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
MITIGATED NEGATIVE DECLARATION
Central City Community Plan Area

Main Street Park & Mixed Use

CPC-2016-3824-GPA-VZC-HD-MSC-SPR

ENV-2016-3825-MND

Project Location: 1100-1146½ S. Main Street and 106-112 E. 11th Street Los Angeles, CA 90015

Council District: 14

Project Description: The Proposed Project includes the demolition of the existing commercial buildings on the Project Site and the construction of an 8-story mixed-use building (92 feet in height), which includes 379 apartment units and 25,810 square feet of ground floor retail/creative office space. Eleven percent of the residential dwelling units would be reserved as very low-income units (42 dwelling units). The Proposed Project would provide a total of 429 vehicle parking spaces, which includes 358 spaces for the residential uses and 71 spaces for retail and office use in accordance with the Los Angeles Municipal Code ("LAMC") requirements. Of the 71 parking spaces provided for commercial uses, 45 spaces would be provided for the Harris Building located at 110 W. 11th Street. Parking on the Project Site would be provided in three subterranean levels and on the ground floor level. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. Pursuant to the Bicycle Ordinance, the Proposed Project would provide a total of 392 long-term and 51 short-term bicycle parking spaces on-site. The Proposed Project meets the LAMC requirements for open space by providing approximately 36,650 square feet of open space and amenity areas. The Proposed Project would include 354,100 square feet of total floor area on a 68,342 square-foot site, resulting in a floor area ratio (FAR) of 5.18:1.

The Applicant is requesting the following discretionary actions: (1) Pursuant to LAMC Section 17.01, a one-lot subdivision vesting tentative tract map for 379 residential units; (2) Pursuant to LAMC Section 16.05, site plan review for a project that results in an increase of 50 or more dwelling units; (3) Pursuant to LAMC Section 11.5.6, a General Plan amendment to the Central City Community Plan from "Light Industrial" to "Regional Center Commercial,"; (4) Pursuant to LAMC Section 12.32.Q, a vesting zone change and height district change from M2-2D to C2-4D, to allow for development of the site as proposed with a D limitation of 5.2:1 FAR; (5) Pursuant to LAMC Section 12.21.G(3), a Director's Decision for 10 percent reduction in open space. The Proposed Project would also require 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 (for the export of approximately 115,000 cy of soil), and removal of existing street trees (seven Canary Pine trees with diameters ranging from 9.5 inches to 20 inches) and buildings, ranging in age from 37 years to 108 years old.

APPLICANT:
Frontier Holdings East, LLC,
Frontier Holdings South LLC. and
Regal Group LLC

PREPARED BY:
Parker Environmental Consultants

ON BEHALF OF:
The City of Los Angeles
Department of City Planning

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		**COUNCIL DISTRICT:** 14 – Huizar
PROJECT TITLE: Main Street Park & Mixed Use	**ENVIRONMENTAL CASE:** ENV-2016-3825-MND	**CASE NO.** CPC-2016-3824-GPA-VZC-HD-MSC-SPR

PROJECT LOCATION: 1100-1146½ S. Main Street and 106-112 E. 11th Street Los Angeles, CA 90015

PROJECT DESCRIPTION: The Proposed Project includes the demolition of the existing commercial buildings on the Project Site and the construction of an 8-story mixed-use building (92 feet in height), which includes 379 apartment units and 25,810 square feet of ground floor retail/creative office space. Eleven percent of the residential dwelling units would be reserved as very low-income units (42 dwelling units). The Proposed Project would provide a total of 429 vehicle parking spaces, which includes 358 spaces for the residential uses and 71 spaces for retail and office use in accordance with the Los Angeles Municipal Code ("LAMC") requirements. Of the 71 parking spaces provided for commercial uses, 45 spaces would be provided for the Harris Building located at 110 W. 11th Street. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. Pursuant to the Bicycle Ordinance, the Proposed Project would provide a total of 392 long-term and 51 short-term bicycle parking spaces on-site. The Proposed Project meets the LAMC requirements for open space by providing approximately 36,650 square feet of open space and amenity areas. The Proposed Project would include 354,100 square feet of total floor area on a 68,342 square foot site, resulting in a floor area ratio (FAR) of 5.18:1. The Applicant is requesting the following discretionary actions: (1) Pursuant to LAMC Section 17.01, a one-lot subdivision vesting tentative tract map for 379 residential units; (2) Pursuant to LAMC Section 16.05, site plan review for a project that results in an increase of 50 or more dwelling units; (3) Pursuant to LAMC Section 11.5.6, a General Plan amendment to the Central City Community Plan from "Light Industrial" to "Regional Center Commercial,"; (4) Pursuant to LAMC Section 12.32.Q, a vesting zone change and height district change from M2-2D to C2-4D, to allow for development of the site as proposed with a D limitation of 5.2:1 FAR; (5) Pursuant to LAMC Section 12.21.G(3), a Director's Decision for 10 percent reduction in open space. The Proposed Project would also require 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 (for the export of approximately 115,000 cy of soil), and removal of existing street trees (seven Canary Pine trees with diameters ranging from 9.5 inches to 20 inches) and buildings, ranging in age from 37 years to 108 years old.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Frontier Holdings East, LLC, Frontier Holdings South LLC and Regal Group LLC
888 S. Figueroa Street, Suite 1900, Los Angeles, CA 90017

FINDING: The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this Project. The mitigation measures outlined on the attached pages would reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the adopted mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Jennifer Caira	City Planner	(213) 978-1165
ADDRESS 200 North Spring Street, 7th Floor Los Angeles, CA 90012	**SIGNATURE (Official)** Barbara Lamb	**DATE** Oct. 4, 2017

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 14	**DATE:**
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2016-3825-MND	**RELATED CASES:** CPC-2016-3824-GPA-VZC-HD-MSC-SPR	
PREVIOUS ACTIONS CASE NO.	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION: The Proposed Project includes the demolition of the existing commercial buildings on the Project Site and the construction of an 8-story mixed-use building (92 feet in height), which includes 379 apartment units and 25,810 square feet of ground floor retail/creative office space. Eleven percent of the residential dwelling units would be reserved as very low-income units (42 dwelling units). The Proposed Project would provide a total of 429 vehicle parking spaces, which includes 358 spaces for the residential uses and 71 spaces for retail and office use in accordance with the Los Angeles Municipal Code ("LAMC") requirements. Of the 71 parking spaces provided for commercial uses, 45 spaces would be provided for the Harris Building located at 110 W. 11th Street. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. Pursuant to the Bicycle Ordinance, the Proposed Project would provide a total of 392 long-term and 51 short-term bicycle parking spaces on-site. The Proposed Project meets the LAMC requirements for open space by providing approximately 36,650 square feet of open space and amenity areas. The Proposed Project would include 354,100 square feet of total floor area on a 68,342 square foot site, resulting in a floor area ratio (FAR) of 5.18:1. The Applicant is requesting the following discretionary actions: (1) Pursuant to LAMC Section 17.01, a one-lot subdivision vesting tentative tract map for 379 residential units; (2) Pursuant to LAMC Section 16.05, site plan review for a project that results in an increase of 50 or more dwelling units; (3) Pursuant to LAMC Section 11.5.6, a General Plan amendment to the Central City Community Plan from "Light Industrial" to "Regional Center Commercial,"; (4) Pursuant to LAMC Section 12.32.Q, a vesting zone change and height district change from M2-2D to C2-4D, to allow for development of the site as proposed with a D limitation of 5.3:1 FAR; (5) Pursuant to LAMC Section 12.21.G(3), a Director's Decision for 10 percent reduction in open space. The Proposed Project would also require 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 (for the export of approximately 115,000 cy of soil), and removal of existing street trees (seven Canary Pine trees with diameters ranging from 9.5 inches to 20 inches) and buildings, ranging in age from 37 years to 108 years old.

ENVIRONMENTAL SETTING: The Project Site includes ten parcels (Assessor Parcel No. 5139-016-024, 5139-016-023, 5139-016-022, 5139-016-006, and 5139-016-007) that includes 68,342 square feet of lot area (1.57 acres). The Project Site is currently occupied by seven one- and two-story commercial buildings. The surrounding properties are developed with commercial/retail, office, light industrial, and mixed-use land uses. Further details are provided in the expanded IS/MND analysis (attached).

PROJECT LOCATION: 1100-1146½ S. Main Street and 106-112 E. 11th Street, Los Angeles, CA 90015

COMMUNITY PLAN AREA: Central City **STATUS:** ☐ Preliminary ☐ Proposed ☒ Adopted (2003)	☐ Does Conform to Plan ☒ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** Central	**CERTIFIED NEIGHBORHOOD COUNCIL:** Downtown Los Angeles

EXISTING ZONING: M2-2D	**MAX DENSITY ZONING:** 3:1	**LA River Adjacent:** No
GENERAL PLAN LAND USE: Light Industrial	**MAX. DENSITY PLAN:** 3:1	**PROPOSED PROJECT DENSITY:** 5.18:1

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	City Planner Title	(213) 978-1165 Phone

Evaluation of Environmental Impacts:

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

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Environmental Factors Potentially Affected:

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

☐ **AESTHETICS**	☐ **GREENHOUSE GAS EMISSIONS**	☐ **POPULATION AND HOUSING**
☐ **AGRICULTURE AND FOREST RESOURCES**	☒ **HAZARDS AND HAZARDOUS MATERIALS**	☒ **PUBLIC SERVICES**
☐ **AIR QUALITY**	☐ **HYDROLOGY AND WATER QUALITY**	☐ **RECREATION**
☒ **BIOLOGICAL RESOURCES**	☐ **LAND USE AND PLANNING**	☒ **TRANSPORTATION AND TRAFFIC**
☐ **CULTURAL RESOURCES**	☐ **MINERAL RESOURCES**	☐ **TRIBAL CULTURAL RESOURCES**
☐ **GEOLOGY AND SOILS**	☒ **NOISE**	☐ **UTILITIES**
		☒ **MANDATORY FINDINGS OF SIGNIFICANCE**

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

PROPONENT NAME: Frontier Holdings East, LLC, Frontier Holdings South LLC and Regal Group LLC — **PHONE NUMBER**: (213) 745-5191

APPLICANTS ADDRESSES: 888 S. Figueroa St., Suite 1900 Los Angeles, CA 90017

AGENCY REQUIRING CHECKLIST: City of Los Angeles Department of City Planning — **DATE SUBMITTED:** **February 17, 2017**

PROPOSAL NAME (If Applicable): Main Street Park & Mixed Use

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
I.	**AESTHETICS**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	☐	☐	☐	☒
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	☐	☐	☐	☒
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	☐	☐	☒	☐
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	☐	☐	☒	☐
II.	**AGRICULTURE AND FOREST RESOURCES**				
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?	☐	☐	☐	☒
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	☐	☐	☐	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	☐	☐	☐	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒
III.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD AIR QUALITY MANAGEMENT PLAN OR CONGESTION MANAGEMENT PLAN?	☐	☐	☒	☐
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	☐	☐	☒	☐
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	☐	☐	☒	☐

d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑
IV.	**BIOLOGICAL RESOURCES**				
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 ?	❑	☒	❑	❑
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?	❑	❑	❑	☒
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?	❑	❑	❑	☒
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	❑	❑	☒
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	❑	☒	❑
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?	❑	❑	❑	☒
V.	**CULTURAL RESOURCES**				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 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?	❑	❑	☒	❑
VI.	**GEOLOGY AND SOILS**				
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING: 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.	❑	❑	☒	❑

b.	STRONG SEISMIC GROUND SHAKING?	☐	☐	☒	☐
c.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	☐	☐	☒	☐
d.	LANDSLIDES?	☐	☐	☐	☒
e.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	☐	☐	☒	☐
f.	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?	☐	☐	☒	☐
g.	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?	☐	☐	☒	☐
h.	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?	☐	☐	☐	☒
VII.	**GREENHOUSE GAS EMISSIONS**				
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	☐	☐	☒	☐
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	☐	☐	☒	☐
III.	**HAZARDS AND HAZARDOUS MATERIALS**				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	☐	☐	☒	☐
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	☐	☐	☒	☐
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	☐	☐	☐	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	☐	☐	☐	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	☐	☒	☐	☐
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?				
IX.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑
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)?	❑	❑	☒	❑
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?	❑	❑	☒	❑
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?	❑	❑	☒	❑
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?	❑	❑	☒	❑
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, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	❑	❑	❑	☒
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	❑	☒
X.	**LAND USE AND PLANNING**				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	❑	☒
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?	❑	❑	☒	❑
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
XI.	**MINERAL RESOURCES**				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	☒	❑
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	☒	❑

