LAND USE AND PLANNING.** Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XI. MINERAL RESOURCES.** Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XII. NOISE.** Would the project result in:

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

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

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

	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XIV. PUBLIC SERVICES.**

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

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

**XV. RECREATION.**

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

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

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

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

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

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

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------	--------------------------

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

	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	-------------------------------------	--------------------------	--------------------------	--------------------------

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

	<b>Potentially Significant Impact</b>	<b>Potentially Significant Unless Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
results in substantial safety risks?				
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**XVII. UTILITIES.** Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Potentially Significant Impact**    
 **Potentially Significant Unless Mitigation Incorporated**    
 **Less Than Significant Impact**    
 **No Impact**

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

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

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

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

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

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

PREPARED BY	TITLE	TELEPHONE #	DATE
Christina T. Lee	City Planning Associate	(213) 473-9723	March 10, 2016

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## **ATTACHMENT A. PROJECT DESCRIPTION**

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### **1. INTRODUCTION**

The purpose of this section is to describe the characteristics of the Sapphire Project (“Proposed Project”). As discussed below, the Proposed Project would involve the construction and operation of a new mixed-use development within an existing 1.92-acre site that is currently developed with two commercial office and medical office buildings and a multi-level parking structure.

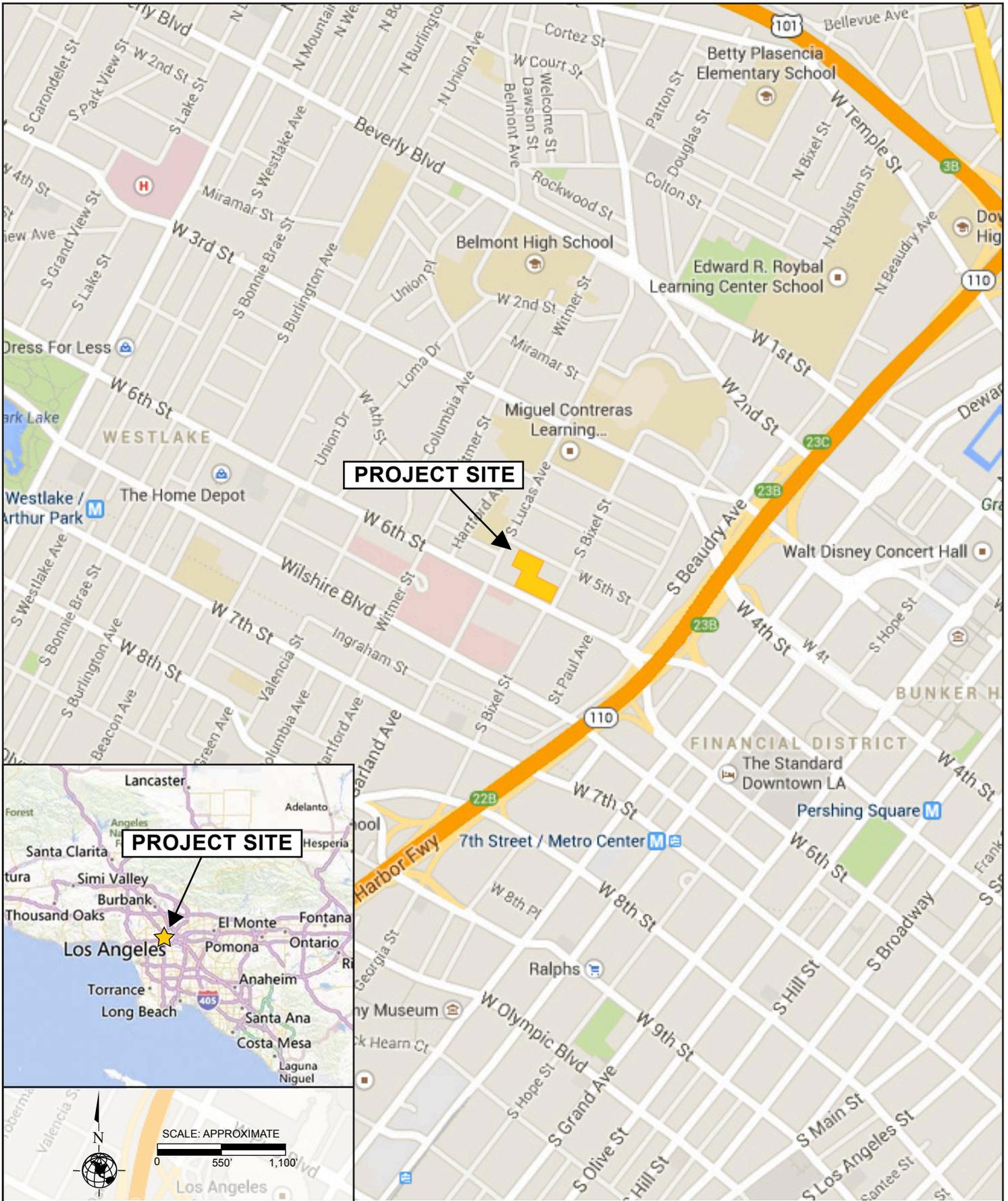
### **2. PROJECT LOCATION**

The Project Site is located within the boundaries of the Westlake Community Plan area within the City of Los Angeles. The Project Site is located west of the Harbor (I-110) Freeway and west of Downtown Los Angeles. Figure 1, Project Location Map, shows the location of the Project Site in relation to the greater Los Angeles area.

Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101) and the Harbor/Pasadena Freeway (I-110/SR-110). The Hollywood Freeway runs in a north-south direction north of the Project Site, while the Harbor/Pasadena Freeway runs in a north-south direction east of the Project Site. These two freeways also provide access to the San Bernardino (I-10) and Santa Ana (I-5) freeways to the east, to the Golden State Freeway (I-5) to the north, and to the Santa Monica (I-10) and Pomona (SR-60) freeways to the south.

The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (“Metro”), LADOT DASH, Montebello Bus Lines, and Orange County Transportation Authority (“OCTA”). The Project Site’s proximity to the 7<sup>th</sup> Street/Metro Center Station, approximately one-half mile to the southeast, provides transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators.

Local street access is provided by the grid roadway system surrounding the Project Site and surrounding area. W. 5<sup>th</sup> Street, which borders the Project Site to the north, is a two-way east-westbound street providing one travel lane in each direction. 5<sup>th</sup> Street is classified as a Collector Street. S. Bixel Street, which borders the Project Site to the east, is a two-way north-southbound street providing one travel lane in each direction. Bixel Street is classified as a Modified Avenue II roadway. 6<sup>th</sup> Street, located south of the Project Site, is a two-way east-westbound street providing two travel lanes in each direction. 6<sup>th</sup> Street is classified as an Avenue II roadway. Lucas Avenue, located west of the Project Site, is a two-way north-southbound street that provides one travel lane in each direction. Lucas Street is classified as an Avenue II roadway.



Source: Google Base Map, Street View, 2014.



Figure 1  
Project Location Map

### 3. ENVIRONMENTAL SETTING

#### A. Zoning and Land Use Designation

The Project Site is located within the Westlake community within the City of Los Angeles. The Project Site is further located within the Central City West Specific Plan area. As such, the City of Los Angeles Municipal Code, the City of Los Angeles General Plan, the Westlake Community Plan, and the Central City West Specific Plan guide development on the Project Site and in the Project Site area. A description of each document is provided below.

##### (1) City of Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) assists City offices, departments and other governmental agencies in their functions, and will serve the people as the official source of information regarding the regulations enacted by the City of Los Angeles for the preservation of the public peace, health and safety. As the LAMC pertains to development, the LAMC sets specific requirements and standards for development projects within the City of Los Angeles, such as zoning laws, construction standards, open space and parking requirements. The LAMC is amended by ordinances and is enforced by the City of Los Angeles.

##### (2) City of Los Angeles General Plan

Whereas the LAMC is an overarching document that provides specific requirements and standards for all aspects of living, working, and city function (including development) within the City of Los Angeles, the City of Los Angeles General Plan (General Plan) is a comprehensive, long-range declaration of purposes, policies, and programs to guide future development and growth within the City. The General Plan is a dynamic document consisting of 11 elements, 10 Citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Mobility Element) and the Land Use Element (which provides individual plans for each of the City's 35 Community Planning Areas), and the Plan for a Healthier Los Angeles (adopted in 2014).<sup>1</sup>

##### (3) Westlake Community Plan

As described above, the City of Los Angeles Land Use Element is divided into 35 community plans. The Project Site is located in the Westlake Community Plan area (CPA) within the City of Los Angeles. The Westlake Community Plan aims to promote “a vision of the Westlake area as a community that looks at its past with pride and approaches its future with eagerness, while maintaining its individual identity.” To achieve this vision, the Community Plan aims to preserve and enhance the positive characteristics and promote community identity of the existing residential neighborhoods, while providing a variety of new housing opportunities; improve the function, design, and vitality of commercial corridors and plan future commercial and industrial development that promotes

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<sup>1</sup> *City of Los Angeles Department of City Planning, General Plan Structure: Summary of General Plan Elements, Spring 2014.*

needed job opportunities; and maximize the development of future transit systems. The Project Site is also located in an Enterprise Zone (ZI No. 2374) that regulates parking standards and height, and is within the jurisdiction of the Freeway Adjacent Advisory Notice for Sensitive Uses (ZI No. 2427).

#### **(4) Central City West Specific Plan**

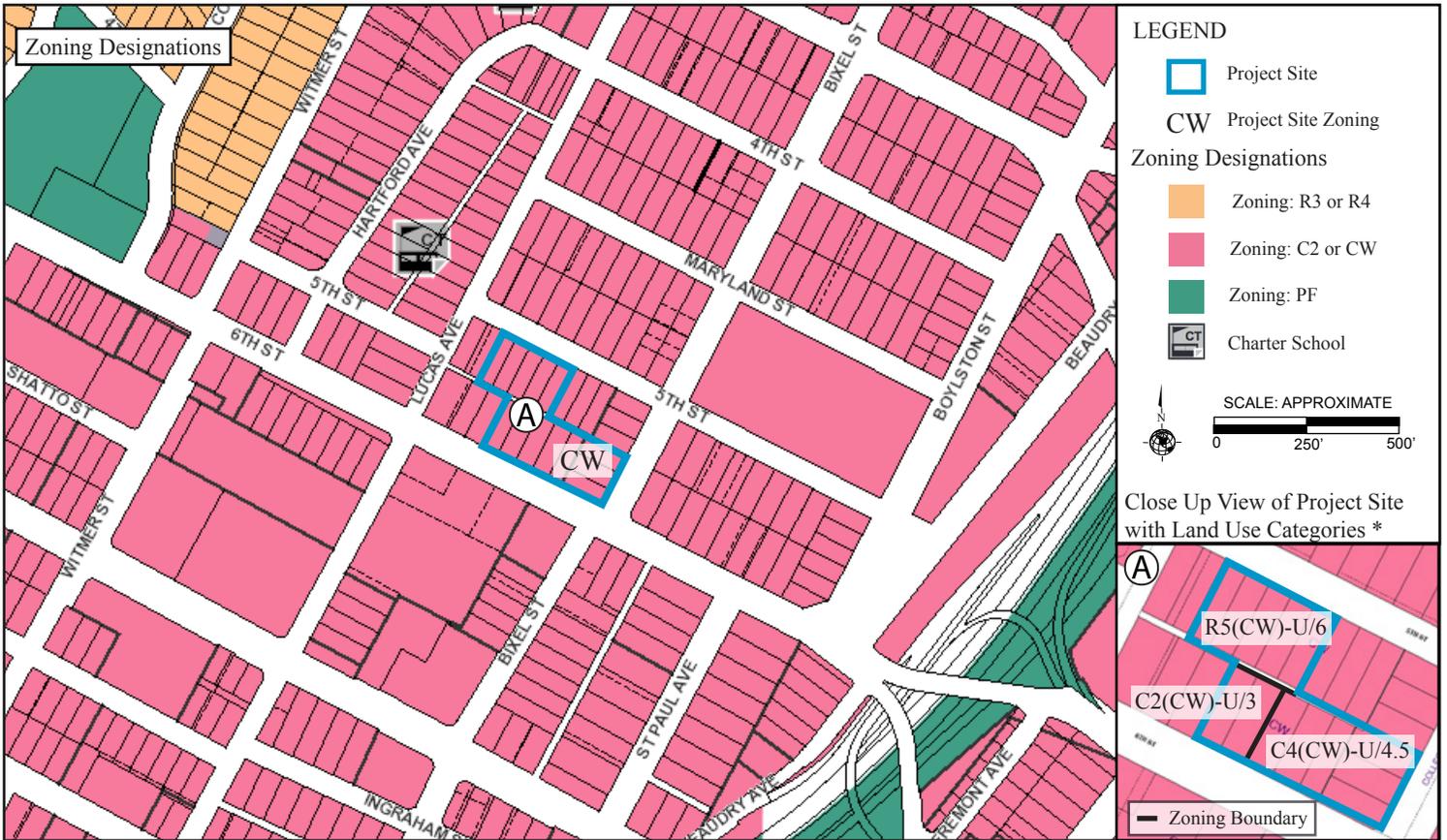
As seen in Figure 2, Zoning and General Plan Designations, the Project Site is zoned “CW,” which refers to the zoning designations of the Central City West Specific Plan (“Specific Plan”). The Project Site is also located within the Central City West Specific Plan area. The Central City West Specific Plan guides development on the Project Site. The Specific Plan provides specific guidelines and requirements for development that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Central City West Specific area. The Specific Plan area is divided into three subareas: the North Subarea, Central Subarea (includes the Witmer/Lucas District, the 1<sup>st</sup>/2<sup>nd</sup> Street District, and the Crown Hill District), and South Subarea (includes the Wilshire Corridor District and the 8<sup>th</sup>/9<sup>th</sup> Street District). The Project Site is located within the Crown Hill District in the Central Subarea.

According to the Central City West Specific Plan, the northern portion of the Project Site is zoned R5(CW)-U/6 and has a land use designation of High Density Residential; the two western parcels on the southern portion of the Project Site is zoned C2(CW)-U/3 and have a land use designation of Community Commercial; and the remaining parcels on the southern portion of the Project Site are zoned C4(CW)-U/4.5 and have a land use designation of Regional Center Commercial. The corresponding zone for High Density Residential is R5 Zone. The corresponding zones for Regional Center Commercial are C4, C2, RAS3, RAS4, P, and PB Zones. The corresponding zones for Community Commercial are the C4, C2, C1, CR, RAS3, RAS4, P, and PB Zones.

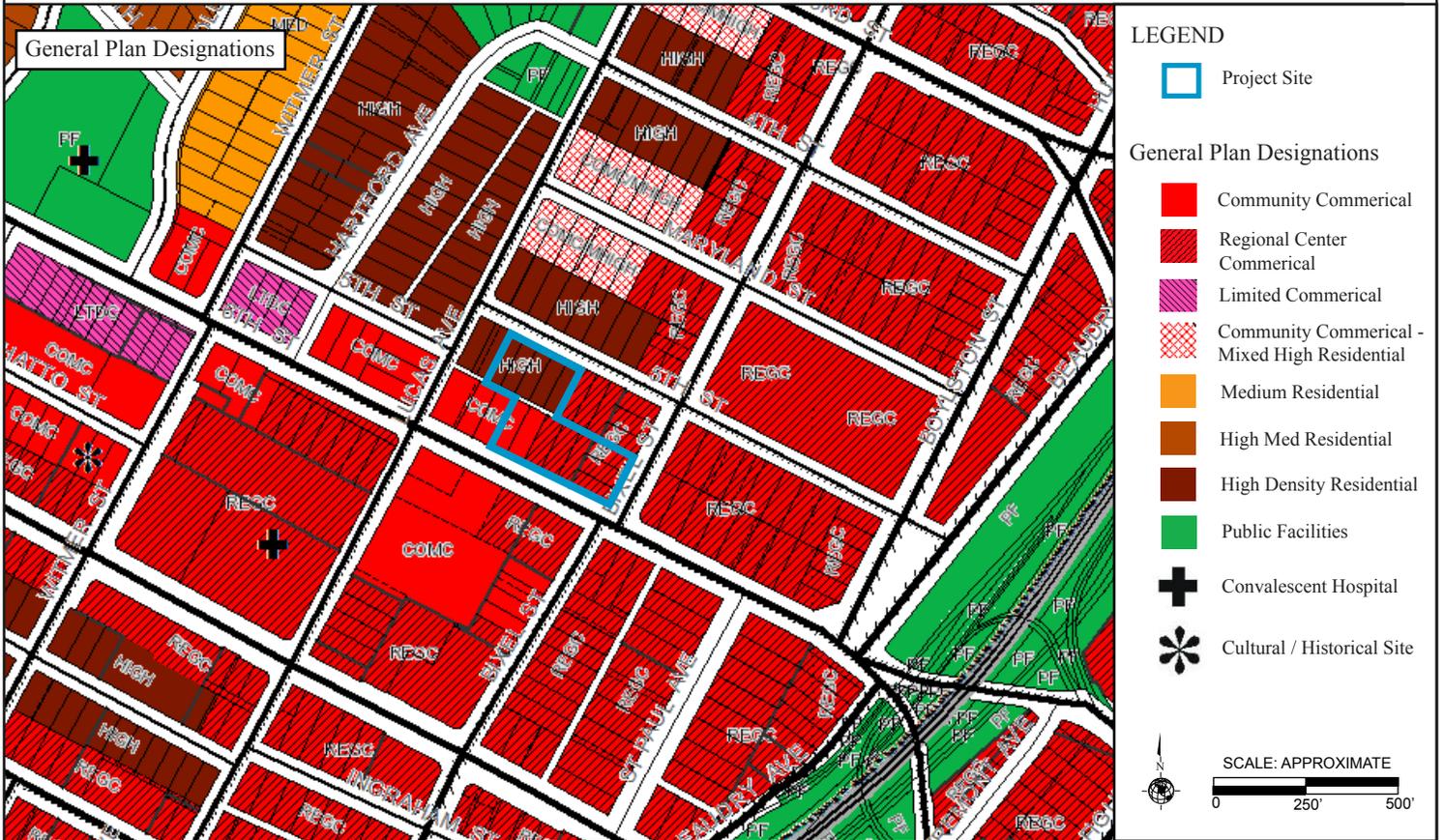
### **B. Existing Conditions**

#### **(1) Project Site**

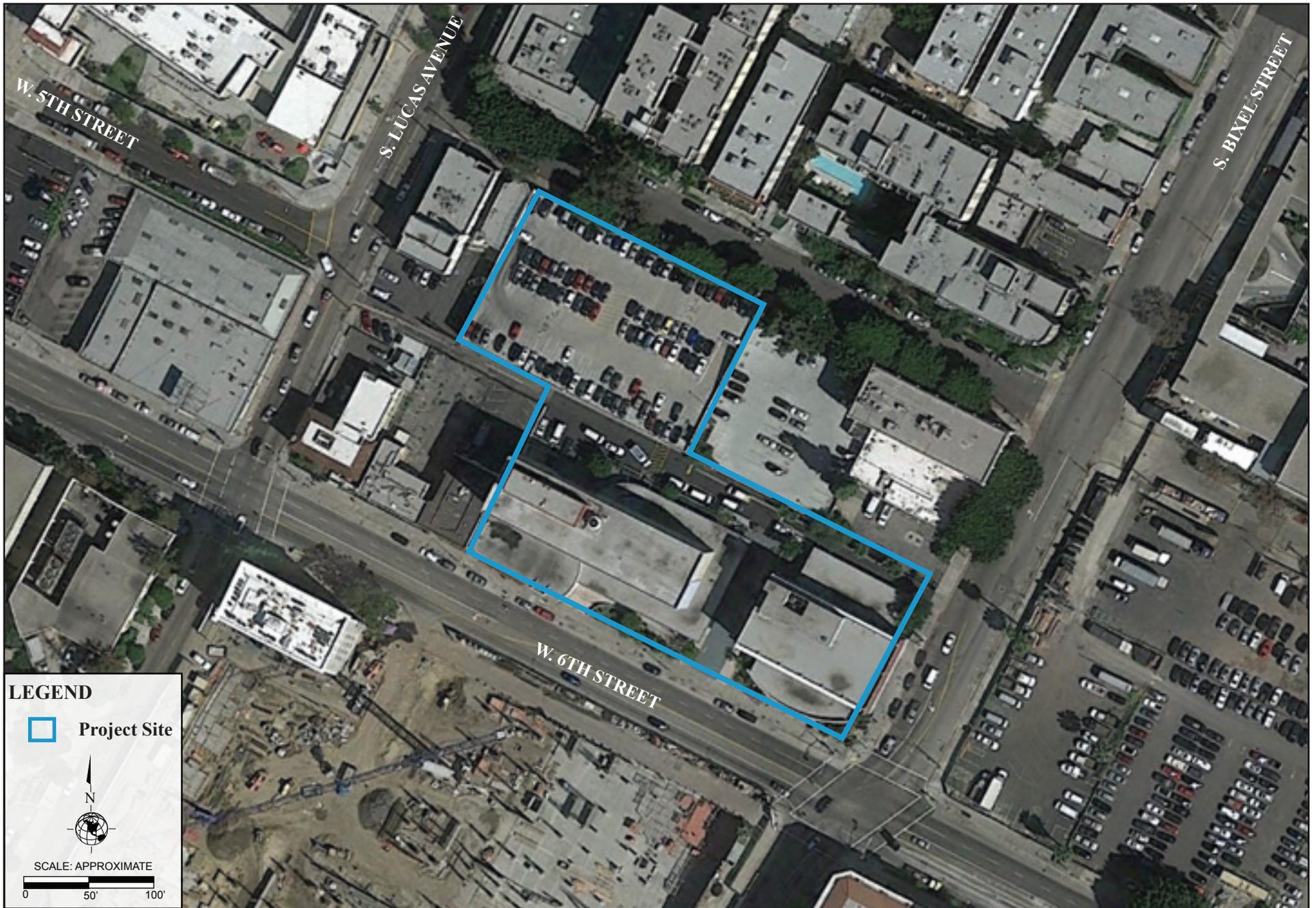
The Project Site is situated on thirteen parcels that have the following Assessor Parcel Numbers (APNs): 5152001021, 5152001014, and 5152001023. The Project Site contains approximately 83,659 gross square feet (1.92-acre). The Project Site includes two sides: the northern portion of the Project Site, which includes five parcels fronting 5<sup>th</sup> Street, and the southern portion of the Project Site, which includes five parcels fronting 6<sup>th</sup> Street and three parcels fronting Bixel Street. The elevation across the Project Site increases from south to north and west to east. The southern portion of the Project Site is approximately 361 feet above mean sea level and the northern portion of the Project Site is approximately 376 feet above mean sea level. The Project Site is currently developed with one three-level parking structure that fronts W. 5<sup>th</sup> Street and one four-story commercial office and medical building and one five-story commercial office and medical office building that fronts W. 6<sup>th</sup> Street. The building floor area of both buildings totals approximately 97,242 square feet, which includes 27,204 square feet of office space, 58,112 square feet of medical/dental office space, a 996 square foot high-turnover restaurant, and the remaining 10,930 square feet is currently vacant. An aerial photograph depicting the Project Site and the immediately surrounding land uses is provided in Figure 3, Aerial Photograph of the Project Site and Surrounding Land Uses. Photographs depicting the current conditions of the Project Site and surrounding land uses are provided in Figure 4, Photographs of the Project Site, and Figure 5, Photographs of the Surrounding Land Uses, respectively.



\* Land Use Categories are identified in the Central City West Specific Plan.



Source: City of Los Angeles, Department of City Planning, ZIMAS, 2015.



Source: Google Earth, March 2015.



Figure 3  
Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: From the south side of W. 6th Street, looking east at the Project Site.



View 2: From the southwest corner of W. 6th Street and Bixel Street, looking north at the Project Site.



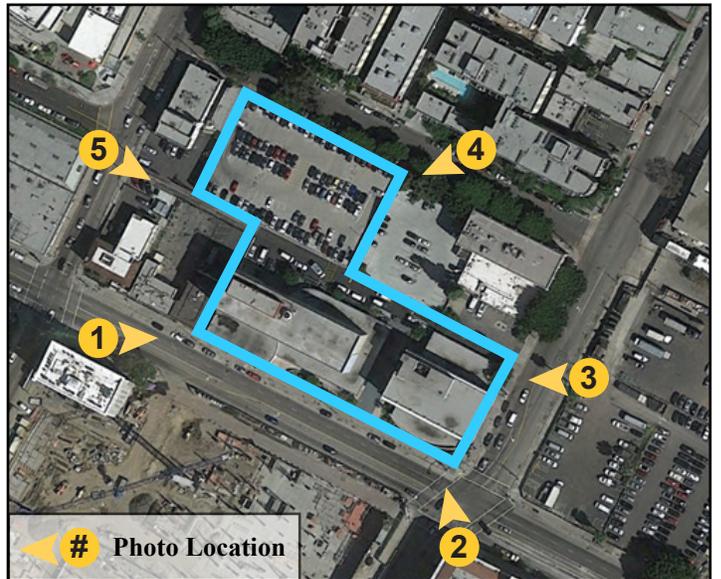
View 3: From the east side of Bixel Street, looking west at the Project Site.



View 4: From the north side of W. 5th Street, looking southwest at the Project Site.



View 5: From the west side of Lucas Avenue, looking southwest towards the Project Site.



Sources: Parker Environmental Consultants, January 2016.



View 6: From the southwest corner of the W. 6th Street and Lucas Avenue intersection, looking east at the properties to the west of the Project Site.



View 7: From the northwest corner of W. 6th Street and Lucas Avenue, looking southeast at the properties to the south of the Project Site.



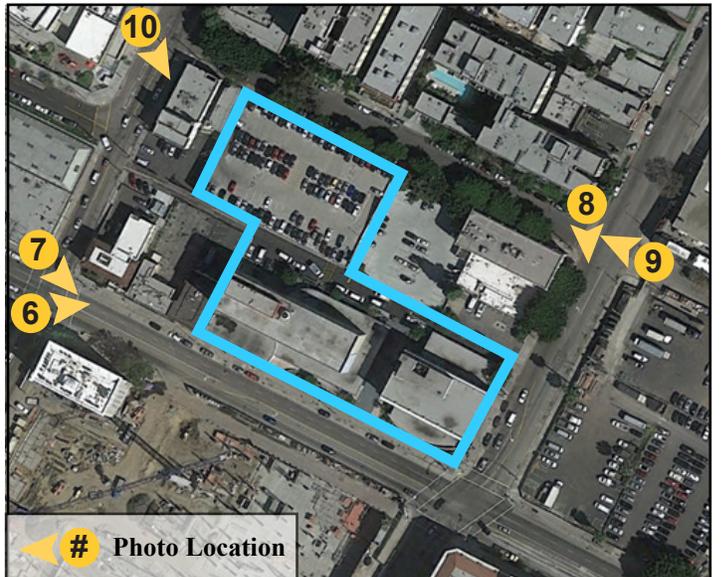
View 8: From the northwest corner of W. 5th Street and Bixel Street, looking south at the properties to the east of the Project Site.