XII.	**NOISE**				
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?	☐	☐	☒	☐
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	☐	☒	☐	☐
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☐	☒	☐	☐
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	☐	☒	☐	☐
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	☐	☐	☐	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	☐	☐	☐	☒
XIII.	**POPULATION AND HOUSING**				
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)?	☐	☐	☒	☐
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	☐	☐	☐	☒
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	☐	☐	☐	☒
XIV.	**PUBLIC SERVICES**				
a.	WOULD THE PROJECT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED GOVERNMENT FACILITIES, NEED FOR NEW OR PHYSICALLY ALTERED GOVERNMENTAL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVE FOR ANY OF THE FOLLOWING PUBLIC SERVICES:				
i.	FIRE PROTECTION?	☐	☐	☒	☐
ii.	POLICE PROTECTION?	☐	☒	☐	☐
ii.	SCHOOLS?	☐	☐	☒	☐
iii.	PARKS?	☐	☐	☒	☐
iv.	OTHER PUBLIC FACILITIES?	☐	☐	☒	☐
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?				
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?	❑	❑	☒	❑
XVI.	**TRANSPORTATION AND TRAFFIC**				
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?	❑	☒	❑	❑
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?	❑	❑	☒	❑
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?	❑	❑	❑	☒
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	❑	❑	☒
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	❑	❑	☒	❑
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?	❑	❑	☒	❑
XVII.	**TRIBAL CULTURAL RESOURCES**				
a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	❑	❑	☒	❑
ii.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	❑	❑	☒	❑
XVIII.	**UTILITIES**				
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	☒	❑
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?	❑	❑	☒	❑

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?	❑	❑	☒	❑
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	❑	☒	❑
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?	❑	❑	☒	❑
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑
XIX.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	❑	☒	❑	❑
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)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2016-3825-MND** and the associated case(s), **CPC-2016-3824-GPA-VZC-HD-MSC-SPR.** Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that **will** cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers: visit the City's website at http://www.lacity.org; City Planning- and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps – http://gmw.consrv.ca.gov/shmp/ Engineering/Infrastructure/Topographic Maps/Parcel Information – http://boemaps.eng.ci.la.ca.us/index0.1htm or City's main website under the heading "Navigate LA."

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:
Jennifer Caira	City Planner	(213) 978-1165	

APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

	Impact	Explanation	Mitigation Measures
I. AESTHETICS			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
II. AGRICULTURAL RESOURCES			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
III. AIR QUALITY			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IV. BIOLOGICAL RESOURCES			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	BIO-1
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
V. CULTURAL RESOURCES			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
VI. GEOLOGY AND SOILS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
VII. GREENHOUSE GAS EMISSIONS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	T-1, T-2
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
IX. HYDROLOGY AND WATER QUALITY			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
h.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
i.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
j.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
X. LAND USE AND PLANNING			
a.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XI. MINERAL RESOURCES			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XII. NOISE			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1
c.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-2
d.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1, N-2
e.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIII. POPULATION AND HOUSING			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIV. PUBLIC SERVICES			

	Impact	Explanation	Mitigation Measures
a.i	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.ii	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	PS-1, PS-2, PS-3
a.iii	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.iv	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.v	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XV. RECREATION			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVI. TRANSPORTATION AND TRAFFIC			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	T-1, T-2
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVII. TRIBAL CULTURAL RESOURCES			
a.i	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.ii	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XVIII. UTILITIES AND SERVICE SYSTEMS			
a.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
d.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
f.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
XIX. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	BIO-1
b.	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
c.	Less Than Significant Impact.	See expanded environmental analysis (attached).	See mitigation measures above.

SUMMARY OF MITIGATION MEASURES

AESTHETICS

No mitigation measures are required.

AGRICULTURE AND FORESTRY RESOURCES

No mitigation measures are required.

AIR QUALITY

No mitigation measures are required.

BIOLOGICAL RESOURCES

BIO-1 (Habitat Modification (Nesting Native Birds)):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
    - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
    - Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

CULTURAL RESOURCES

No mitigation measures are required.

GEOLOGY AND SOILS

No mitigation measures are required.

GREENHOUSE GAS EMISSIONS

No mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS

No mitigation measures are required.

HYDROLOGY AND WATER QUALITY

No mitigation measures are required.

LAND USE AND PLANNING

No mitigation measures are required.

MINERAL RESOURCES

No mitigation measures are required.

NOISE

N-1: Temporary Groundborne Vibration Impacts During Construction

- All new construction work shall be performed so as not to adversely impact or cause loss of support to adjacent structures. Pre-construction conditions documentation shall be performed to document conditions of the neighboring adjacent buildings prior to initiating construction activities. The documentation shall consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack

monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program shall include vertical and horizontal movement, as well as vibration thresholds. If vibration thresholds of 0.3 PPV for continuous/frequent intermittent sources, and 0.5 PPV for transient sources, are met or exceeded, work will stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

N-2: Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

POPULATION AND HOUSING

No mitigation measures are required.

PUBLIC SERVICES

PS-1 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PS-2 Public Services (Police)

- The plans shall incorporate the design features (outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design") relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

PS-3 On-Site Security

- The Property Owner shall provide private on-site security during construction and operation of the Proposed Project. The Property Owner shall contribute to the Fashion District Business Improvement District, which provides cleaning and safety services to the designated BID area.

RECREATION

No mitigation measures are required.

TRANSPORTATION AND TRAFFIC

T-1 A Construction Traffic Control Plan shall be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

T-2 All construction delivery truck loading and unloading shall take place on site or within the boundaries of an approved Construction Traffic Control Plan.

T-3 Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

TRIBAL CULTURAL RESOURCES

No mitigation measures are required.

UTILITIES AND SERVICE SYSTEMS

No mitigation measures are required.

MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

I. INTRODUCTION

PROJECT INFORMATION

Project Title: Main Street Park & Mixed Use
ENV-2016-3825-MND

Project Location: 1100-1146½ S. Main Street and 106-112 E. 11th
Los Angeles, CA 90015

Project Applicant: Frontier Holdings East, LLC, Frontier Holdings South LLC and
Regal Group LLC
888 S. Figueroa Street, Suite 1900
Los Angeles, CA 90017

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 621
Los Angeles, CA 90012

PROJECT SUMMARY

The Proposed Project includes the demolition of the existing commercial buildings on the Project Site and the construction of an 8-story mixed-use building (92 feet in height), which includes 379 apartment units and 25,810 square feet of ground floor retail/creative office space. Eleven percent of the residential dwelling units would be reserved as very low-income units (42 dwelling units). The Proposed Project would provide a total of 429 vehicle parking spaces, which includes 358 spaces for the residential uses and 71 spaces for retail and office use in accordance with the Los Angeles Municipal Code ("LAMC") requirements. Of the 71 parking spaces provided for commercial uses, 45 spaces would be provided for the Harris Building located at 110 W. 11th Street. Parking on the Project Site would be provided in three subterranean levels and on the ground floor level. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. Pursuant to the Bicycle Ordinance, the Proposed Project would provide a total of 392 long-term and 51 short-term bicycle parking spaces on-site. The Proposed Project meets the LAMC requirements for open space by providing approximately 36,650 square feet of open space and amenity areas. The Proposed Project would include 354,100 square feet of total floor area on a 68,342 square-foot site, resulting in a floor area ratio (FAR) of 5.18:1.

The Applicant is requesting the following discretionary actions: (1) Pursuant to LAMC Section 17.01, a one-lot subdivision vesting tentative tract map for 379 residential units; (2) Pursuant to LAMC Section 16.05, site plan review for a project that results in an increase of 50 or more dwelling units; (3) Pursuant

to LAMC Section 11.5.6, a General Plan amendment to the Central City Community Plan from "Light Manufacturing" to "Regional Center Commercial,"; (4) Pursuant to LAMC Section 12.32.Q, a vesting zone change and height district change from M2-2D to C2-4D, to allow for development of the site as proposed with a D limitation of 5.2:1 FAR; (5) Pursuant to LAMC Section 12.21.G(3), a Director's Decision for 10 percent reduction in open space. The Proposed Project would also require 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 (for the export of approximately 115,000 cy of soil), and removal of existing street trees (seven Canary Pine trees with diameters ranging from 9.5 inches to 20 inches) and buildings, ranging in age from 37 years to 108 years old.

ORGANIZATION OF THE INITIAL STUDY

This expanded IS/MND is organized into six sections as follows:

Initial Study Checklist: This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

Introduction: This Section provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.

Project Description: This Section provides a detailed description of the Proposed Project including the environmental setting, project characteristics, related project information, and environmental clearance requirements.

Environmental Impact Analysis: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of the Initial Study and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

References, Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

II. PROJECT DESCRIPTION
A. PROJECT LOCATION

PROJECT LOCATION

The Project Site is located in the South Markets District of Downtown Los Angeles, within the boundaries of the Central City Community Plan area. The Proposed Project is located at 1100-1146½ S. Main Street and 106-112 E. 11th Street. The Project Site is rectangular-shaped and includes approximately 68,342 square feet (1.57 acres) of lot area. As shown in Figure II-1, Project Location Map, the Project Site is generally bounded by S. Main Street to the west, E. 11th Street to the north, an alleyway to the east, and commercial buildings to the south that front S. Main Street and E. 12th Street. The addresses, Assessor's Parcel Numbers (APN), existing land uses and building information associated with the Project Site are identified below in Table II-1.