View 9: From the east side of Bixel Street, looking northwest along W. 5th Street and at the properties north of the Project Site.



View 10: From the west side of Lucas Avenue, looking southwest at the property to the west of the Project Site.



Sources: Parker Environmental Consultants, January 2016.



Figure 5  
Photographs of Surrounding Land Uses  
Views 6-10

## (2) Surrounding Properties

As shown in Figure 3, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site is surrounded by a diverse urban area comprised of commercial, medical, institutional, residential, office, school, production studio, and retail land uses. The larger of these uses include the Good Samaritan Hospital located directly southwest of the Project Site, the Los Angeles Center Studios located to the northeast, and the Para Los Niños Evelyn Thurman Gratts Primary School located to the west. Directly northwest of the Project site is a large concentration of multi-family residential land uses, while further north are single-family residential areas.

The properties surrounding the Project Site include commercial/retail, office, multi-family residential buildings, schools, the Good Samaritan Hospital, and the Bixel and Lucas Project construction site. When complete, the Bixel and Lucas Project will add approximately 648 dwelling units and 40,000 square feet of ground-floor commercial space.<sup>2</sup> Refer to Figure 3, Surrounding Land Use Map for an aerial view of the Project Site and immediately surrounding land uses. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 5, Photographs of Surrounding Uses.

A description of the land uses surrounding the Project Site to the north, east, south and west is provided below:

North: 5<sup>th</sup> Street immediately borders the northern portion of the Project Site to the north. Multi-family residential buildings and an office building front the north side of 5<sup>th</sup> Street. An office building borders the northeast edge of the Project Site on the southwest corner of Bixel Street and 5<sup>th</sup> Street. Refer to Figure 5, View 9. The land uses that front the north side of 5<sup>th</sup> Street are designated as Regional Center Commercial and High Density Residential.

East: Bixel Street immediately borders the southern portion of the Project Site to the east. A surface parking lot lies to the east of Bixel Street and the Project Site. Refer to Figure 5, View 8. An office building, located on the southwest corner of 5<sup>th</sup> Street and Bixel Street, the Los Angeles Center Studios and a multi-family apartment building (along 5<sup>th</sup> Street) are located to the northeast of the Project Site. Refer to Figure 5, View 9. A multi-family apartment building (the Piero Apartment building) is located southeast of the Project Site. The lands uses to the east are designated as Regional Center Commercial.

South: 6<sup>th</sup> Street immediately borders the southern portion of the Project Site to the south. The Bixel and Lucas Project Site, currently under construction, borders the south side of 6<sup>th</sup> Street. The Bixel and Lucas Project will consist of 648 dwelling units and approximately 40,000 square feet of ground floor commercial space.<sup>3</sup> One office building remains on the construction site and is being converted to apartments. The building is located on the northwest corner of the construction site. Refer to Figure 5, View 7. The land uses to the south of the Project Site are designated as Community Commercial and Regional Center Commercial.

West: Commercial land uses along W. 6<sup>th</sup> Street and Para Los Niños building border the Project Site to the west. Refer to Figure 5, View 6 and View 10. Lucas Avenue is located to the west of the Project Site. On the west side of Lucas Avenue, the Para Los Niños – Evelyn Thurman Gratts Primary School and the Good Samaritan Hospital

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<sup>2</sup> *City of Los Angeles Department of City Planning, Bixel and Lucas Project DEIR, April 2007.*

<sup>3</sup> *Ibid.*

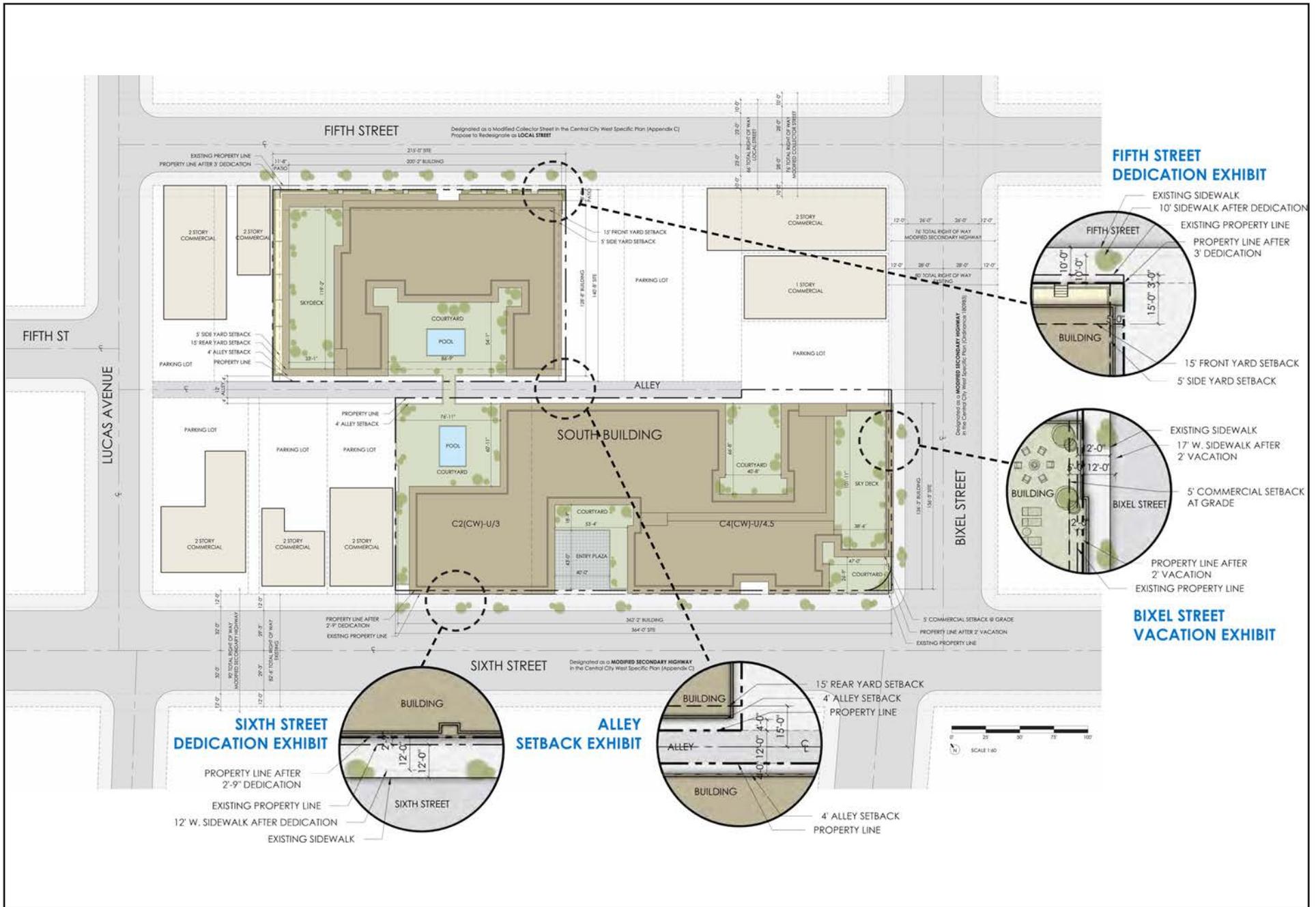
complex are located to the northwest and southwest of the Project Site, respectively. The land uses to the west are designated as Regional Center Commercial, Community Commercial, and High Density Residential.

**4. PROJECT CHARACTERISTICS**

The Proposed Project includes the demolition of the existing structures on-site (a multi-level parking garage, one four-story commercial office and medical office building, and one five-story commercial office and medical office building) and the construction of two buildings (North Building and South Building) with a total of 369 residential units and 22,000 square feet of ground floor retail use. The North Building would include 142 residential units. The South Building would include 227 residential units and 22,000 square feet of ground floor retail, which may include retail, restaurant, and coffee shop uses. The two buildings would be connected by a footbridge that spans above the adjacent alleyway. A summary of the Proposed Project with the proposed unit mix and floor area for Project is provided in Table 1, Proposed Development Program, below. The Illustrative Site Plan is shown in Figure 6.

**Table 1  
Proposed Development Program**

<b>Land Uses</b>	<b>Dwelling Units</b>	<b>Floor Area (Square Feet)</b>
<b>North Building</b>		
<b>Residential</b>		
Studio Units	56	32,872 sf
1-Bedroom Units	45	34,155 sf
2-Bedroom Units	30	34,770 sf
3-Bedroom Units	11	13,695 sf
<i>North Building Residential Subtotal</i>	<i>142 du</i>	<i>115,492 sf</i>
<b>South Building</b>		
<b>Residential</b>		
Studio Units	137	80,419 sf
1-Bedroom Units	51	38,709 sf
2-Bedroom Units	26	30,134 sf
3-Bedroom Units	13	16,185 sf
<i>South Building Residential Subtotal</i>	<i>227 du</i>	<i>165,447 sf</i>
<b>Commercial</b>		
Retail	--	22,000 sf
<b>TOTAL</b>	<b>369 du</b>	<b>302,939 sf</b>
<i>Notes:</i> <i>du = dwelling unit; sf = square feet</i> <i>Source: Steinberg Architects, December 29, 2015.</i>		



Source: Steinberg Architects, January 6, 2016.

Both buildings would include seven stories above grade and two levels of subterranean parking. The elevation across the Project Site increases from south to north and west to east. The southern portion of the Project Site is approximately 361 feet above mean sea level and the northern portion of the Project Site is approximately 376 feet above mean sea level. Because of the elevation increase across the Site, the South Building appears lower than the North Building (refer to Figures 7 through 9 for building cross sections and Figures 10 through 12 for illustrative building elevations).

#### **A. Residential Uses**

The Project includes 369 residential units within two buildings (North Building and South Building). The North Building would include a total of 142 residential units, comprised of 56 studio units, 45 one-bedroom units, 30 two-bedroom units, and 11 three-bedroom units. The South Building would include 137 studio units, 51 one-bedroom units, 26 two-bedroom units, and 13 three-bedroom units. In total, the Project would include 193 studio units, 96 one-bedroom units, 56 two-bedroom units, and 24 three-bedroom units; of varying sizes and configurations.

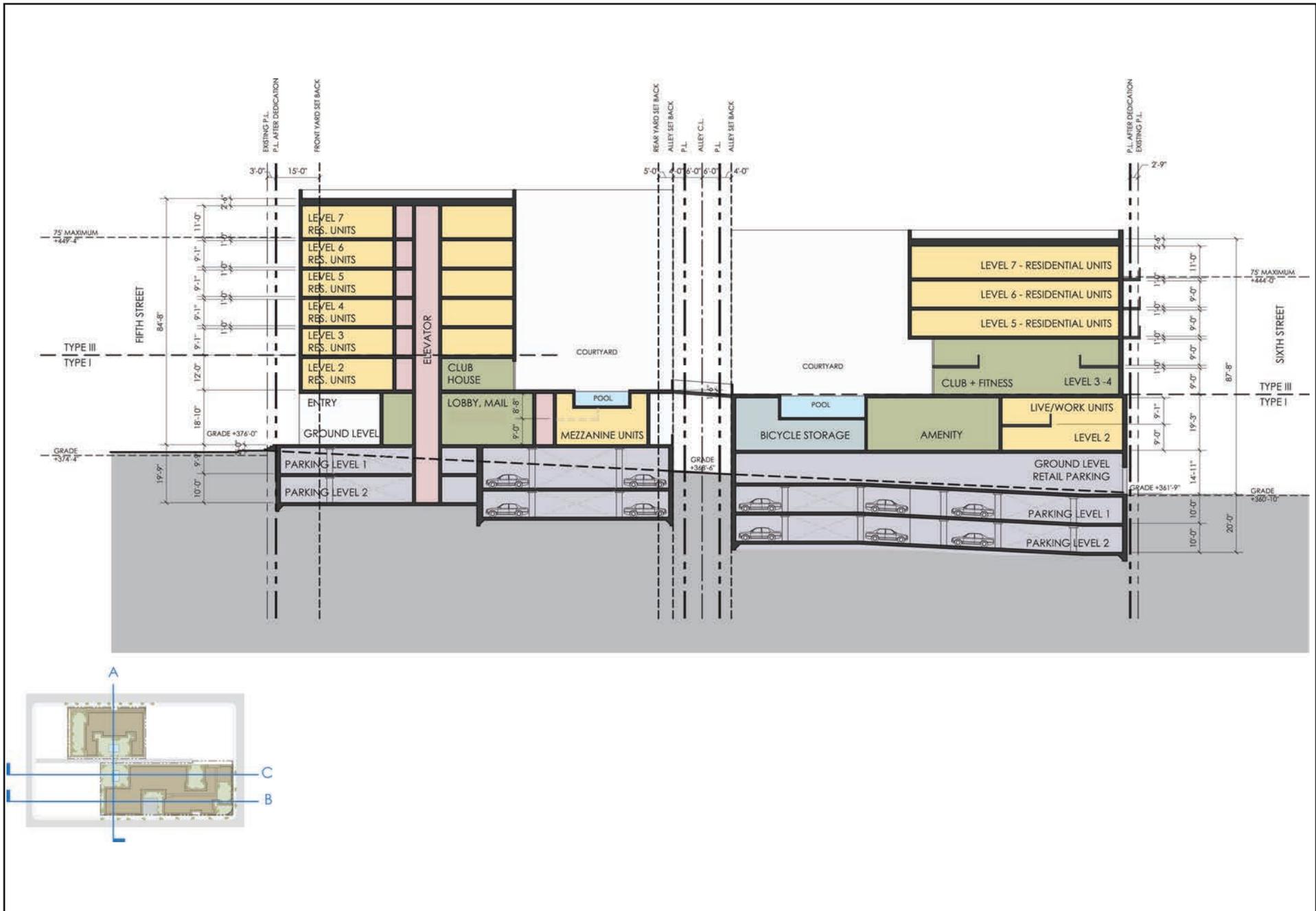
The proposed residential buildings would include residential lobbies, mailroom, residential amenities, and a leasing office. Residential amenities may include but are not limited to: swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station.

#### **B. Commercial Uses**

The Proposed Project includes approximately 22,000 square feet of ground floor neighborhood-serving retail space. The commercial uses would be located on the ground floor of the South Building, fronting both 6<sup>th</sup> Street and Bixel Street. The proposed commercial uses may include of 18,600 square feet of general retail space, a 2,200 square foot quality restaurant, and a 1,200 square-foot café/coffee shop.

#### **C. Floor Area**

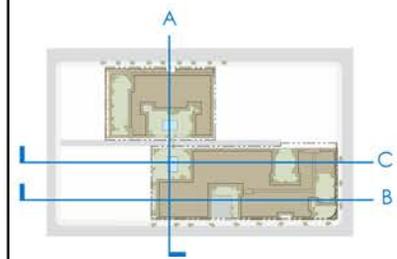
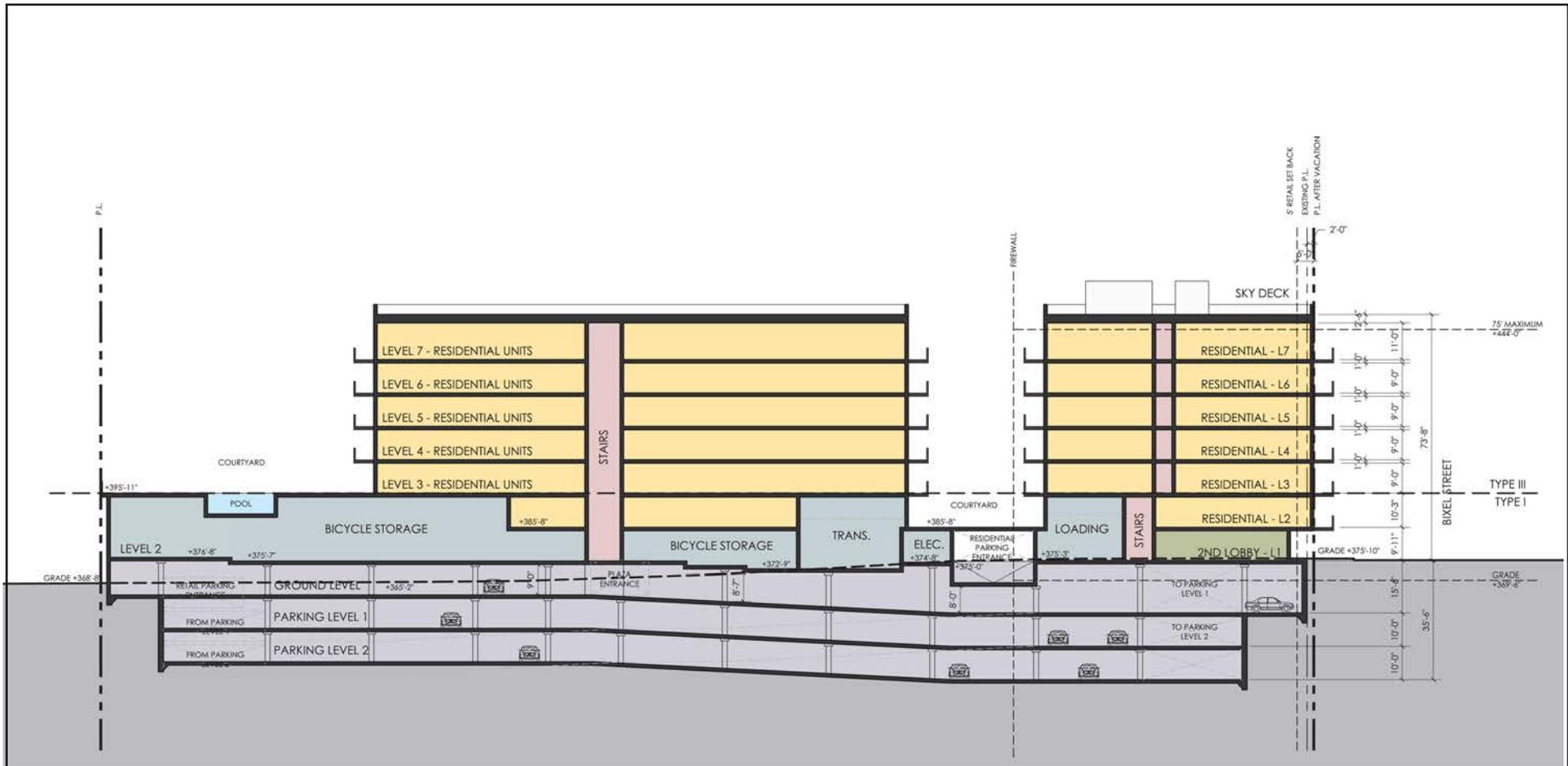
The Project Site's gross lot area is approximately 83,659 square feet. As discussed above and shown in Figure 2, the Project Site is zoned CW, which signifies that development on-site is defined by land use categories determined by the Central City West Specific Plan. The northern portion of the Project Site has a land use category of R5(CW)-U/6 and has a land use designation of High Density Residential; the two western parcels on the southern portion of the Project Site have a land use category of C2(CW)-U/3 and have a land use designation of Community Commercial; and the remaining parcels on the southern portion of the Project Site have a land use category of C4(CW)-U/4.5 and have a land use designation of Regional Center Commercial. Allowable Floor Area Ratio (FAR) in the R5 designation is 6:1; C2 designation is 3:1; and C4 designation is 4.5:1. Total allowable FAR for the Site is 4.70:1, which allows up to 363,227.7 square feet of development. The Project proposes a 348,430.5 square feet of floor area (4.51:1 FAR), which is within the allowable FAR.



Source: Steinberg Architects, January 6, 2016.

Figure 7  
Building Cross Section A





Source: Steinberg Architects, January 6, 2016.



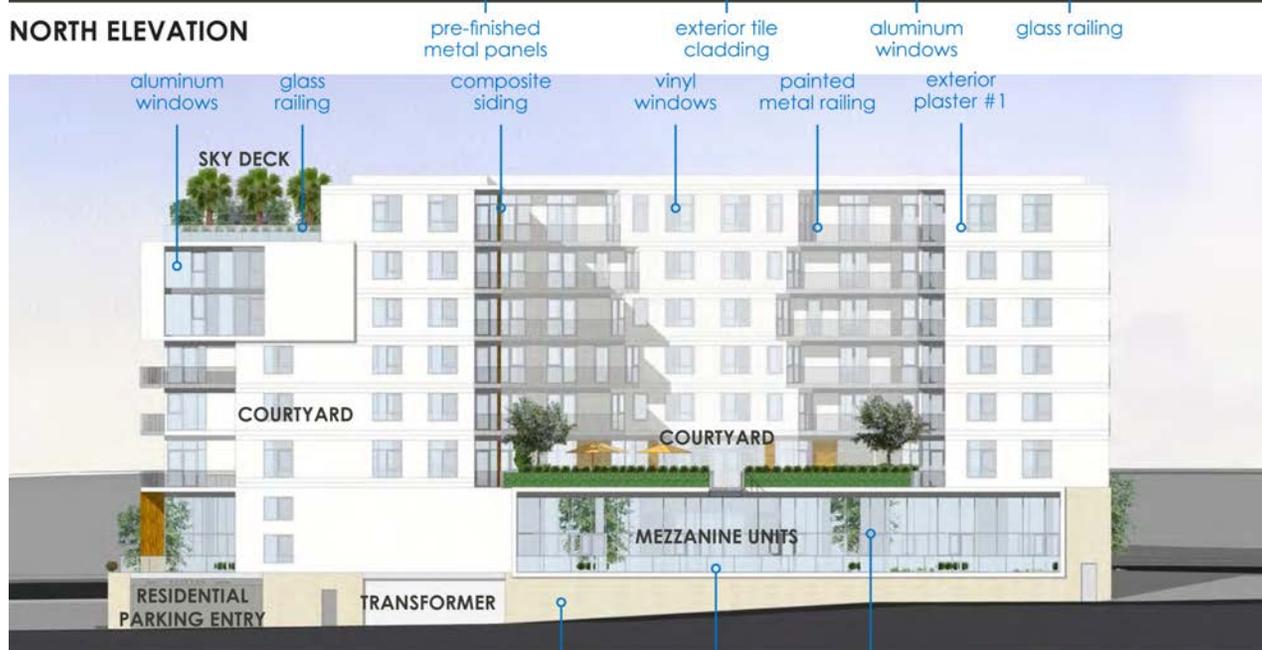
Source: Steinberg Architects, January 6, 2016.



Source: Steinberg Architects, January 6, 2016.



**NORTH ELEVATION**



**SOUTH ELEVATION**

Source: Steinberg Architects, January 6, 2016.



At the intersection of 6th Street and Bixel Street, looking northwest at the South Building.



On 6th Street, looking north at the South Building.

Source: Steinberg Architects, January 6, 2016.

**Table 2  
Summary of Allowable and Proposed Floor Area**

<b>Zone</b>	<b>Allowable FAR</b>	<b>Proposed FAR</b>	<b>Allowable Floor Area (sf)</b>	<b>Proposed Floor Area (sf)</b>
C4 (Regional)	4.50	4.4	172,705.5	168,812.2
C2 (Commercial)	3.0	3.27	43,200.0	47,068.2
<b>C2+C4 Subtotal</b>	<b>4.09</b>	<b>4.09</b>	<b>215,905.5</b>	<b>215,880.4</b>
<b>R5</b>	<b>6.0</b>	<b>5.40</b>	<b>147,322.2</b>	<b>132,550.1</b>
<b>TOTAL</b>	<b>4.7</b>	<b>4.51</b>	<b>363,227.7</b>	<b>348,430.5</b>

*Source: Steinberg Architects, January 6, 2016.*

**D. Building Height**

The Specific Plan guides development on the Project Site. For the Project Site, the Specific Plan specifies that buildings or structures shall not exceed a maximum height of 1,218 feet above mean sea level (MSL).<sup>4</sup> The Project Site was found to be between 361 feet above MSL in the southern portion and 376 feet above MSL in the northern portion of the Project Site. The proposed buildings would be a total of seven stories above grade, reaching approximately 90 feet above grade. The proposed building heights would result in a maximum of approximately 466 feet above MSL. The South Building would appear to be lower than the North Building due to the elevation change across the Project Site. The Project would contain approximately two levels of subterranean parking. The North Building would include seven levels of residential. The South Building would include ground floor commercial space with six levels of residential atop the commercial space. Renderings of the buildings’ cross sections are depicted in Figure 7 through Figure 9.

**E. Architectural Features**

Architectural features would include a mix of materials and architectural elements, which may include but is not limited to: aluminum windows, pre-finished metal panels, painted metal railing, glass railing, vinyl window, exterior plaster, and composite siding. Building elevations depicting the scale and massing of the proposed structure are shown in Figure 10, Building Elevations (East - West), Figure 11, North and South Building Elevations –South Building, and Figure 12, North and South Building Elevations – North Building. Illustrative renderings depicting the completed Project within the existing community context are depicted in Figure 12.

**F. Open Space and Landscaping**

Open space courtyards and landscaping features are proposed throughout the Project. Amenities proposed within the common open space areas include swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor

<sup>4</sup> City of Los Angeles Department of City Planning, Central City West Specific Plan, Section 8, amended September 2000.

kitchen, and dog wash station. The Proposed Project’s landscape palate would feature ornamental plants and drought-tolerant species. The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 3, Summary of Required and Proposed Open Space Areas, below. As shown in Table 3, the Proposed Project would include 16,075 square feet of open space within the North Building and 24,600 square feet of open space in the South Building for a total of 40,675 square feet of open space on-site. Existing street trees adjacent to the Project Site along 5th Street would be removed and replaced in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Board of Public Works.

**Table 3  
Summary of Required and Proposed Open Space Areas**

LAMC Open Space Requirements <sup>a</sup>	Dwelling Units		Open Space Required (square feet)	
	North Building	South Building	North Building	South Building
Less than three habitable rooms (100 sf/du)	95	177	9,500	17,700
Three habitable rooms (125 sf/du)	33	37	4,125	4,625
More than three habitable rooms (175 sf/du)	14	13	2,450	2,275
<b>Total Required</b>	<b>142</b>	<b>227</b>	<b>16,075</b>	<b>24,600</b>
Proposed Open Space			Open Space Proposed (square feet)	
Common Open Space	--	--	14,225	23,150
Private Open Space <sup>b</sup>	--	--	1,850	1,450
<b>Total Proposed</b>	<b>142</b>	<b>227</b>	<b>16,075</b>	<b>24,600</b>
<i>Notes:</i> <sup>a</sup> LAMC 12.21.G and Central City West Specific Plan <sup>b</sup> Per the Central City West Specific Plan, 50 sf/unit may be counted towards required open space if 150 sf/unit is provided on at least 50% of units. Source: Steinberg Architects, January 6, 2016.				