Table II-1
Summary of Parcels Associated with Project Site

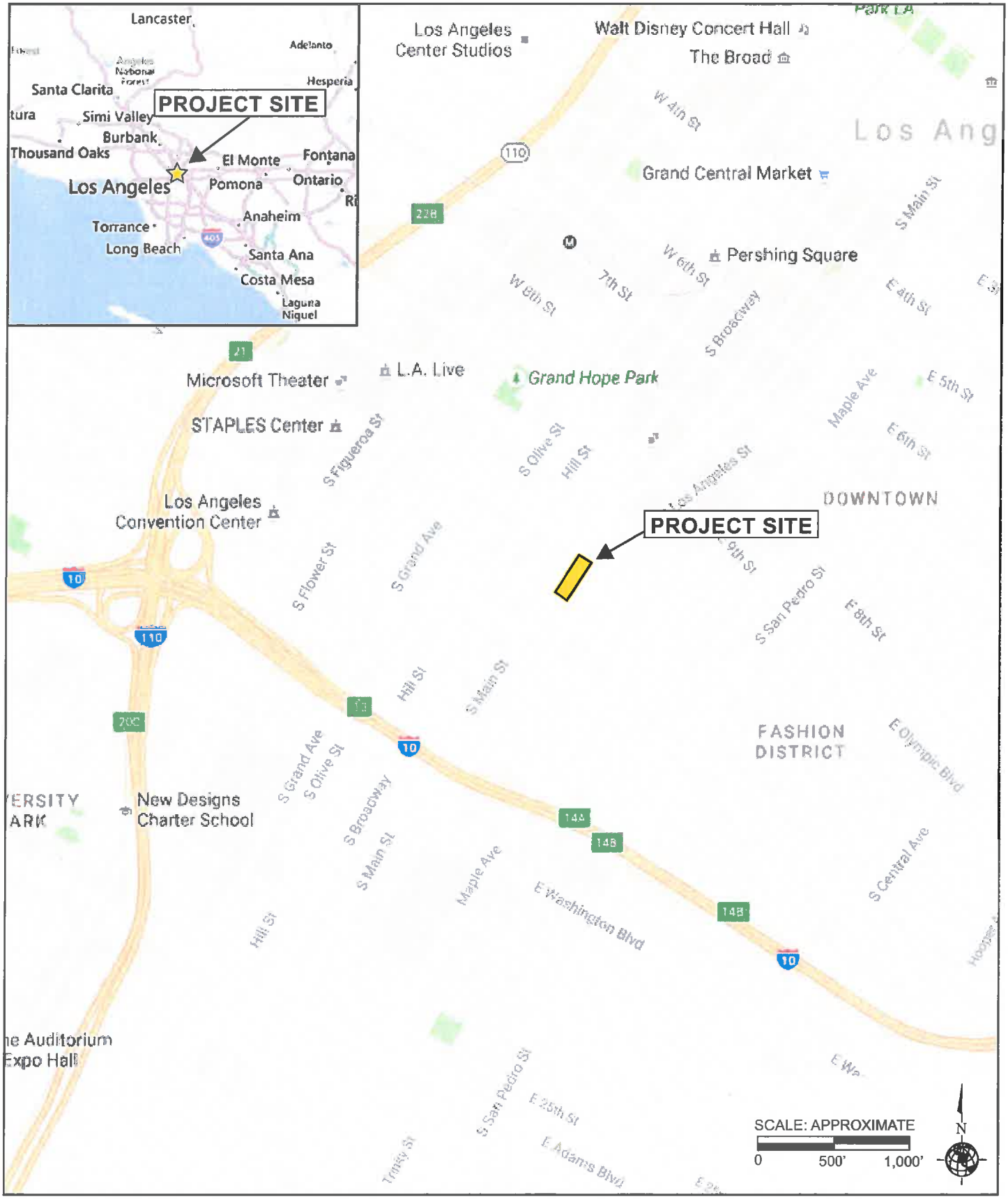
Address [a]	APN [a]	Existing Land Use [b]
1100-1104 S. Main Street 106-112 E. 11th Street	5139-016-024	1-story brick building (vacant)
1106-1110 S. Main Street	5139-016-024	
1114 S. Main Street	5139-016-023	1-story commercial brick building
1116 S. Main Street	5139-016-022	2-story commercial brick building
1118-1120 ½ S. Main Street	5139-016-022	2-story commercial brick building
1122-1124 ½ S. Main Street	5139-016-022	2-story commercial brick building
1126-1132 S. Main Street	5139-016-006	2-story commercial brick building
1140-1146 ½ S. Main Street	5139-016-007	1-story commercial block/stucco building
None	5139-016-007	

Sources:
[a] *City of Los Angeles Planning Department, ZIMAS, 2017.*
ALTA/ACSM Land Surveys: Dask Land Surveying, June 29, 2015 and JRN Civil Engineers, September 15, 2015.

Regional and Local Access

Regional access to the Project Site is provided by the Pasadena/Harbor Freeway (I-110/SR 110), located approximately 0.8 miles to the west; the Hollywood Freeway (US - 101), located approximately 1.5 miles to the north; and the Santa Monica Freeway (I-10) located approximately 0.4 miles to the south. These three freeways also provide access to the Golden State/Santa Ana Freeway (I-5) to the north, and the San Bernardino Freeway (I-10) and Pomona Freeway (SR-60) to the east and southeast, respectively.

Local street access is provided by the grid roadway system surrounding the Project Site. The City's General Plan and Mobility Plan classify street designations in the Project vicinity. S. Main Street is a north-southbound street and borders the Project Site to the west. It is a two-way street providing one to two travel lanes in each direction (depending on street parking restrictions) and is classified as a Modified



Source: Google Maps, 2016.

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Figure II-1
Project Location Map

Avenue I in the City's Mobility Plan. On-street meter parking is provided with some restrictions. E. 11th Street is a one-way westbound street and borders the Project Site to the north. It provides two travel lanes in the vicinity of the Project Site and is classified as a Modified Collector Street in the City's Mobility Plan. On-street metered parking is provided with some restrictions. S. Los Angeles Street is a north-southbound street located approximately 170 feet to the east of the Project Site. It provides two travel lanes in each direction and is classified as an Avenue II roadway in the City's Mobility Plan. E. 12th Street is a one-way eastbound street located approximately 110 feet to the south of the Project Site. It provides two lanes and is classified as a Modified Collector Street in the City's Mobility Plan.

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 and Commuter Express, Santa Monica Big Blue Bus ("BBB"), and the City of Gardena ("GTrans"). The Project Site's proximity to the Pico Rail Station, approximately one-half mile west, and the 7th Street / Metro Center Station, approximately three-quarters mile north, provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project include 2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794).[1] The LADOT Dash line (Dash Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11th Street. Due to its proximity to the aforementioned bus stops and Pico Rail Station, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

ZONING AND LAND USE DESIGNATIONS

The zoning designation for the Project Site is M2-2D (Light Industrial) and the General Plan land use designation for the Project Site is Light Industrial. Zones corresponding to the Light Industrial designation include MR2 and M2 zones. The Project Site is located in Height District No. 2, which does not specify a height restriction but limits development based on the allowable FAR. The current height designation of "2D" limits FAR on-site to 3:1.

The density, lot area, and setback requirements for the Project Site are further defined by the LAMC and the Greater Downtown Housing Incentive Area (Ordinance 179,076, effective Sept. 2007). Figure II-2, Zoning and General Plan Designations, shows the existing zonings and land use designations on the Project Site and in the surrounding area. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: the Central City Community Plan area, the City Center Redevelopment Project area, the Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Downtown Parking District, the Downtown Adaptive Reuse Incentive Area, and the Los Angeles State Enterprise Zone.

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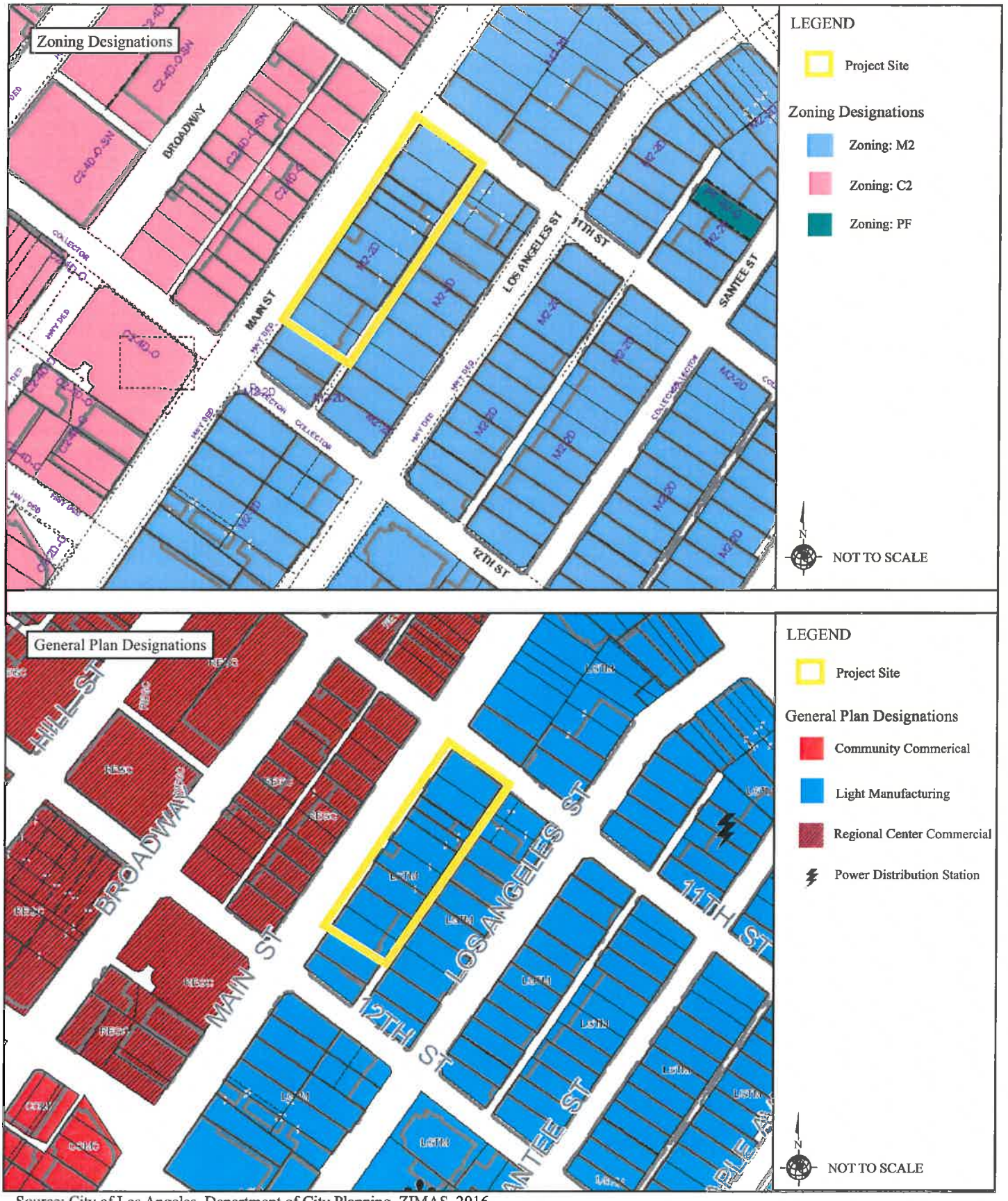
[1] *Crain & Associates, Transportation Impact Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, February 9, 2017. See Appendix H of this IS/MND.*



Source: City of Los Angeles, Department of City Planning, ZIMAS, 2016

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Figure II-2
Zoning and General Plan Land Use Designations

The Project Site is also designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[2]

Central City Community Plan

The Project Site is located within the Central City Community Plan ("Community Plan") area of the City of Los Angeles. The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. The Community Plan area contains a substantial amount of commercial development. More specifically, the Project Site is located in the South Markets area, which incorporates garment manufacturing, wholesaling and retailing. Many multi-story loft buildings with large windows and elaborately ornamented Beaux Art facades were built in the early part of this century for garment manufacturing. Street level uses are generally retail. Upper floors are used for show-rooms, offices, and garment manufacturing.[3]

City Center Redevelopment Plan

The Project Site is located within the City Center Redevelopment Project area. The City Center Redevelopment Plan, effective May 15, 2002, is valid until May 15, 2032.[4] As such, the Proposed Project would need to be submitted to the Designated Local Authority (Successor Agency to the Community Redevelopment Agency of the City of Los Angeles) for review for compliance with the City Center Redevelopment Project. The purpose of the Redevelopment Plan is to implement the Community Plan's goals for the revitalization of the Downtown Center. The Redevelopment Plan identifies overall objectives including the following: elimination of blight in the community, introduction of around-the-clock activities, creation of a Central City identity, and development of high density housing close to major employment centers.

Within the City Center Redevelopment Project Area, the Project Site is located within the City Markets Development Area. The Redevelopment Plan's objective for the City Markets Development Area is to recognize its role in providing facilities for very low-income and homeless individuals along with a mix of light industrial, wholesale and distribution uses. Rehabilitation of this area is in part dependent on addressing the social, medical and economic problems of the Central City population. A major share of

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2 *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed February 2017.*

3 *City of Los Angeles, Central City Community Plan, website: http://planning.lacity.org/complan/pdf/CCYCPTXT.PDF, accessed February 2017.*

4 *City of Los Angeles Community Redevelopment Agency – Los Angeles, City Center, website: http://www.crala.org/internet-site/Projects/City_Center/upload/citycenter.pdf, accessed February 2017.*

land use shall be devoted to encouraging industry, commerce, and the warehousing and distribution of specialized retail and wholesale goods and products.[5] The City Center Redevelopment Plan restricts development on the Project Site to an allowable FAR of 3 times the buildable area of the site.

Downtown Design Guidelines

The Downtown Design Guide ("Design Guide") encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public right-of-ways, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, and public art, and promote civic and cultural life. The design of the Proposed Project is guided by the Design Guide.

EXISTING CONDITIONS

As shown in Figure II-3, Aerial Photograph of the Project Site, and Figure II-4, Photographs of the Project Site, the Project Site is currently occupied by seven one- to two-story commercial buildings that front S. Main Street and E. 11th Street. The Project Site is entirely developed and surrounded with improved roadways and developed commercial, office, light industrial, and mixed-use properties on all sides. Pedestrian access to the on-site commercial buildings are provided along S. Main Street and E. 11th Street. The Project Site is generally pedestrian-oriented with limited vehicle parking. Vehicular access to the Project Site is provided through the adjacent alleyway on the rear sides of the commercial buildings that provides access to limited parking and staging areas associated with the commercial uses on-site. One driveway, along S. Main Street, allows for access to approximately three parking spaces.

The Project Site is complete devoid of any vegetation. However, there are seven street trees (Canary Pine) located in the public right-of-way immediately adjacent to the Project Site along S. Main Street. Topographically, the Project Site is generally flat.

[5] *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, adopted May 15, 2002, Ordinance: 174593.*

Source: Google Earth, Aerial View, 2016

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Figure II-3
Aerial Photograph of the Project Site

View 1: On the northwest corner of Main Street and 12th Street looking at the southern properties of the Project Site.

View 2: On the west side of S. Main Street looking at the northwest properties of the Project Site.

View 3: On the northwest corner of Main Street and 11th Street looking at the northwest corner of the Project Site.

View 4: On the intersection of Main Street and 11th Street looking at the northwest properties of the Project Site.

View 5: From the intersection of Main Street and 11th Street looking at the northern properties of the Project Site.

View 6: On the north side of 11th Street looking at the east side of the Project Site and the adjacent alleyway.

Source: Parker Environmental Consultants, October 11, 2016.

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Figure II-4
Photographs of the Project Site
Views 1-6

SURROUNDING LAND USES

Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of Surrounding Uses. As shown in Figure II-5, the Project Site is surrounded by commercial/retail, office, light industrial, and mixed-use properties. Properties to the north (east of Main Street), south (east of Main Street), and east of the Project Site are all zoned M2-2D with a Land Use Designation of Light Manufacturing. Properties located to the west of the Project Site (across Main Street) are generally zoned C2-4D-O with a Land Use Designation of Regional Center Commercial.

Properties to the north (east of Main Street), are zoned M2-2D with a Land Use Designation of Light Manufacturing. Between Main Street and Los Angeles Street, 11th Street is improved with two structures: (1) a one-story commercial retail/wholesale building with several vacant storefronts, retail sales, and a coffee/sandwich shop, and (2) a three-story commercial/manufacturing building.

Properties to the south of the Project Site are zoned M2-2D with a Land Use Designation of Light Manufacturing. The properties at 1150-1156 S. Main Street and 1158-1162, 111-119 E. 12th Street are one-story commercial retail buildings.

Properties to the east of the Project Site (across the alley) are zoned M2-2D with a Land Use Designation of Light Manufacturing. These properties are improved with one- to four story retail/wholesale and garment manufacturing land uses.

Properties located to the west of the Project Site (west side of Main Street) are generally zoned C2-4D-O with a Land Use Designation of Regional Center Commercial. These properties are developed with one- and two-story commercial buildings that are primarily involved with garment manufacturing, wholesaling, and retailing. The Harris building, a seven-story mid-rise mixed-use building, is located on the southwest corner of Main Street and 11th Street (See Figure II-5, View 9).

View 7: On the southwest corner of Main Street and 11th Street looking at the properties to the north of the Project Site.

View 8: On the southeast corner of Main Street and 11th Street looking at the properties to the northwest of the Project Site.

View 9: On the northeast corner of Main Street and 11th Street looking that the properties to the west of the Project Site.

View 10: On the southwest corner of Main Street and 12th Street looking at the properties to the south of the Project Site.

View 11: From the north side of 11th Street looking at the properties fronting 11th Street to the east of the Project Site.

View 12: On the northeast corner of Los Angeles Street and 11th Street looking at the properties fronting Los Angeles Street to the east of the Project Site.

Source: Parker Environmental Consultants, October 11, 2016.

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Figure II-5
Photographs of the Surrounding Land Uses
Views 7-12

PROPOSED DEVELOPMENT

The Proposed Project includes the demolition of the existing commercial buildings and the construction of a mixed-use residential building with 379 dwelling units and 25,810 square feet of ground floor retail/creative office. Eleven percent of the residential dwelling units would be reserved as very low-income units (42 units). The Proposed Project would be eight stories high, with three levels of parking below grade, ground floor commercial retail uses, and seven levels of apartments above the ground floor. The subterranean parking levels of the Proposed Project are illustrated in Figure II-6 through Figure II-8. The floor plan layout of the Proposed Project is depicted in Figure II-9 through Figure II-14.

Table II-2
Proposed Development Program

Land Uses	Units	Floor Area (Square Feet)
Residential		
Studio Units	151	328,290 [a]
1-Bedroom Units	155	
2-Bedroom Units	59	
3-Bedroom Units	14	
Subtotal	*379*	
Non-Residential		
Retail/Creative Office	--	25,810
	Total Floor Area:	**354,100** [b]
	FAR:	**5.18:1**

Notes:
[a] *Residential floor area includes common areas, interior lobby and recreational amenity areas, and interior spaces within the proposed dwelling units.*
[b] *Pursuant to the definition of the term "floor area" in LAMC Section 12.03, structured parking areas are excluded from the floor area calculations for purposes of calculating floor area ratio (FAR). The Proposed Project includes 429 parking spaces in three levels of subterranean parking and on the ground floor that is not counted towards the FAR.*
Source: MVE + Partners, October 25, 2016.

Residential Uses

As shown in Table II-2, above, the Proposed Project would include a maximum of 379 residential units within seven floors above the ground floor. The unit mix is diverse and would include 151 studio units, 155 one-bedroom units, 59 two-bedroom units, and 14 three-bedroom units of varying sizes and configurations. The building would include a residential lobby located on the ground floor. Additional residential amenity space would be located on the ground floor, second level, and roof level. Private open space would be provided as private balconies/terraces. The total residential floor area totals approximately 328,290 square feet.

Source: MVE+ Partners, October 4, 2016.

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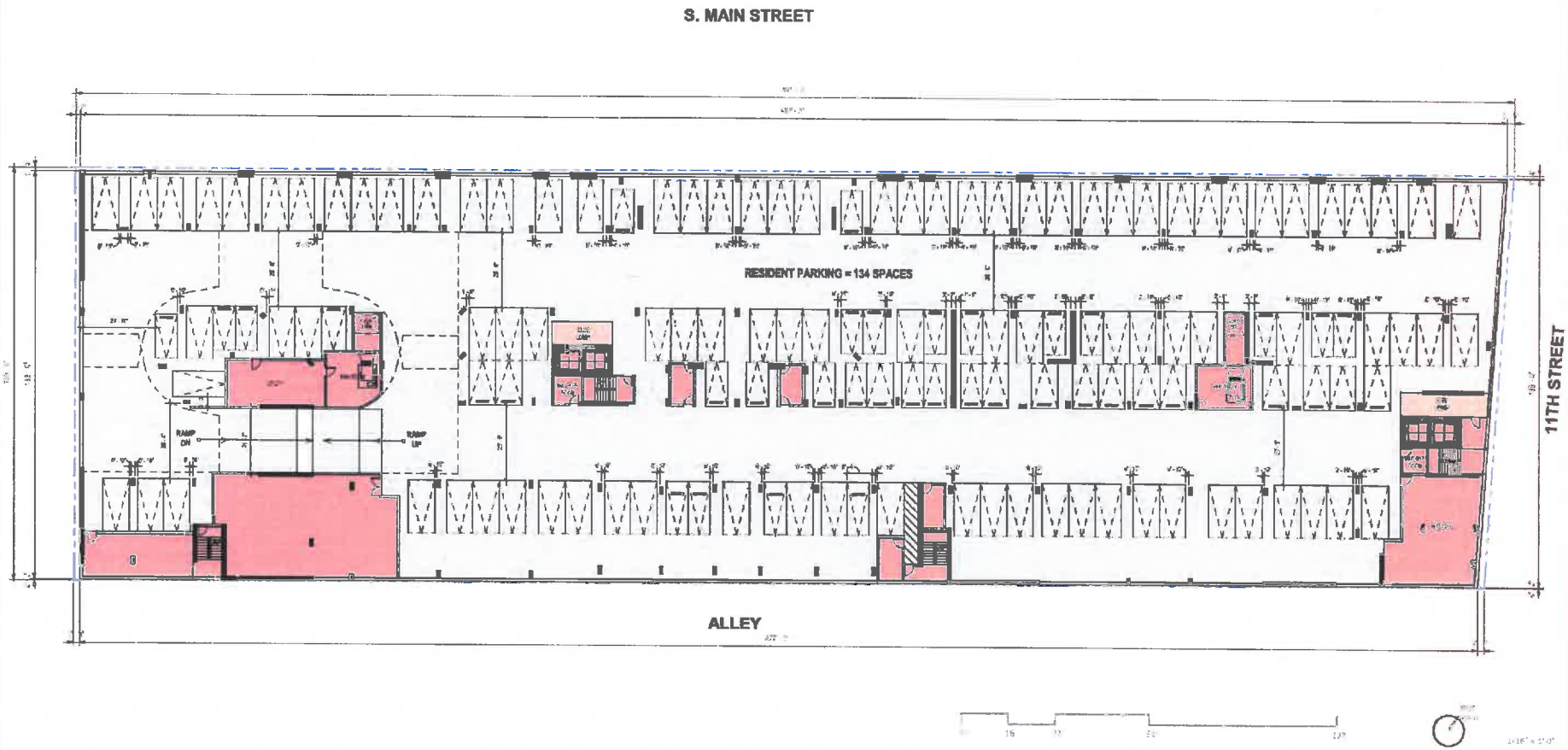
Figure II-6
Level P3 Garage Plan



Source: MVE+ Partners, October 4, 2016.

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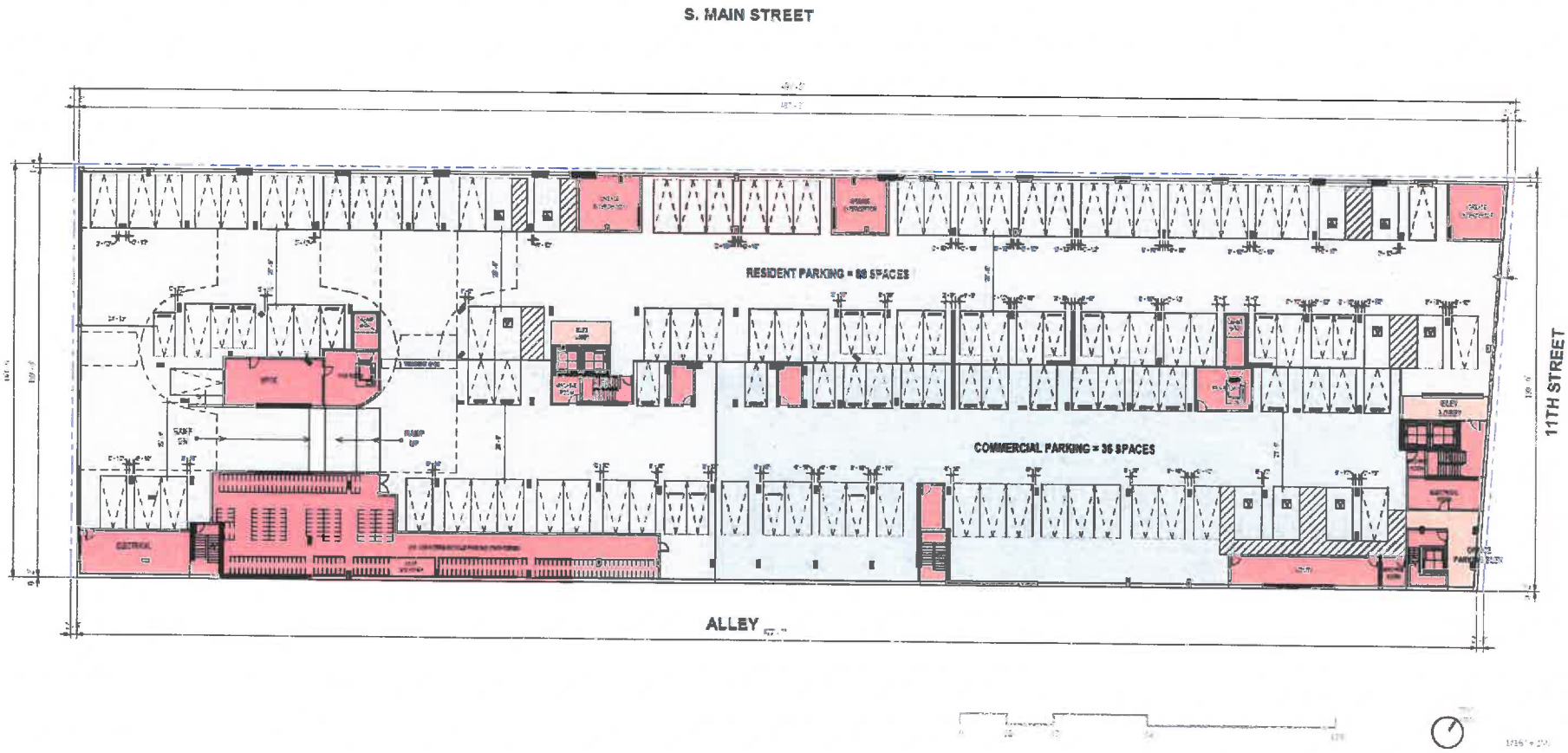
Figure II-7
Level P2 Garage Plan



Source: MVE+ Partners, December 8, 2016.