**G. Parking and Access**

Parking for the Proposed Project would be provided within both buildings. Parking within the South Building is provided within two levels of subterranean parking and partially at-grade; parking within the North Building is provided in one level of subterranean parking and one level partially at-grade. Vehicular access to the South Building would be provided via one ingress/egress driveway on 6th Street and one ingress/egress driveway on the adjacent alleyway. Vehicular access to the North Building would be provided via one ingress/egress driveway on the alleyway. On-site parking would serve both residential and retail uses. Retail parking would be provided in the South Building and accessed through the 6<sup>th</sup> Street vehicular driveway. Residential parking for both buildings would be accessed through the driveways along the alleyway.

As summarized in Table 4, and discussed in further detail below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC. The Proposed Project would require and provide a total of 390 parking spaces with 355 residential spaces and 35 retail spaces. Pursuant to LAMC 12.21.A.4, the Proposed

Project seeks a 10 percent reduction in the number of residential stalls required, and a 20 percent reduction in the number of commercial stalls required.

The Proposed Project would provide 380 long-term and 49 short-term term bicycle parking spaces for the residential units and commercial space. The proposed bicycle parking and the reduction of automobile parking spaces are based upon the provisions of Ordinance 182,386 (effective March 13, 2013).

**Table 4  
Summary of Required and Proposed Parking Spaces**

Description	Quantity	Parking Required by Code <sup>a</sup>		Parking Provided
		Rate	Spaces	
<b>North Building</b>				
<i>Residential</i>				
Less than three habitable rooms	48	1.00 stall/du	48	--
Three habitable rooms	47	1.00 stall/du	47	--
More than three habitable rooms	47	1.25 stall/du	59	--
			<i>10% Reduction <sup>b</sup></i>	--
			<b>Subtotal Residential</b>	<b>139</b>
<b>South Building</b>				
<i>Residential</i>				
Less than three habitable rooms	131	1.00 stall/du	131	--
Three habitable rooms	46	1.00 stall/du	46	--
More than three habitable rooms	50	1.25 stall/du	63	--
			<i>10% Reduction <sup>b</sup></i>	--
			<b>Subtotal Residential</b>	<b>216</b>
<i>Commercial</i>				
Retail	22,000 sf	2 stalls / 1,000 sf	44	44
			<i>20% Reduction <sup>b</sup></i>	--
			<b>Subtotal Retail</b>	<b>35</b>
			<b>TOTAL</b>	<b>390</b>
<i>Notes:</i> du = dwelling unit, sf = square feet <sup>a</sup> LAMC 12.21.A.4(p) <sup>b</sup> Bicycle Parking Ordinance (No. 182,386), March 13, 2013. Source: Steinberg Architects, January 2016.				

**5. DESCRETIONARY ACTIONS**

**A. Lead Agency**

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the “Lead Agency” (State CEQA Guidelines Section 15367). For purposes of the Sapphire Project, the City of Los Angeles is the primary governmental agency responsible for approving the Proposed Project. As such, the EIR must be certified and the Proposed Project must be approved by the City of Los Angeles Department of City Planning before the Proposed Project can commence. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

## **B. Responsible Agencies**

Public agencies other than the Lead Agency that have discretionary approval power or regulatory oversight over the Proposed Project or Project activities are considered “Responsible Agencies” (State CEQA Guidelines Section 15381). If the City approves the Proposed Project, subsequent implementation of various project components could require discretionary approval authority from, but not limited to, the following responsible agencies:

- California Regional Water Quality Control Board (RWQCB)
- South Coast Air Quality Management District (SCAQMD)

## **C. Entitlement Requests**

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

1. Pursuant to Los Angeles Municipal Code (“LAMC”) Section 11.5.7-C, a Project Permit Compliance Approval of the Central City West Specific Plan (“CCWSP”).
2. Pursuant to LAMC Section 11.5.7-F, the Applicant requests the following Specific Plan Exceptions of the Central City West Specific Plan:
  - a. To allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft.; as required by the CCWSP, Section 6.F-2,
  - b. To allow (0) zero-foot side yard setbacks for the east and west property lines for the North Building, in lieu of the 10 ft. required by the CCWSP, Section 6.F-2,
  - c. To allow a (0) zero-foot rear yard setback for the seven-story North Building, in lieu of the 19 ft. (15 ft.+ 1 ft. above the 3<sup>rd</sup> floor) required by the CCWSP, Section 6.F-2,
  - d. To allow a (0) zero-foot rear yard setback for the South Building in lieu of the 19 ft. (15 ft. above the 3<sup>rd</sup> floor of the 7 story building) required by the CCWSP, Section 6.F-6, and
  - e. To deviate from the street standards of 5<sup>th</sup> Street, as required by the CCWSP Appendix C.1.K to be consistent with the newly adopted Mobility Element.
1. Pursuant to LAMC Section 11.5.7.E a Specific Plan Project Permit Adjustment to average or reallocate the permitted density and floor area within the South Building portion of the site.
2. Pursuant to LAMC Section 12.21.G a Director’s Decision to allow a 10% increase in the qualifying area of interior open space up to a maximum of 35%, in lieu of 25% of the total required usable open space.

Pursuant to various sections of the LAMC the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route, removal of existing street trees, building and tenant improvements. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

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## ATTACHMENT B. EXPLANATION OF CHECKLIST DETERMINATIONS

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### INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based on the LA CEQA Thresholds Guide.

#### I. AESTHETICS. Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a-d: Potentially Significant Impact.** The Project Site is located on an infill lot within the downtown area of the City of Los Angeles and is currently improved with a three-level parking structure, one five-story commercial office and medical office building, and one four-story commercial office and medical office building. The properties surrounding the Project Site include commercial/retail, office, multi-family residential buildings, schools, the Good Samaritan Hospital, and the Bixel and Lucas Project construction site. 5<sup>th</sup> Street immediately borders the Project Site to the north. Multi-family residential buildings and an office building are located along the north side of 5<sup>th</sup> Street. Bixel Street immediately borders the southern portion of the Project Site to the east. A surface parking lot lies to the east of Bixel Street across from the Project Site. 6<sup>th</sup> Street immediately borders the southern portion of the Project Site. The Bixel and Lucas Project Site, currently under construction, borders the south side of 6<sup>th</sup> Street. Once operational, the Bixel and Lucas Project will consist of 648 dwelling units and approximately 40,000 square feet of ground floor commercial space. Commercial land uses and an educational services building (Para Los Niños) border the Project Site to the west. Located along Lucas Avenue, the Good Samaritan Hospital is located southeast of the Project Site, and the Para Los Niños – Evelyn Thurman Gratts Primary School is located to the northeast of the Project Site. The Proposed Project’s buildings would increase the height compared to the existing height of the commercial and medical office buildings. The Project’s buildings would be seven-stories and reach a maximum height of approximately 92 feet above grade for the South Building and 98 feet-2 inches above grade for the North Building. The Proposed Project would also increase the density of

the Project Site by proposing up to 369 residential dwelling units. The proposed land uses of the Project Site including residential and ground floor commercial uses would increase the utilization of the Project Site, especially during the evening hours due to an increase in residential activity and traffic. The Project Site is not a scenic vista and is not a focal point of a scenic vista from any off site vantage points. Development of the Proposed Project would alter local viewsheds, and change the pattern of light and glare within the immediate project vicinity. Although the Project Site is not considered a scenic vista and is not located on or within the viewshed of a city-designated scenic highway, the Project Site contains two buildings that have been identified as potentially eligible for listing as a historic resource by Survey LA (see response V(a), below). Therefore, the Project’s potential aesthetic impacts to scenic vistas, existing visual character or quality of the Project Site and its surroundings, and light and glare will be evaluated within the scope of the EIR.

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Production (as defined by Government Code section 51104 (g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-e. No Impact.** A significant impact may occur if a project were to result in (1) the conversion of state-designated agricultural land from agricultural use to another non-agricultural use; (2) the rezoning or conversion of farmland, forest land, timberland; (3) or conflict with a Williamson Act contract. The Project Site is zoned R5(CW)-U/6, C2(CW)-U/3, and C4(CW)-U/4.5 and has a corresponding land use designations of High Density Residential, Community Commercial, and Regional Center Commercial, respectively. The Project Site is located in a highly urbanized area within the City of Los Angeles, and the Project Site is currently completely developed with two buildings and a multi-level parking structure. The two buildings were constructed in 1956 and 1967, respectively. The parking structure was constructed in 1965. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2012” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site and the surrounding areas are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>5</sup> The Project Site is not currently used for any agricultural-related uses. The Proposed Project would not convert any farmland to a non-agricultural use. The Project would not result in the loss of farmland, forest land, or timberland. Further, the Project would not conflict with any Williamson Act contracts. Therefore, the Proposed Project would have no impact on agricultural resources or forested lands. As such, no further analysis of this issue is required.

**III. AIR QUALITY.** Where applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan or Congestion Management Plan?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a. Potentially Significant Impact.** A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would represent in some way a substantial hindrance to

<sup>5</sup> *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>, accessed February 2016.*

employing the policies or obtaining the goals of that plan. The Project is located within the South Coast Air Basin (Basin) and is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted criteria for determining the consistency with regional plans such as the Regional Comprehensive Plan and Guide and regional AQMP. These criteria include: 1) identifying whether the project would increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations and 2) identifying whether the project would exceed the assumptions utilized in preparing the AQMP. A significant impact may also occur if a project is inconsistent with the growth assumptions upon which the regional AQMP was based. The Proposed Project has the potential to generate short-term emissions during the construction phase and long-term emissions associated with the on-going operational activities of the Proposed Project. Whether the Proposed Project would conflict with or obstruct implementation of the AQMP will therefore be evaluated in the scope of the EIR.

**Response b. Potentially Significant Impact.** A Project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project related emissions would substantially contribute to an existing or projected air quality violation. Construction of the Proposed Project has the potential to generate air quality emissions on-site during earthwork and construction related activities. The long-term operation of the Project also has the potential to generate air quality emissions, primarily in the form of day-to-day activities and maintenance associated with residential uses and motor vehicle emissions from residents and visitors driving to and from the Project Site. The Project's air quality emissions will be quantified and analyzed in further detail in the EIR.

**Response c. Potentially Significant Impact.** A significant impact may occur if a project would add a considerable cumulative contribution to federal or State non-attainment pollutant. Development of the Proposed Project has the potential to add a cumulatively considerable contribution to air quality emissions. Therefore, further analysis of this issue will be analyzed in the EIR.

**Response d. Potentially Significant Impact.** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The potential of the Project to expose sensitive receptors to air pollutants will be analyzed in the EIR.

**Response e. Potentially Significant Impact.** A significant impact may occur if objectionable odors occur, which would adversely impact sensitive receptors. The Project includes approximately 22,000 square feet of ground-floor commercial space which would be comprised of retail, restaurant, coffee shop uses. As such, the commercial uses may generate excessive odors resulting from food preparation, cooking, and food waste. The Project's potential to generate odors would be analyzed in the EIR.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a: Less than Significant Impact.** Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is fully developed and does not provide critical habitat.

Based on the findings in the Project's Tree Report<sup>6</sup>, there are approximately fifteen (15) trees on the Project Site and three (3) street trees along the public right-of-way on 5<sup>th</sup> Street bordering the Project Site. There are no trees that fall under the category of protected species within the City of Los Angeles, Protected Tree Ordinance. Under Chapter IV, Section 46.01 of Article 6 in the Los Angeles Municipal Code, a "protected tree" means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one half feet above the ground level at the base of the tree: oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*); Southern California Black Walnut (*Juglans californica* vs. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*). Within the property there are three Brazilian Pepper trees (*Schinus terebinthifolius*), eight Ginkgo trees (*Ginkgo biloba*), two London Plane trees (*Platanus x acerifolia*), one American Sweet Gum, (*Liquidambar styraciflua*) and one fruit tree. All of these trees within the properties are growing naturally with limited encouragement. All of these trees appear to have been intentionally planted due to their location along the perimeter edge of the entire property. The fifteen property trees would be removed for proper re-grading and construction throughout the property. In addition, there are three Indian Laurel Fig trees (*Ficus microcarpa nitida*), which are street trees in the public right-of-way, located adjacent to the property along 5<sup>th</sup> Street. The three street trees would be impacted by the construction phases, and also be removed.

The City of Los Angeles Department of Public Works, Urban Forestry Division, provides guidance on the issue of construction impacts to trees within the City of Los Angeles. The Proposed Project would be subject to the Urban Forestry Division's standards for the anticipated removal of the fifteen on-site trees and three street trees during the construction phase of the Project. The eighteen trees are non-protected species. All significant (8-inch or greater in diameter trucked trees, or cumulative truck diameter trees) would be replaced at a 1:1 ratio with a minimum 24-inch box tree. Removal and replacement of the trees would be done in consultation with the Urban Forestry Division. Further, the Project must comply with the Federal Migratory Bird Treaty Act. Thus, the Proposed Project would not have the potential to conflict with any tree preservation ordinance, and any potential impacts associated with the removal of property trees and street trees would be less than significant.