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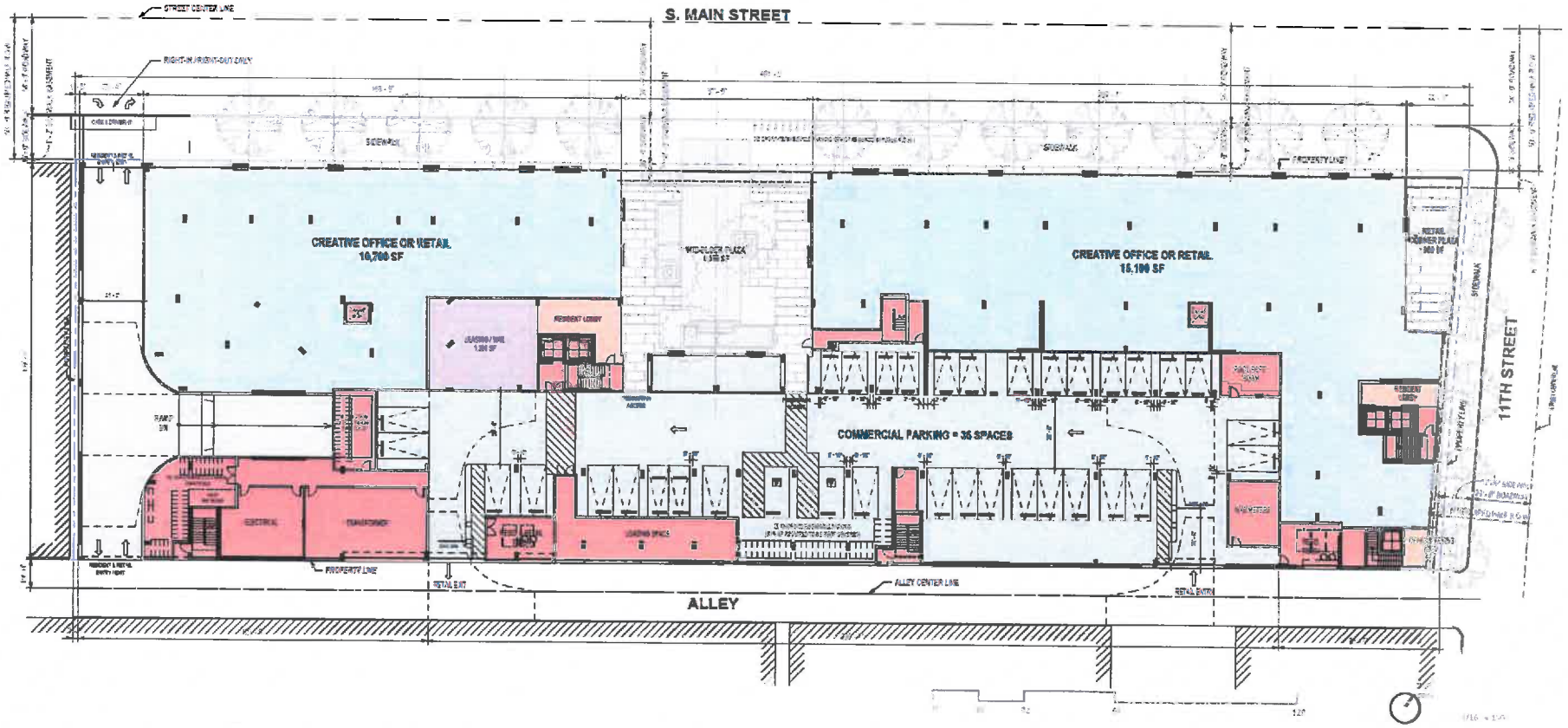
Figure II-8
Level P1 Garage Plan



Source: MVE+ Partners, December 21, 2016.

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Figure II-9
Level 1 Floor Plan

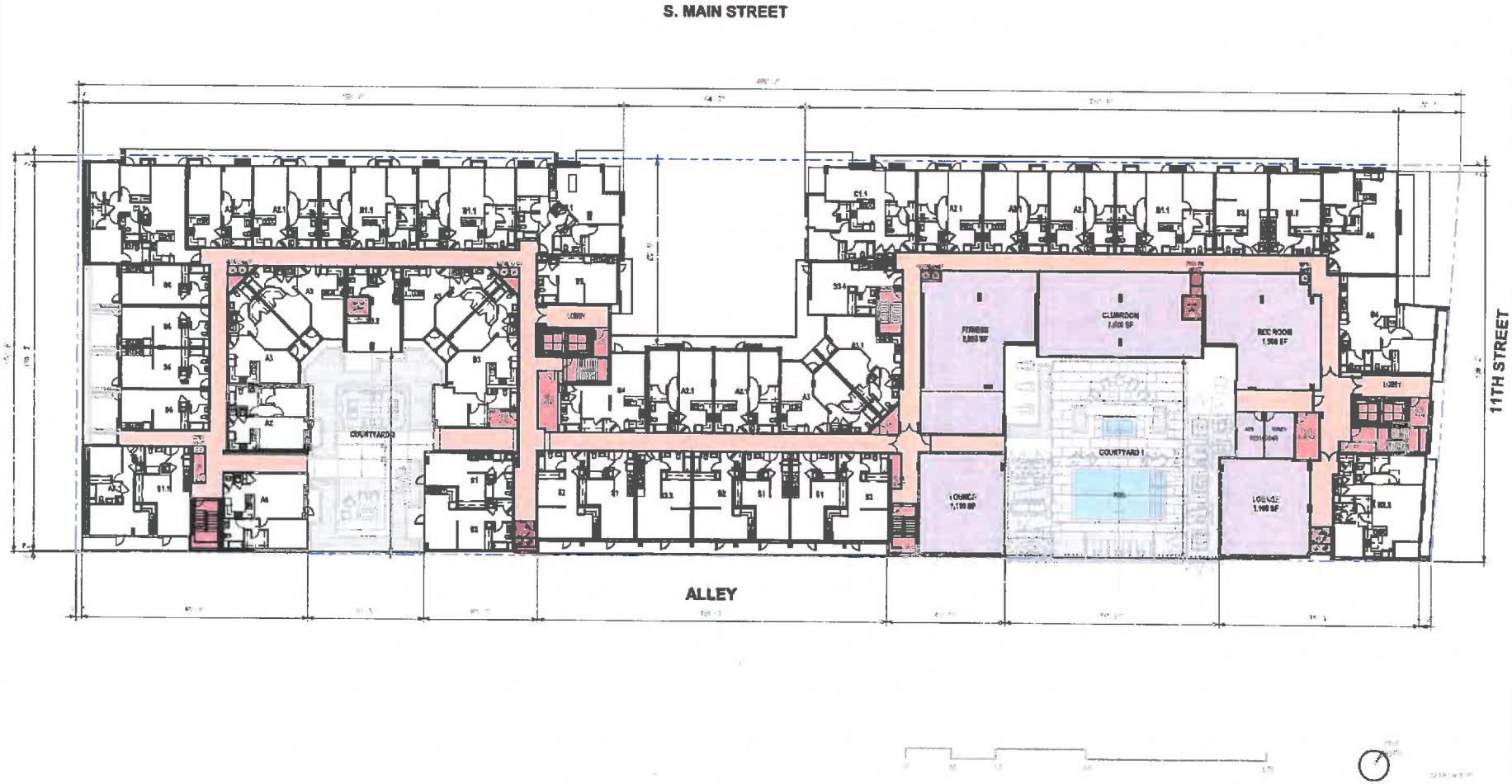

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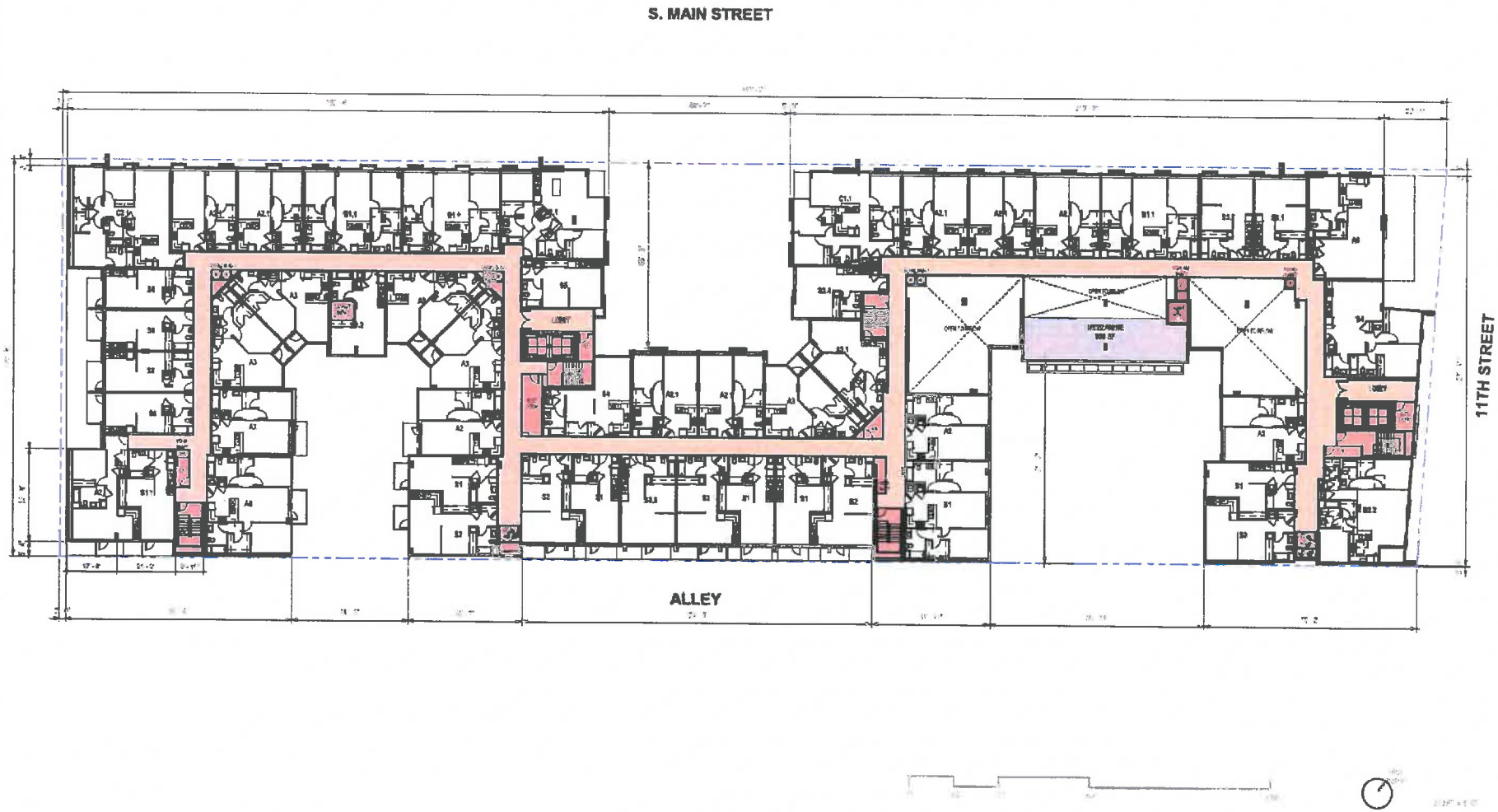
Figure II-10
Level 2 Floor Plan



Source: MVE+ Partners, October 4, 2016.

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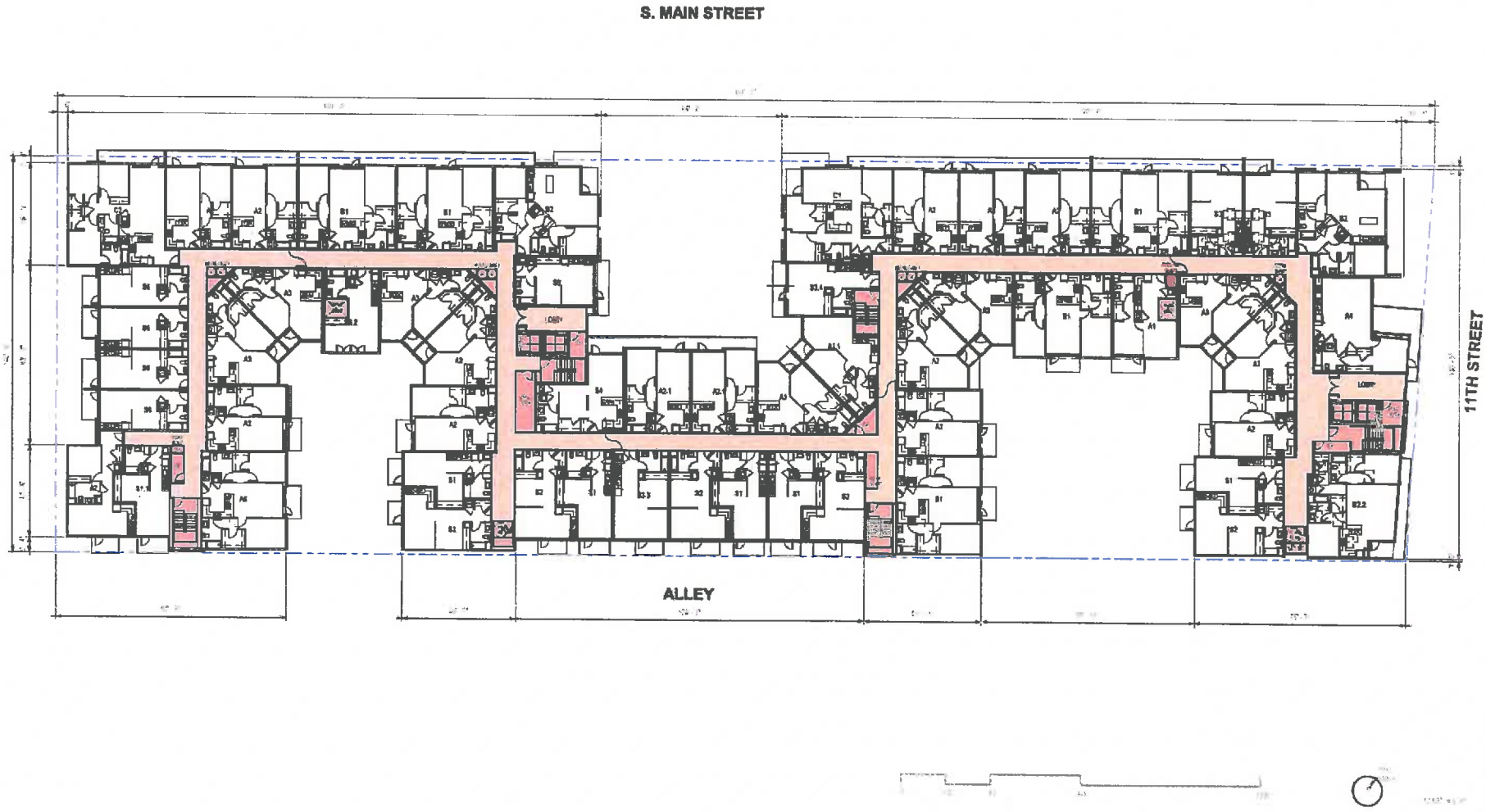
Figure II-11
Level 3 Floor Plan



Source: MVE+ Partners, October 4, 2016.

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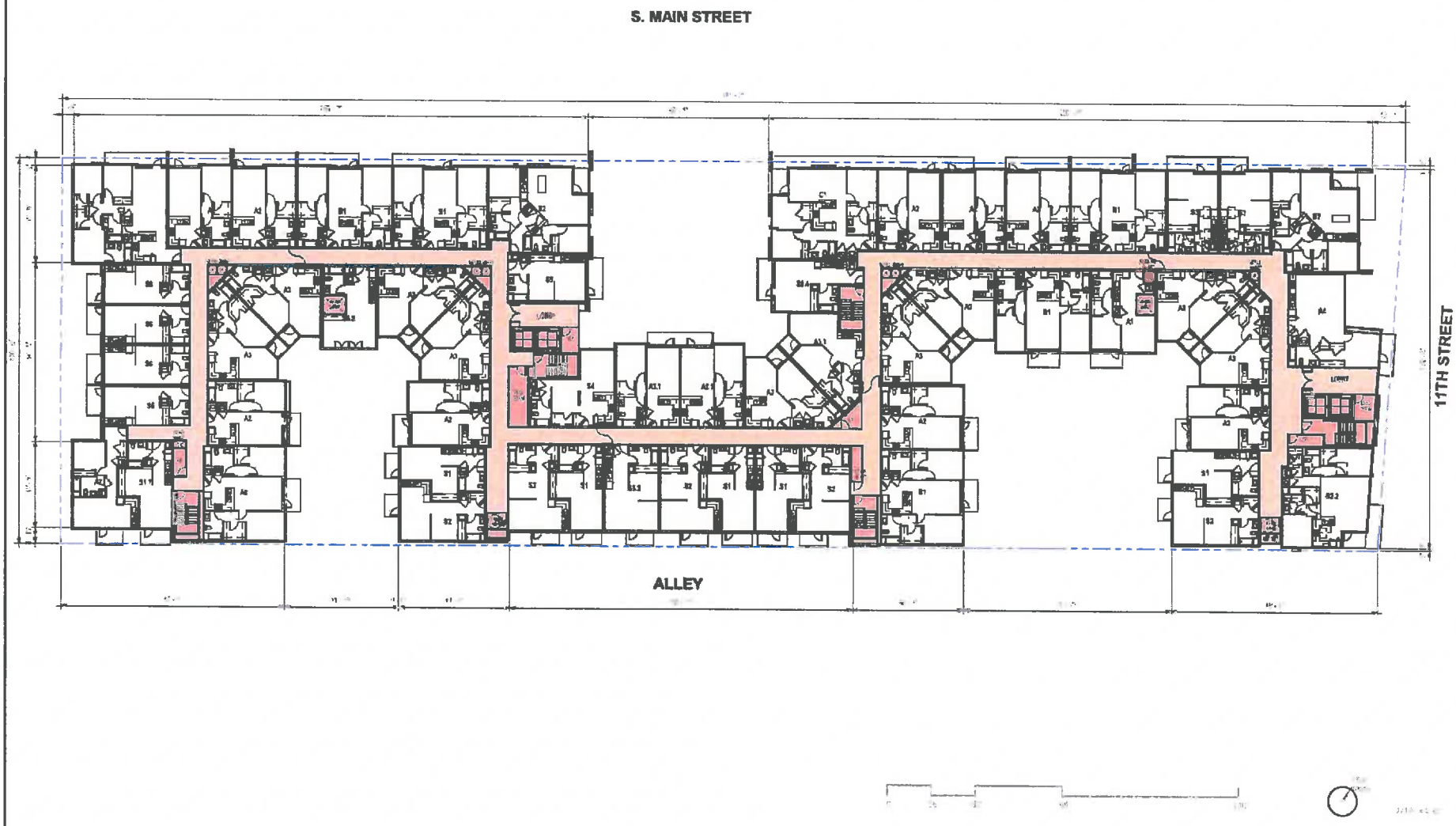
Figure II-12
Level 4 Floor Plan



Source: MVE+ Partners, October 4, 2016.

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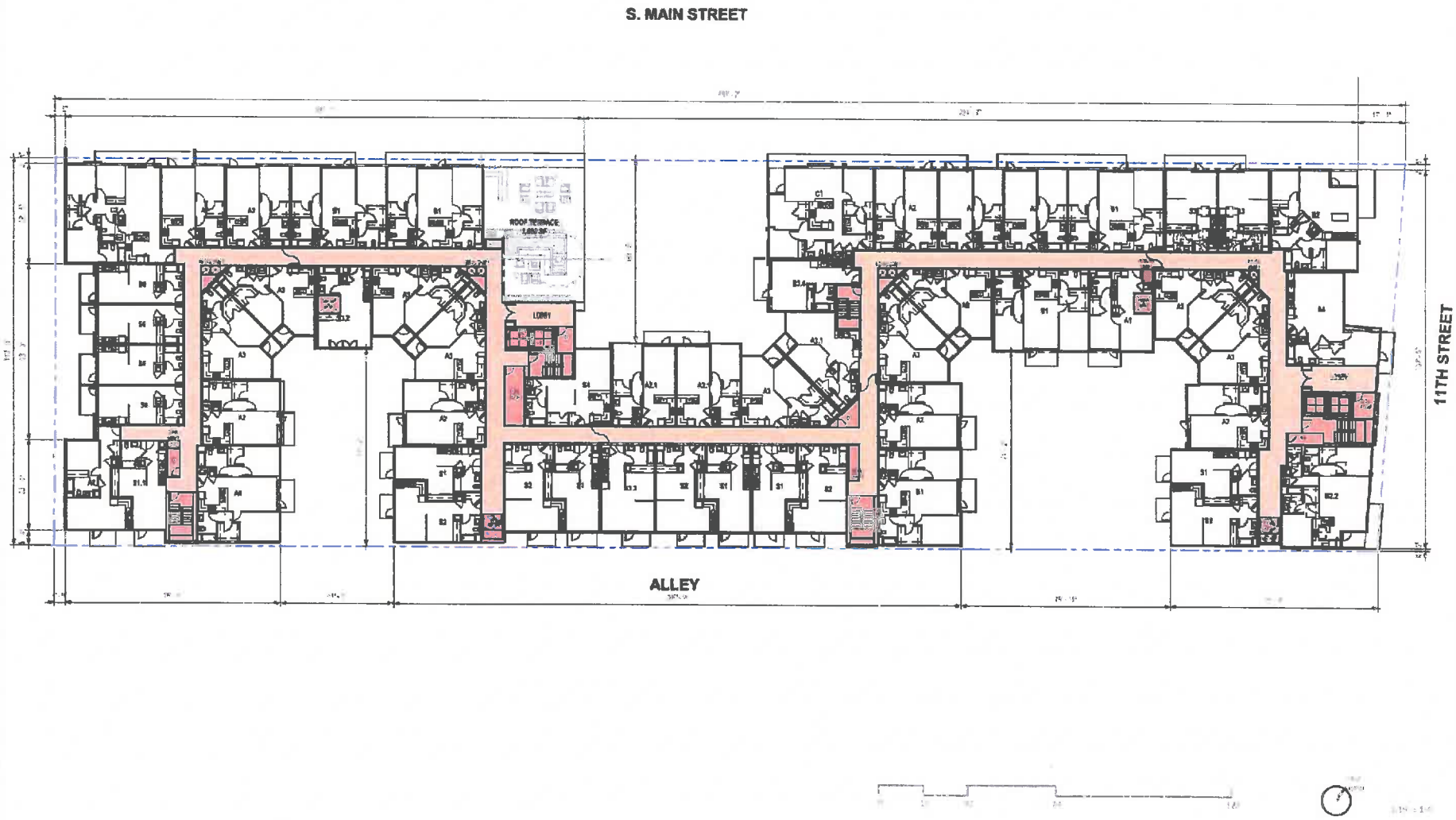
Figure II-13
Level 5 to 7 Floor Plan



Source: MVE+ Partners, October 4, 2016.