**Response b-d: No Impact.** Based upon criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland or riparian habitat. A significant impact may occur if a project results in the interference with wildlife movement/migration corridors that may diminish the chances of long-term survival of a sensitive species. The Project Site is located within a highly urbanized area within the City of Los Angeles, and the Project Site is currently fully developed. For this reason, the Project Site does not contain any riparian habitat, wetlands, wildlife corridor or nursery site, or other sensitive natural community. Further, the Project Site is not within an area designated by an adopted habitat conservation plan, natural community conservation plan, or other approved

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<sup>6</sup> Lisa Smith, Registered Consulting Arborist, Tree Report, 1111 and 1125 W. 6<sup>th</sup> Street and 1330 W. 5<sup>th</sup> Street, Los Angeles, California 90017, January 9, 2015. (see Appendix B to this Initial Study)

habitat conservation plan. Additionally, the Project Site is also not located within a Significant Ecological Area according to the County of Los Angeles.<sup>7</sup> As such, the Proposed Project would not have an adverse effect on any federally protected wetlands as defined by Section 404 of the Clean Water Act, and the Proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species. Therefore, Proposed Project would have no impact upon wetlands, riparian habitat, or wildlife movement. As such, no further analysis of this issue is required.

**Response e: Less than Significant Impact.** A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. The Project Site is fully developed with one four-story commercial office and medical office building, one five-story commercial office and medical office building, and a parking structure and only contains ornamental trees and landscaping. No protected trees exist on-site. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. Based on preliminary review, there are fifteen (15) ornamental trees that were intentionally planted on the Project Site. In addition, there are three (3) street trees in the public right-of-way. These eighteen (18) trees are expected to be removed during construction and replaced in consultation with the Urban Forestry Division. The Proposed Project must comply with the Federal Migratory Bird Treaty Act, which establishes the Federal prohibition to pursue, hunt take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry or cause by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird... for the protection of migratory birds... or any part, nest, or egg of any such bird. If construction occurs during raptor breeding season, usually between February 1 and June 30, the loss of an active nest of any raptor species, including common raptors species would constitute a violation of Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. To ensure compliance with the law, if tree removals occur during the active nesting season, the Department of City Planning and Urban Forestry Division of the Bureau of Street Services will require the Applicant to provide evidence from a qualified biological expert documenting that any fallen trees are void of any nesting bird species prior to their removal. If nesting birds are present, the removal of the tree will need to be delayed until after the nest is vacated. None of the proposed tree removals contain any oak trees, sycamores, California Bay, Black Walnut, or other protected biological resources. Therefore, the Proposed Project would not conflict with local regulations pertaining to biological resources, and no further analysis of this issue is required.

**Response f: No Impact.** A significant impact would occur if the Project would be inconsistent with maps or policies of the approved local, regional or state habitat conservation plans. The Project Site is not included on any approved local, regional, or state habitat conservation plans.<sup>8</sup> Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, or with the provisions of an adopted Habitat Conservation Plan. No impact would occur and further analysis of this issue is not required.

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<sup>7</sup> *County of Los Angeles, Department of Regional Planning, Significant Ecological Areas and Coastal Resource Areas Policy Map, website: [http://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf), accessed February 2016.*

<sup>8</sup> *California Department of Fish and Wildlife, Conservation and Management of Wildlife and Habitat, website: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=15329&inline>, accessed February 2016.*

V. CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	■	□	□	□
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	□	□	■	□
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	□	■	□
d. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□

**Response a: Potentially Significant Impact.** The Project Site is currently developed with two commercial office and medical office buildings (located at 1111 W. 6<sup>th</sup> Street and 1125 W. 6<sup>th</sup> Street) and a parking garage (located at 1330 W. 5<sup>th</sup> Street). The two on-site buildings were constructed in 1956 and 1967, respectively. The parking structure was constructed in 1965. The building located at 1111 W. 6<sup>th</sup> Street is identified in Survey LA, and is flagged as “appears eligible for listing in the National Register, the California Register, and for local listing.” Survey LA also states that the building located at 1125 W. 6<sup>th</sup> Street appears eligible for listing in the California Register and for local listing.<sup>9</sup> Accordingly, based on these preliminary findings, a detailed historic analysis will be prepared by a qualified architectural historian for inclusion in the EIR.

**Response b-d: Less than Significant Impact.** A significant adverse effect could occur if grading or excavation activities associated with a project would disturb archaeological resources, paleontological resources, geologic features, or human remains which presently exist within a project site. The Project Site is not located in an area identified as potentially containing significant archaeological and paleontological resources, geologic features, or human remains. The Project would involve excavation and earthwork for the construction of the two-level below grade parking structure. The Project Site has already been developed and is surrounded by urban development. During the construction phase of the Proposed Project, there could be a possibility to encounter archaeological resources, paleontological resources, or human remains during construction. In the event that archaeological resources, paleontological resources, or human remains are encountered during the construction phase, work in the area of the find shall be halted until a qualified archaeologist and/or paleontologist has evaluated the find and provided recommendations for to comply with California Public Resources Code Section 21083.2 for the proper handling of archaeological and paleontological resources and with State Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 for the proper handling of human remains. Similarly, if any human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC)

<sup>9</sup> *City of Los Angeles Department of City Planning, Office of Historic Resources, Survey LA, Westlake Report Individual Resources, April 3, 2014.*

Section 5097.98. No further actions or mitigation measures beyond complying with applicable California Public Resource Code and California Health and Safety Code requirements are required. As such no further analysis on this issue is required.

<b>VI. GEOLOGY AND SOILS.</b> Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	■	□	□	□
ii. Strong seismic ground shaking?	■	□	□	□
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 or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	■	□	□	□
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	■	□	□	□
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?	□	□	□	■

**Response a-d: Potentially Significant Impact.** The Project is located within a seismically active region, as is all of southern California. As such, the Project Site is susceptible to strong earth movements resulting from earthquakes. Ground movement at the Project Site would be dependent upon the magnitude of the earthquake, the distance from the source, and the site response characteristics. Additionally, development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would

be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. The Project Site is located in a special grading area.<sup>10</sup> All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The Project’s impacts upon ground rupture, ground shaking, liquefaction, landslides, soil erosion, soil instability, and expansive soils will be evaluated by a qualified geotechnical engineer, and a Soils Report will be submitted to the Bureau of Building and Safety for review and approval. Project evaluation will refer to sources such as, but not limited to, the California Geological Survey, Alquist-Priolo Fault Zoning Map, the City’s Hillside Grading area, and the City’s General Plan Safety Element. As such, a detailed geotechnical analysis will be prepared by a qualified geotechnical engineer, and the Project’s geological impacts will be analyzed in the EIR.

**Response e: No Impact.** This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur and no further analysis is required.

**VII. GREENHOUSE GAS EMISSIONS**

Would the project:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact upon the environment?	■	□	□	□
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	■	□	□	□

**Responses a-b: Potentially Significant Impact.** Global climate change describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide [CO<sub>2</sub>], methane [CH<sub>4</sub>], and nitrous dioxide [N<sub>2</sub>O]) that capture heat radiated from the Earth’s surface, which in turn warms the atmosphere. This natural phenomenon is known as the “greenhouse effect.” That said, excessive human-generated greenhouse gas emissions can affect the global climate. Construction and operation of the Proposed Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. The Proposed Project’s construction and operational greenhouse gas emissions will be quantified using the CalEEMod modeling software (Version 2013.2.2), as recommended by CARB and the SCAQMD. The Project’s estimated GHG emissions, energy conservation features, and project design features that serve to reduce GHG emissions will be discussed in the EIR and compared to all applicable state, regional and local policies adopted for the purposes of mitigating the effects of

<sup>10</sup> City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed February 2016.

climate change. Thus, the Proposed Project’s generation of greenhouse gas emissions and consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emission of greenhouse gases will be analyzed in the EIR.

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

**Response a: Potentially Significant Impact.** A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project’s construction activities

are anticipated to use typical, although potentially hazardous, construction materials including gasoline and diesel fuel, paints, solvents, mastics, and other acidic or alkaline solutions that may require special handling, transport, and disposal. During the Project's operation, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Site and stored on-site. Since the Project may require the transport, use, and disposal of potentially hazardous materials, the potential for an impact to occur will be analyzed within the scope of the EIR.

**Response b: Potentially Significant Impact.** A preliminary investigation shows active underground storage tanks and past underground storage tanks (that have since been removed) in the vicinity of the Project Site. These underground storage tanks may have impacted soil and groundwater conditions in the Project Site area. Further, the two on-site buildings were constructed in 1956 and 1967, respectively. Due to the age of the existing buildings, the buildings could potentially contain asbestos-containing materials and lead paint. The operation of the project would utilize only limited amounts of common potentially hazardous materials such as cleaning fluids, which would comply with compliance standards for proper handling and storage. Additional analysis to assess the Project's potential to result in the upset or accidental release of hazardous materials will be further addressed within the scope of the EIR.

**Response c: Potentially Significant Impact.** There are three Los Angeles Unified School District schools within one-quarter mile of the Project Site; these schools are: (1) Para Los Niños – Evelyn Thurman Gratts Primary School, located at 474 S. Hartford Avenue directly west of the Project Site); (2) Evelyn Thurman Gratts Elementary School located at 309 Lucas Avenue, 0.15 miles north of the Project Site; and (3) Miguel Contreras Learning Complex located at 322 S. Lucas Avenue, 0.15 miles northeast of the Project Site. Due to the Project Site's close proximity to the aforementioned schools, additional analysis to assess the Project's potential hazardous impacts to the nearby schools will be included in the scope of the EIR.

**Response d: Potentially Significant Impact.** California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. Preliminary research shows that the Project Site may have compromised soil and groundwater conditions due to past and present underground storage tanks in the vicinity of the Project Site. The EIR will include further analysis with respect to any known hazardous materials and identify whether the Project Site or any adjacent land uses are listed as a hazardous waste disposal site, or are otherwise associated with any accidental releases of hazardous materials.

**Responses e and f: No Impact.** The Hawthorne Municipal Airport and the Los Angeles International Airport (LAX) are located approximately 10 and 11 miles southwest of the Project Site, respectively. Additionally, the Santa Monica Municipal Airport is located approximately 11 miles west of the Project Site. Therefore, the Project Site is not located within 2 miles of a public airport. The Project Site is also not located near a private airstrip. No impacts involving airports would occur, and no further analysis is required.

**Response g: Potentially Significant Impact.** A significant impact may occur if a project were to interfere with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere

with the execution of such a plan. The Proposed Project would involve new driveways and curb cuts to access the on-site parking garages. Construction of the Project may require temporary and/or partial road closures due to construction activities. Possible road closures may cause a temporary inconvenience, but they would not be expected to substantially interfere with emergency response or evacuation plans. Off-site roadway improvements may also be required as a form of mitigation to reduce the Project’s impacts upon the local roadways. As such, any impacts to emergency response or evacuation plans caused by the Proposed Project will be further analyzed in an EIR.

**Response h: Less than Significant Impact.** A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site and Project vicinity is located within a highly urbanized area within the City of Los Angeles. The Project Site is not located in Mountain Fire District or Fire Buffer Zone. The Project Site is served by LAFD Station No. 3, located at 108 N. Fremont Avenue, approximately 0.8 mile northeast of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A, fire protection response would be considered adequate. The Proposed Project would also incorporate fire safety recommendations of the Fire Department in the design of the buildings. The Proposed Project would require an approval of the proposed plot plan from the LAFD in order to obtain a building permit. As such, the Proposed Project’s potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires would be less than significant.

IX. HYDROLOGY AND WATER QUALITY. Would the proposal result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

- f. Otherwise substantially degrade water quality?
- g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h. Place within a 100-year flood plain structures which would impede or redirect flood flows?
- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- j. Inundation by seiche, tsunami, or mudflow?

**Response a: Less Than Significant Impact.** Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). These regulations include compliance with the Low Impact Development Ordinance (LID Ordinance) and Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the National Pollution Discharge Elimination System (NPDES), the Proposed Project would be responsible to prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement best management practices to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality. During the operation of the Proposed Project, the Proposed Project would be required to comply with the City of Los Angeles’s Low Impact Development (LID) Ordinance (No. 181899) and prepare a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-

0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. Therefore, the Project would result in a less than significant impact to water quality during its construction and operation, and no further analysis is required.

**Response b: Less Than Significant Impact.** Based upon the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

Because the Project Site is fully developed with two buildings and a multi-level parking structure, the Project Site is nearly 100 percent impervious. As such, nearly 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Storm water is removed from the Project Site primarily by sheet flow action across the paved surfaces towards storm water drains located throughout the Project Site and in the public right-of-way. Site stormwater from roofs, landscaped areas, and paved areas is directed to on-site concrete swales, which drain to the public right-of-way, and to on-site water drains. The subject property is connected to a municipal owned and maintained sewer system.

Based on the geotechnical investigation prepared for the Proposed Project, the groundwater on-site ranged between 325 to 338 feet above mean sea level (MSL), approximately 45 to 32 feet below the ground surface.<sup>11</sup> Historical groundwater levels are reported at an average elevation of 320 feet above MSL, approximately 50 feet below the ground surface. For design purposes, groundwater was assumed to be at an elevation of 340 feet above MSL (or approximately 30 feet below ground surface). The Proposed Project would excavate soils beneath the Project Site to a depth of approximately 32 feet below grade. As such, the Proposed Project may extend into the groundwater table. The Project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the project site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the Proposed Project's potential impacts relating to dewatering would be less than significant.