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Figure II-14
Level 8 Floor Plan

Commercial Uses

The Proposed Project includes neighborhood serving ground-floor commercial space, which would be comprised of retail and/or creative office spaces, totaling up to approximately 25,810 square feet of floor area. The commercial uses would front Main Street and 11th Street.

FLOOR AREA

The Project Site includes approximately 68,342 square feet of gross lot area (1.57 acres). Per the Community Plan and D limitation, the Project Site's M2-2D zone designation allows a 3:1 FAR. Thus, the total allowable floor area for the Project Site is 205,026 square feet. The Applicant is requesting a zone change from M2-2D to C2-4D. The proposed D limitation would restrict the development of the Project Site to a maximum FAR of 5.2:1. The Proposed Project would provide approximately 354,100 square feet of floor area for an approximate 5.18:1 FAR.

RESIDENTIAL DENSITY AND UNIT COUNT

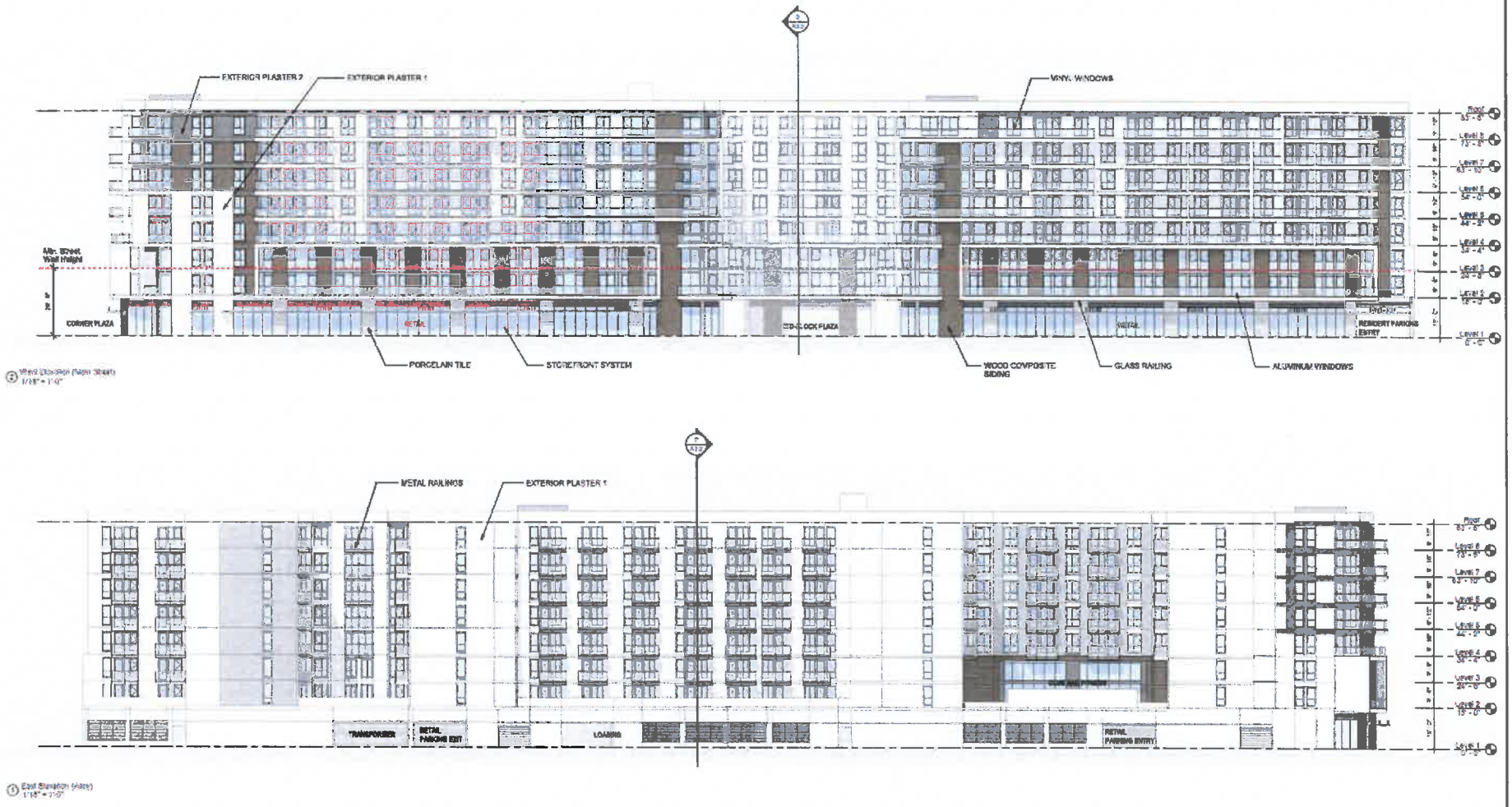
The Proposed Project would provide a maximum of 379 dwelling units of varied sizes and configurations. The average dwelling unit size is 710 square feet. Pursuant to LAMC Section 12.22 C.3, Incentives to Produce Housing in the Greater Downtown Housing Incentive Area, residential density on the Project Site is not limited per the number of units or units per square foot of lot area as is typical elsewhere in the City.

SETBACKS

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(a), no yard requirements apply for lots in the C2 Zone in the Greater Downtown Housing Incentive Area, except as required by the Downtown Design Guide. The Urban Design Standards for the Downtown area encourages variations in setbacks along street frontages. The Project Site is located on the southeast corner of Main Street and 11th Street. The Downtown Design Guidelines do not require setbacks adjacent to ground floor retail. Therefore, the Proposed Project would not be required to provide setbacks on the public right-of-way along Main Street and 11th Street.

ARCHITECTURAL FEATURES

The Proposed Project consists of an eight-story above grade building with a maximum building height of approximately 92 feet above grade. Structured parking would be concealed with parking spaces provided in a three-level subterranean parking garage and on the ground floor level. Building elevations are depicted in Figure II-15. Illustrative architectural renderings of the Proposed Project are depicted in Figure II-16.



Source: MVE+ Partners, October 4, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-15
Building Elevations

View of Proposed Project from Main Street and 11th Street.

View of Midblock Public Plaza and Retail.

Source: MVE+ Partners, October 4, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-16
Illustrative Renderings

Lighting

Lighting for the Proposed Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas, largely to provide adequate night visibility for residents and visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. The Proposed Project's lighting fixtures would be installed and operated in accordance with Section 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code, which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent.

Signage

Signage for the Proposed Project shall comply with the Los Angeles Municipal Code Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable. Additionally, the Proposed Project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions: (1) The Applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS."; (2) Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier; and (3) The Applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

Sustainability Features

The Proposed Project would incorporate the sustainability features required by the L.A. Green Code into the design and operation of the proposed building.[6] The Proposed Project would include various measures such as, but not limited to, installing Energy Star rated appliances and installation of water-conserving fixtures throughout the residential area, meet 50 percent construction waste recycling levels, and implement water-efficient landscaping. Additionally, the Proposed Project includes the redevelopment of a site in a Transit Priority Area. The Proposed Project would include bicycle parking (as required by the Bicycle Ordinance) to facilitate and encourage alternative modes of transit. The Project would provide residents and visitors with access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular emissions.

[6] *In 2010, the City adopted the 2010 CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Code ("L.A. Green Code").*

OPEN SPACE AND LANDSCAPING

As shown in Figure II-17, Overall Landscape Plan, the Proposed Project will provide a publicly accessible mid block plaza at grade level on Main Street. Two residential amenity courtyards will be located on the second level along the east elevation. The landscape plans for the ground level, second level, and rooftop terrace are provided in Figure II-18 through Figure II-20, respectively.

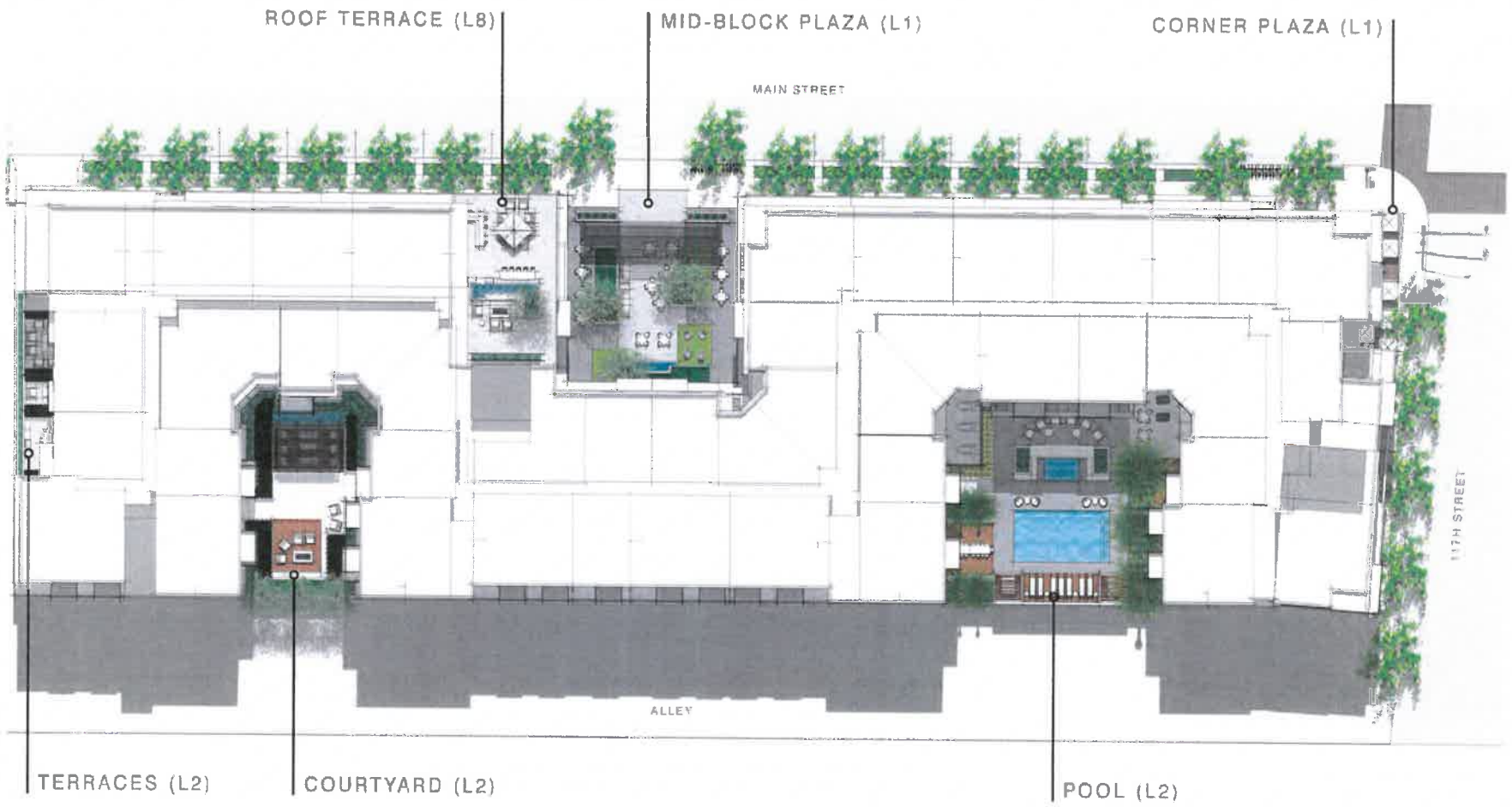
The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table II-3, Summary of Required and Proposed Open Space Areas, below. Pursuant to the LAMC, the Proposed Project would be required to provide 36,380 square feet of open space, with a 10% reduction. With approval of a 10% reduction in open space, the Project Site would provide 36,650 square feet of open space including a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, private decks, and a street plaza that would be open to the public. The Proposed Project would also provide one tree per every four residential units for a total of at least 95 trees on-site.