**Response c: Less Than Significant Impact.** A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area within the City of Los Angeles. There are no natural watercourses on the Project Site or in the vicinity of the Project Site. Because the Project Site is fully developed with buildings and paved surfaces, the Project Site is approximately 100 percent impervious.

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<sup>11</sup> *Geotechnical Professionals, Inc., Geotechnical Investigation for Sapphire, A Proposed Mixed-Use Development, 1111-1125 W. 6<sup>th</sup> Street and 1330 W. 5<sup>th</sup> Street, Los Angeles, California, December 11, 2014.*

Development of the Project would not increase site runoff or result in any changes to the local drainage patterns. The Project would be required to prepare a SWPPP and implement best management practices to reduce runoff and preserve water quality during construction the Proposed Project. Further, the Project would be required to implement an LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis on this issue is required.

**Response d: Less Than Significant Impact.** Based upon the criteria established in the L.A. CEQA Thresholds Guide, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site slopes slightly to the south, but there are no major hills or steep slopes in the Project vicinity. The Project Site is currently nearly 100 percent impervious and runoff is directed to the stormwater lines in the vicinity of the Project. There are several existing 15-inch diameter storm drain lines, which are owned and maintained by the City of Los Angeles, located adjacent to the Project Site along Lucas Avenue and 6<sup>th</sup> Street. Stormwater runoff along Bixel Street is directed towards the stormwater pipes on 6<sup>th</sup> Street, and stormwater runoff along 5<sup>th</sup> Street is directed towards the stormwater pipes on Lucas Avenue.<sup>12</sup> As discussed above, the Project would implement a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. Further, there are no nearby streams or rivers and the Proposed Project could not alter any watercourse. As such, no impact would occur and no further analysis is required on this issue.

**Response e: Less Than Significant Impact.** Based upon the criteria established in the LA CEQA Thresholds Guide, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level that exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

Several existing approximately 15-inch diameter storm drain lines, which are owned and maintained by the City of Los Angeles, are located adjacent to the Project Site along Lucas Avenue and 6<sup>th</sup> Street. Stormwater runoff along Bixel Street is directed towards the stormwater pipes on 6<sup>th</sup> Street, and stormwater runoff along 5<sup>th</sup> Street is directed towards the stormwater pipes on Lucas Avenue.<sup>13</sup> The Site is nearly 100 percent impervious and all surface water is directed off-site to the adjacent storm drain system. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site

<sup>12</sup> *City of Los Angeles, Department of Public Works, NavigateLA, website: [www.navigatea.lacity.org/navigatea/](http://www.navigatea.lacity.org/navigatea/), accessed February 2016.*

<sup>13</sup> *City of Los Angeles, Department of Public Works, Navigate LA, website: [www.navigatea.lacity.org/navigatea/](http://www.navigatea.lacity.org/navigatea/), accessed November 2015.*

currently is and would continue to be collected on the Project Site and directed towards existing storm drains in the Project vicinity. Pursuant to local practice and City policy stormwater retention will be required as part of the Low Impact Development (LID) Ordinance/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Proposed Project will be required to demonstrate compliance with LID Ordinance standards and retain and treat the first  $\frac{3}{4}$  inch of rainfall in a 24-hour period, which will reduce the Proposed Project's impact to the stormwater infrastructure. Therefore, Proposed 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 and potential impacts to surface water quality would be less than significant. No further analysis would be required.

**Response f: Less Than Significant Impact.** A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Proposed Project does not include potential sources of contaminants that could potentially degrade water quality and would comply with all federal, state, and local regulations governing stormwater discharge. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). These regulations include compliance with the Low Impact Development Ordinance (LID Ordinance) and Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project would be required to prepare a SWPPP and implement best management practices to reduce runoff and preserve water quality during construction of the Proposed Project. Further, the Project would be required to implement a LID Plan during the Project's operation, which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing  $\frac{3}{4}$ -inch of rainfall in a 24-hour period. Therefore, a less than significant impact would occur. No further analysis on this issue is required.

**Response g-h: No Impact.** The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods nor is it located within a City-designated 100-year or 500-year flood plain.<sup>14</sup> The Project Site is located in an area of minimal flooding and would not introduce people or structures to an area of high flood risk. Therefore, the Proposed Project would not place housing in an area with any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur, and no further analysis of this issue is required.

**Response i-j: No Impact.** A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche. A significant impact would occur if the Project Site is sufficiently close to the ocean or other body of water to be potentially at risk of the effects of seismically-induced tidal phenomena or mudflow. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

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<sup>14</sup> Federal Emergency Management Agency, 2008, website: <https://hazards.fema.gov/femportal/wps/portal/>, accessed November 2015.

The Los Angeles River is located approximately 2 miles east of the Project Site, which normally has a relatively short water level during a majority of the year. Based on the lack of such large enclosed water bodies nearby and the Project Site’s distance from the Pacific Ocean, seiches and tsunami risks are considered nil. Further, according to the City of Los Angeles, General Plan Safety Element, the Project Site is not located within a marked flood, inundation, or tsunami area.<sup>15</sup> The Project Site is located within a highly developed area within the Westlake Community. As such, the potential for mudflows are considered low. The Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving flooding (including flooding as a result of the failure of a levee or dam), seiches, tsunamis, or mudflows. No further analysis is required.

X. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a: Less Than Significant Impact.** A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project that involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located within an urbanized area of the Westlake Community Plan area. Current vehicular access to the Project Site is provided via two driveways along 5<sup>th</sup> Street and through the abutting alleyway. Proposed vehicular access to the South Building parking would be provided by one full-access driveway on the north side of 6<sup>th</sup> Street, and access to the North Building parking would be provided by one full-access driveway on the north side of the alleyway on-site. No separation of uses or disruption of access between land use types would occur as a result of the Proposed Project. The properties surrounding the Project Site include commercial/retail, office, multi-family residential buildings, schools, the Good Samaritan Hospital, and the Bixel and Lucas Project construction site. The Proposed Project’s mixed-use building will be compatible with the immediate neighborhood. The Proposed Project is an infill development and would not disrupt or divide the physical arrangement of the established community, and no impact would occur. Therefore, no further analysis is required.

<sup>15</sup> *City of Los Angeles Department of City Planning, City of Los Angeles General Plan, Safety Element Exhibit G: Inundation and Tsunami Hazard Areas in the City of Los Angeles, March 1994.*

**Response b: Potentially Significant Impact.** A significant impact may occur if a project is inconsistent with the General Plan, the Urban Design guidelines, zoning designations, or other planning policies, plans, or regulations that are applicable to the Project Site and would cause adverse environmental effects, which the applicable policies or regulations are designed to avoid or mitigate. The Project Site is located within the Crown Hill District of the Central Subarea of the Central City West Specific Plan and within the Westlake Community Plan Area in the City of Los Angeles. The Proposed Project is zoned CW, which signifies that development on the Project Site is guided by the Central City West Specific Plan. The Project Site has a land use category of R5(CW)-U/6 on the parcels fronting 5<sup>th</sup> Street; C4(CW)-U/4.5 on the parcels fronting Bixel Street and the three abutting parcels on 6<sup>th</sup> Street; and C2(CW)-U/3 on the two remaining parcels on 6<sup>th</sup> Street. The General Plan land use designation for the Project Site is Community Commercial across the C2(CW)-U/3 parcels; Regional Center Commercial across the C4(CW)-U/4.5 parcels; and High Density Residential on the R5(CW)-U/3 parcels. The “U” designation defines the height allowed for the Project Site. Specific Plan Section 8A states that the Project Site buildings should not exceed 1,218 feet above the mean sea level, and a licensed survey establishing the mean sea level (MSL) elevation is required. Additionally, the Specific Plan allows for the averaging of floor area ratio across the commercial land use categories parcels on the Project Site. The Project Site has an allowed FAR of 6:1 on the R5 parcels, 4.5:1 on the C4 parcels, and 3:1 on the C2 parcels. The Specific Plan determines that the R5(CW), C2(CW), and C4(CW) land use categories shall follow the use and area regulations of the LAMC for R5 zone, C2 zone, and C4 zone, respectively. Where the Specific Plan does not provide provisions on setbacks and yard area, the Project shall comply with the regulations on setbacks and yard area provided in the LAMC. Further, the Applicant requests Specific Plan Exceptions to reduce building setbacks; a Specific Plan Project permit adjustment to average permitted density and floor area within the South Building; and a Director’s Decision to allow a 10% increase in the qualifying area of interior open space up to a maximum of 35%, in lieu of 25% of the total required usable open space. As such, the EIR will provide an analysis of the Proposed Project’s consistency with the Los Angeles General Plan, Los Angeles Municipal Code, the Westlake Community Plan, the Central City West Specific Plan, and other applicable planning policies and regulations.

**Response c: No Impact.** As discussed in Question IV(f) above, no habitat conservation plans or natural community conservation plans presently exist which govern any portion of the Project Site. The Project Site is located in an area that has been previously disturbed, graded and developed. The Proposed Project would not have the potential to conflict with any applicable habitat conservation plan or natural community conservation plan. No impact would occur and no further analysis of this issue is required.

XI. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a-b: No Impact.** A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, or if the project would convert an existing or future regionally-important mineral extraction use to another use, or if the project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located near any oil fields and no oil extraction activities have historically occurred on or are presently conducted at the Project Site. Furthermore, the Project Site is not in an area identified by the City of Los Angeles as containing significant mineral deposits that would be of value to the region and the residents of the state.<sup>16</sup> No locally designated resources would be impacted by the Proposed Project, therefore no impact would occur. As such, no further analysis of this issue is required.

XII. NOISE. Would the project result in:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response a: Potentially Significant Impact.** Construction of the Proposed Project would require the use of construction equipment during grading, hauling, establishing building foundations, installation of utility lines and services, and other construction activities. The potential exists for construction noise to be generated in excess of standards established by the City of Los Angeles. The Project’s operational activities, such as traffic and increased human activity on-site have the potential to increase ambient noise levels above the City’s land use/noise compatibility criteria as identified in the Noise Element of the General Plan. Therefore, further analysis of this

<sup>16</sup> *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, Sept. 1996. <http://planning.lacity.org/cwd/gnlpln/safteyelt.pdf>*

issue will be included within the scope of the EIR.

**Response b: Potentially Significant Impact.** A significant impact would occur if the Project exposed people to or generated excessive groundborne vibration or groundborne noise levels. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second, and in the United States is referenced as vibration decibels (VdB). Construction of the Project has the potential to generate groundborne vibration that could impact surrounding land uses. The EIR will further analyze the Project’s potential to generate excessive vibration and groundborne noise and impact surrounding land uses during construction.

**Response c-d: Potentially Significant Impact.** A significant impact may occur if the Proposed Project were to result in a substantial temporary or permanent increase in ambient noise levels in the Project vicinity. The Project’s construction and operational activities, such as traffic and increased human activity on-site associated with the Proposed Project’s residential and commercial operational components, have the potential to increase ambient noise levels above existing levels. Such operational components that may increase the ambient noise levels in the area include HVAC systems, increased vehicle trips, open courtyards, sky deck, pool deck, and other outdoor amenity spaces. Therefore, further analysis of this issue will be included within the scope of the EIR.

**Response e: No Impact.** A significant impact may occur if a project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near the Project Site. The Project Site is not located within an airport land use plan. The closest airports are the Hawthorne Municipal Airport and the Los Angeles International Airport (LAX), located approximately 10 miles and 11 miles southwest of the Project Site, respectively. Additionally, the Santa Monica Municipal Airport is located approximately 11 miles west of the Project Site. The Project Site is not located within two miles of a public airport. Therefore, no impact would occur and no further analysis of this issue is required.

**Response f: No Impact.** A significant impact may occur if the Project is within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and no further analysis is required.

XIII. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

**Response a: Potentially Significant Impact.** A significant impact may occur if a project were to locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Proposed Project would include the construction of approximately 369 multi-family residential units and 22,000 square feet of ground floor retail. The Project’s consistency with all applicable regional and local planning documents, including SCAG’s 2008 Regional Comprehensive Plan for the SCAG Region (“2008 RCP”), SCAG’s 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (“2012-2035 RTP/SCS), the City’s Housing Element of the General Plan, and the Central City West Community Plan. The Project Site is considered an infill site within a Transit Priority Area as defined by CEQA and is designated as such by the City’s Zoning Information database (ZI 2452).<sup>17</sup> The Project Site is located within ½ mile of an existing rail transit stations, the 7<sup>th</sup> Street/Metro Center station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project’s mixed-use nature and close proximity to neighborhood-serving commercial/retail land uses and regional transit would encourage future residents to live and work in the same area. The potential of the Proposed Project to directly and indirectly induce substantial population growth will be analyzed in the EIR.

**Response b- c: No Impact.** A significant impact may occur if a project would result in displacement of existing housing or a substantial numbers of people, necessitating construction of replacement housing elsewhere. The Project Site is currently developed with one four-story commercial office and medical office building, one five-story office commercial office and medical building, and one three-level parking structure. No residential uses exist on-site. Thus, the Proposed Project would not displace any housing or substantial numbers of people, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur and no further analysis is required.

**XIV. PUBLIC SERVICES.**

**a.** Would the project result in substantial adverse physical impacts associated with the provision of 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:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other Public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>17</sup> City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed February 2016.

**Response a:**

**Fire Protection: Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project based upon response time, access, or fire hydrant/water availability during project operations. The Project Site is currently served by LAFD Station No. 3, located at 108 N. Fremont Avenue, approximately 0.8 mile northeast of the Project Site. The potential impact of the Proposed Project on fire protection services will be analyzed in the EIR.

**Police Protection: Potentially Significant Impact.** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Proposed Project, necessitating a new or physically altered police station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Project is currently served by LAPD Rampart Community Police Station, located at 1401 W. 6<sup>th</sup> Street, approximately 0.3 mile west of the Project Site. The potential impact of the Project on police protection services will be analyzed in the EIR.

**Schools: Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2. The Project Site is currently served by two elementary schools (Para Los Ninos-Evelyn Thurman Gratts and Gratts Learning Academy for Young Scholars), one middle school (John H. Liechty Middle School), and four high schools (Miguel Contreras Learning Complex, Ramon C. Cortines School of Visual and Performing Arts, Belmont Senior High School, and Edward Roybal Learning Center). Based on LAUSD Student Generation rates, the Proposed Project would generate approximately 57 elementary students, 15 middle school students and 33 high school students, for a total of approximately 106 students. As a matter of law, the Project Applicant will be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Pursuant to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for purposes of CEQA. Thus, the potential for the Proposed Project to impact school facilities and services will be reduced to less than significant levels and no further analysis is warranted. Localized construction impacts upon local schools such as construction-related air quality emissions, construction noise, and pedestrian safety impacts will be addressed in the respective chapters of the EIR.

**Parks: Less Than Significant Impact.** A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate the projected population increase resulting from the implementation of a project, or if the Proposed Project results in the construction new recreation and park facilities that could create significant direct or indirect impacts to the environment. The Proposed Project includes the development of residential uses that will increase the permanent residential population occupying the Project area. Development of the Proposed Project would result in an increase of 1,158 new residents to the area. Based on the City's standard parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with approximately 4.63 acres of additional public parkland. The Project will contribute towards the achievement of such goal through a combination of (1) on-site open space proposed within the Project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area. The Proposed Project would provide approximately 43,675 square feet of total common open space and amenities on-site available exclusively to serve Project residents and their guests. The Project may include a variety of on-

site amenities including, but not limited to, common open space, banquet seating, sky deck, courtyard, fitness center, soft lounge seating, cabana, pool and spa, ping-pong table, barbecue pit, outdoor kitchen island with seating, dog wash station and dog relief area. In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a tax of \$200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the Department of Building and Safety, shall be deposited into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City’s mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, the Proposed Project’s impact upon parks and recreational facilities would be less-than-significant.

**Other Public Facilities: Less than Significant Impact.** A significant impact would occur if the Project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site and the Project area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) System provides services at the Central Library, 8 Regional Branch Libraries and 64 Community Branch Libraries. There are a total of seven library facilities within two miles of the Project Site. The closest facility is the Central Library located at 630 W. 6<sup>th</sup> Street, approximately 0.47 miles from the Project Site. The Proposed Project is anticipated to increase the resident population in the Project Area, and would likely increase demands upon existing library facilities.<sup>18</sup> Central Library is approximately 500,000 square feet in size and has approximately 6.3 million items. It serves approximately 7,000 people a day and maintains a staff of 150 employees. The Central Library currently meets the library demands of the surrounding community and would be able to meet the Proposed Project’s demand for library services. The potential impact of the Project on library services would be less than significant as there are existing libraries within the community to serve the proposed residents; and the LAPL does not have any plans to expand or increase services as a direct result of the Proposed Project. Therefore, no further analysis is required.

**XV. RECREATION.**

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

**Response a: Less Than Significant Impact.** A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or causes premature deterioration of the park facilities. As

<sup>18</sup> Based on a generation rate of 3.11 residents per multi-family dwelling units. Source: <http://cityplanning.lacity.org/DRU/Loc/Frame.cfm?geo=CP&loc=Wlk&sgo=ct&rpt=PnH&yrc=Y09>, accessed November 2015.

discussed in Section XIV, Parks, above, the Proposed Project’s impact upon parks and recreational facilities would be reduced to less-than-significant levels with the payment of the applicable Dwelling Unit Construction Tax for construction of apartment buildings. As such no further analysis if this issue is required.

**Response b: Less Than Significant Impact.** Development of the Project has the potential to increase demands upon recreational facilities that may require the construction of new facilities or expansion of recreation facilities. The Project proposes the development of 369 multi-family dwelling units. The Proposed Project would include the construction of approximately 40,675 square feet of on-site open space and recreation facilities on-site that would be available exclusively to serve the Project residents and their guests. The impacts associated with the construction of these amenity areas will be addressed in the respective sections of the EIR, such as air quality, noise, land use consistency, and water demand. Furthermore, as stated above, the Proposed Project’s impact upon parks and recreational facilities would be reduced to less-than-significant levels with the payment of the applicable Dwelling Unit Construction Tax for construction of apartment buildings.

<b>XVI. TRANSPORTATION AND TRAFFIC.</b> Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a: Potentially Significant Impact.** A significant impact may occur if the project were to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit. The Proposed Project would include the development of 369 multi-family dwelling units and 22,000 square feet of ground-floor retail. As such, the Project would have the potential to increase vehicle trips to and from the Site, increase pedestrian activity on the Site and in the Project Site area, and increase demand for mass transit within the Project area. The Project would have the potential to impact the circulation system and area roadways. The Proposed Project's consistency with applicable plans and policies related to traffic and circulation, pedestrian flows, mass transit utilization and bicycle routes will also be evaluated in the EIR.

**Response b: Potentially Significant Impact.** A significant impact may occur if there is a conflict with the adopted Congestion Management Program (CMP) . The Proposed Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to the Project Site and in the Project vicinity. The impact of Project's additional traffic including any potential conflict with the adopted CMP will be evaluated within the scope of the EIR.

**Response c: No Impact.** The Project does not contain any aviation-related uses, and the Project would not include the development of any aviation-related uses. The closest airports are the Hawthorne Municipal Airport and the Los Angeles International Airport (LAX), located approximately 10 miles and 11 miles southwest of the Project Site, respectively. Additionally, the Santa Monica Municipal Airport is located approximately 11 miles west of the Project Site. Thus, the Project would have no impact on air traffic patterns, and no further analysis of this issue is required.

**Response d: Potentially Significant Impact.** A significant impact may occur if the Proposed Project includes a new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in such a way as to create hazard conditions. Vehicular access to the Project's North Building parking would be provided via the east-west alley that runs parallel to and between 5<sup>th</sup> and 6<sup>th</sup> Streets. Vehicular access to the Project's South Building parking would be provided via two driveways: one driveway that would intersect the north side of 6<sup>th</sup> Street and one driveway off of the aforementioned east-west alley. The Proposed Project may also require temporary lane or sidewalk closures and/or detours during the construction process. Therefore, the EIR will analyze the Proposed Project's potential to result in traffic hazards and will address pedestrian safety impacts associated with the Project's construction.

**Response e: Potentially Significant Impact.** A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the Los Angeles Fire Department, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The Project may temporarily affect vehicular and pedestrian flow during the construction phase. The EIR will analyze the Proposed Project's potential impacts on emergency access.

**Response f: Potential Significant Impact.** A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities location on-site or off-site. The Proposed Project could have the potential to alter the impacts on alternative transportation facilities. The potential of the Proposed Project to conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

XVII. UTILITIES. Would the project:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response a: Less Than Significant Impact.** A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. The Project area is presently served by a network of sewer lines that are located beneath most of the major streets located within the Project area. Wastewater currently generated at the Project Site is transmitted via sewer pipes running under 5<sup>th</sup> Street, 6<sup>th</sup> Street, and Bixel Street. Sewage from the 8-inch line on 5<sup>th</sup> Street connects to a 8-inch line on Lucas Avenue. The flow then connects with the 8-inch line along W. 6<sup>th</sup> Street and flows west along W. 6<sup>th</sup> Street. Sewage from the 8-inch line on Bixel Street connects directly to W. 6<sup>th</sup> Street and flows west along W. 6<sup>th</sup> Street.<sup>19</sup> Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Therefore, a less than significant impact would occur.

**Response b: Potentially Significant Impact.** A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacities of water and wastewater facilities currently serving the Project Site would be exceeded. The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. And as previously mentioned, the Project Site is located within the HTP service area. The Project's water demand and wastewater generation will be analyzed in the EIR.

**Response c: Less than Significant Impact.** A significant impact may occur if the volume of stormwater runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded or resulting in the construction of new stormwater drainage facilities. There are several existing 15-inch diameter storm drain lines, which are owned and maintained by the City of Los Angeles, located adjacent to the Project Site along Lucas Avenue and 6<sup>th</sup> Street. Stormwater runoff along Bixel Street is directed towards the stormwater pipes on 6<sup>th</sup> Street, and stormwater runoff along 5<sup>th</sup> Street is directed towards the stormwater pipes on Lucas Avenue. Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the Project vicinity. During the operation of the Proposed Project, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181899) and prepare a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¼-inch of rainfall in a 24-hour period in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. Thus, the rate of post-development runoff and pollutants would be reduced under the Proposed Project. Therefore, Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and a less than significant impact would occur.

**Response d: Potentially Significant Impact.** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The estimated water demand of the Proposed Project would be calculated based on the demand rates by land use listed in the L.A.

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<sup>19</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, NavigateLA, website: <http://navigatea.lacity.org/navigatea/>, accessed February 2016.*

CEQA Thresholds Guide (2006) Exhibit M.2-12. The water demand would then be compared to the future water supply demands in the Urban Water Management Plan and the filtration capacity of the Los Angeles Aqueduct Filtration Plant. The potential impacts associated with the availability of water supplies to serve the Proposed Project will be analyzed in the EIR.

**Response e: Potentially Significant Impact.** A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The estimated wastewater generation rates of the Proposed Project would be calculated based on the generation rates by land use listed in the L.A. CEQA Thresholds Guide (2006) Exhibit M.2-12. The estimated wastewater generation would then be compared to the available capacity of the HTP to assess whether the HTP has sufficient capacity to treat wastewater from the Proposed Project. The potential impacts associated with the provision of wastewater treatment services to the Project will be analyzed in the EIR.

**Response f: Potentially Significant Impact.** A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The City of Los Angeles is serviced by the Sunshine Canyon Landfill and the Chiquita Canyon Landfill. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 64.68 million tons. Chiquita Canyon Landfill currently has a remaining capacity of 1.83 million tons. Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted capacity of approximately 66.51 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 23 years, and the Chiquita Canyon Landfill has an estimated remaining life of 2 years.<sup>20</sup> An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 48,114,000 tons (a 43-year life expectancy based on 2014 average daily disposal of 3,558 tons per day or 15 years based on the maximum permitted rate of disposal of 10,000 tons per day).<sup>21</sup> The potential impacts associated with the ability of the local landfills to serve the Proposed Project will be analyzed in the EIR.

**Response g: Potentially Significant Impact.** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50% by the year 2000 and a statewide goal of 75% by 2020. In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. As reported by the Bureau of

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<sup>20</sup> *County of Los Angeles Department of Public Works, 2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, pages 31 and 32, December 2015.*

<sup>21</sup> *County of Los Angeles Department of Public Works, 2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, page 60, December 2015.*

Sanitation in 2009, the City had achieved a waste diversion rate of 65%. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.<sup>22</sup> The Proposed Project would be required to comply with applicable regulations regarding solid waste disposal. The Proposed Project’s potential impacts associated with federal, state, and local statutes and regulations related to solid waste will be analyzed in the EIR.

**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c. Does the project have environmental effects, which cause substantial adverse effects on human beings, either directly or indirectly?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Response a: Potentially Significant Impact.** A significant impact may occur if a project would degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The Project Site is located in an urban setting and is currently developed with two commercial office and medical office buildings and a three-level parking structure. The Project Site does not provide any suitable habitat to support riparian habitat or sensitive species. Thus, the Proposed Project’s potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal is less than significant. Nevertheless, because the Project has the potential to degrade the quality of the environment in other areas such as air quality and water quality which could indirectly affect animal and plant life, such impacts will be evaluated in the scope of the EIR. Further,

<sup>22</sup> *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

as discussed in Section V, Cultural Resources, the two commercial office and medical office buildings on-site have been identified in Survey LA as potentially eligible for listing in the National Register, State Register, or as a local listing. The building at 1111 West 6<sup>th</sup> Street was assigned status codes of: 3S (appears eligible for National Register as an individual property through survey evaluation); 3CS (appears eligible for California Register as an individual property through survey evaluation); and 5S3 (appears to be eligible for local listing or designation through survey evaluation). The building at 1125 West 6<sup>th</sup> Street was assigned status codes of 3CS (appears eligible for California Register as an individual property through survey evaluation); and 5S3 (appears to be eligible for local listing or designation through survey evaluation). The Project's potential impact upon cultural resources will be evaluated in the EIR. Impacts associated with biological resources including fish or wildlife species and/or rare or endangered plant or animal species were concluded to be less than significant as addressed under Section IV, Biological Resources.

**Response b: Potentially Significant Impact.** A significant impact may occur if a project, in conjunction with other related projects in the area of the Proposed Project, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The EIR will address cumulative impacts for each potentially significant impact category, including aesthetics, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, transportation/traffic, and utilities, as identified in items I through XVII, above, and will also address the Project's energy impacts pursuant to Appendix F of the State CEQA Guidelines.

**Response c: Potentially Significant Impact.** A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As identified in this Initial Study, the Proposed Project has the potential to result in significant impacts. Impacts for each potentially significant impact category identified in items I through XVII above, will be individually addressed in the EIR to analyze the potential environmental impacts of the Proposed Project.