Table II-3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements	**Dwelling Units**	**Open Space (square feet)**
Less than 3 Habitable Rooms (100 sf/du)	306	30,600
3 Habitable Rooms (125 sf/du)	59	7,375
More than 3 Habitable Rooms (175 sf/du)	14	2,450
Total:	***379***	***40,425***
Total (with 10% reduction):	**379**	**36,380** [a]
Proposed Open Space	**Open Space (square feet)**	
Common Open Space [b]	24,300	
Private Balconies (247 x 50 sf)	12,350	
Total:	**36,650**	

Notes: du = dwelling unit; sq = square feet
[a] *Applicant is requesting a 10% reduction in open space.*
[b] *Common Open Space includes retail corner plaza, mid-block plaza, pool deck, courtyard, rooftop terrace and indoor amenities.*
Source: MVE + Partners, October 25, 2016.

To facilitate construction of the Proposed Project, the seven street trees fronting the Project Site on S. Main Street would need to be removed and replaced. Street trees would be replaced at a ratio of 2:1, for a minimum of 14 new street trees to be planted along the public right-of way fronting S. Main Street. The removal and replacement of any public trees within the public right-of way, would require review and approval by the City of Los Angeles Board of Public Works, Urban Forestry Division (See Tree Report).



Source: MVE+ Partners, October 4, 2016.

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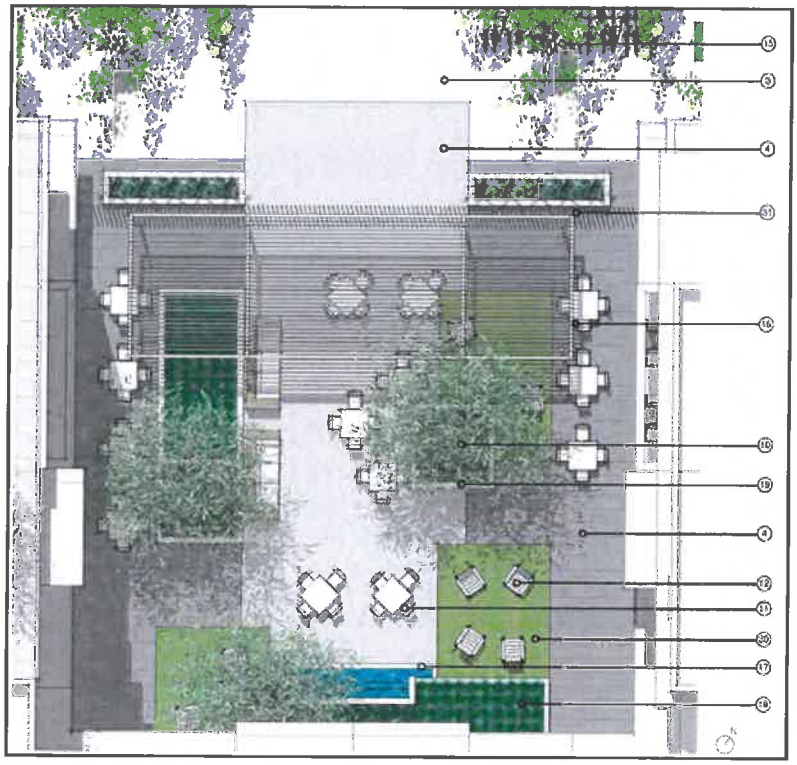
Figure II-17
Overall Landscape Plan (All Levels)

Corner Plaza



Mid-Block Plaza

LEGEND

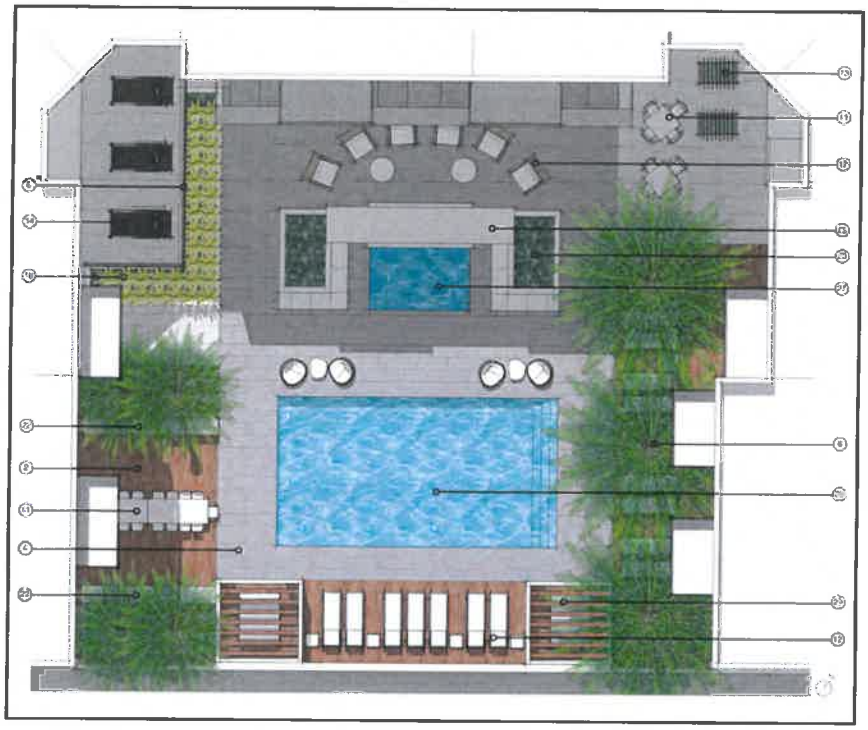
1. SPECIALTY PAVING
2. IPE WOOD PAVING
3. GRAY CONCRETE PER CITY STANDARD
4. PEDESTAL PAVERS
5. PLANTING AREA
6. DATE PALM, 25' BTH, 5' STRUCTURAL DEPRESSION
7. 5' HT IPE WOOD FENCE (DOUBLE SIDED)
8. 3' HT IPE WOOD SCREEN (DOUBLE SIDED) ON PLANTER WALL
9. 36" BOX STREET TREE
10. 60" BOX TREE
11. TABLE AND CHAIRS (BY OTHERS)
12. LOUNGE SEATING (BY OTHERS)
13. GAME TABLE (BY OTHERS)
14. OUTDOOR GYM. EQUIPMENT BY OTHERS
15. BIKE RACKS
16. 10' HT IPE WOOD AND METAL TRELLIS
17. WATER FEATURE WITH 8' HT WATER WALL, STONE VENEER
18. CAST IN PLACE CONCRETE 18" HT PLANTER
19. CAST IN PLACE CONCRETE 24" HT PLANTER
20. 24" HT CAST IN PLACE CONCRETE PLANTER WITH BUILT IN BANQUETTE
21. BUILT IN CAST IN PLACE BAR WITH STONE COUNTER
22. BUILT IN PLACE BBQ, STONE COUNTER, 2 THIS SHEET
23. PLANTING AREA
24. PORTABLE PLANTER
25. BUILT IN CAST-IN-PLACE FIREPIT
26. POOL WITH FLUSH COPING
27. SPA WITH FLUSH COPING
28. FIREPLACE WITH STONE VENEER
29. BUILT IN IPE WOOD AND METAL CABANA
30. ARTIFICIAL TURF
31. METAL FENCE AND GATES

NOTE: CAST IN PLACE CONCRETE WALLS TO HAVE ALTUS #5 RETARDER FINISH

Source: MVE+ Partners, October 4, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-18
Level 1 Enlargement - Corner Plaza and Mid-Block Plaza



Pool

Courtyard

LEGEND

1. SPECIALTY PAVING
2. IPE WOOD PAVING
3. GRAY CONCRETE PER CITY STANDARD
4. PEDESTAL PAVERS
5. PLANTING AREA
6. DATE PALM, 25' BTH, 5' STRUCTURAL DEPRESSION
7. 5' HT IPE WOOD FENCE (DOUBLE SIDED)
8. 3' HT IPE WOOD SCREEN (DOUBLE SIDED) ON PLANTER WALL
9. 36" BOX STREET TREE
10. 60" BOX TREE
11. TABLE AND CHAIRS (BY OTHERS)
12. LOUNGE SEATING (BY OTHERS)
13. GAME TABLE (BY OTHERS)
14. OUTDOOR GYM, EQUIPMENT BY OTHERS
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20. 24" HT CAST IN PLACE CONCRETE PLANTER WITH BUILT IN BANQUETTE
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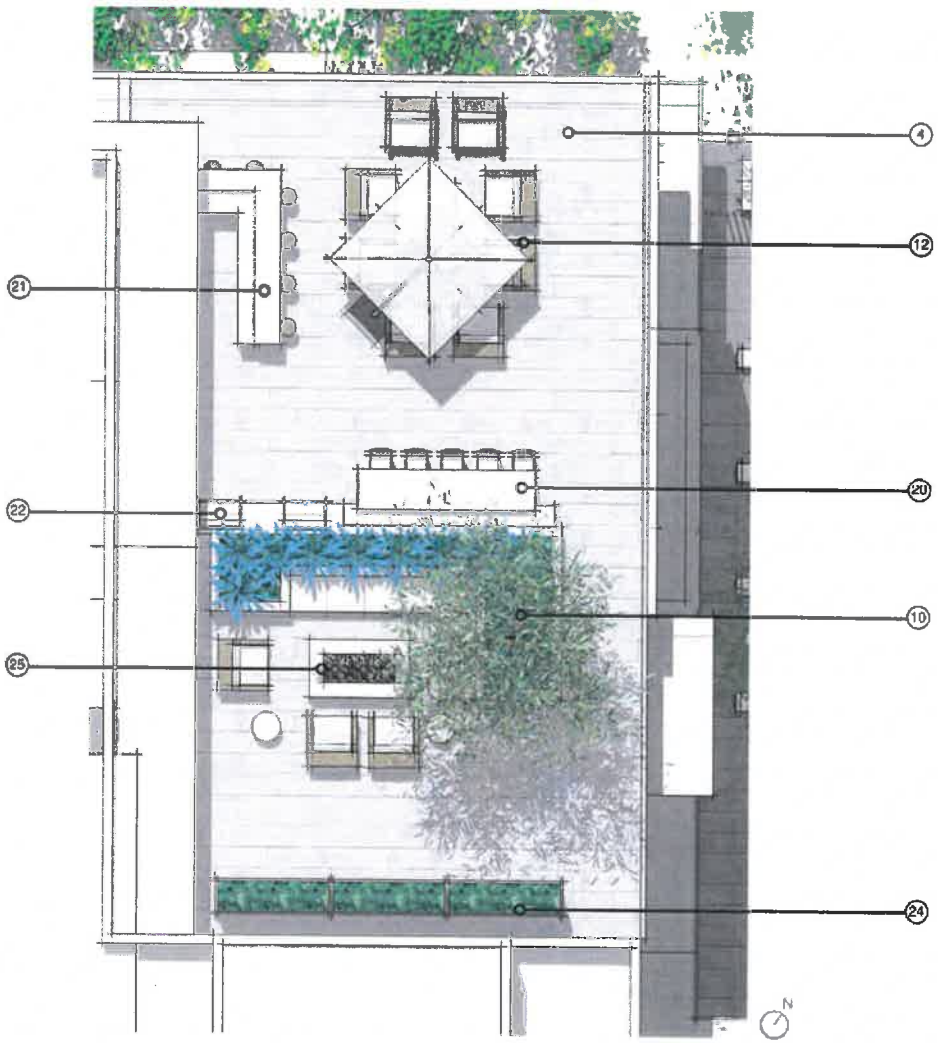
22. BUILT IN PLACE BBQ, STONE COUNTER, 2 THIS SHEET
23. PLANTING AREA
24. PORTABLE PLANTER
25. BUILT IN CAST-IN-PLACE FIREPIT
26. POOL WITH FLUSH COPING
27. SPA WITH FLUSH COPING
28. FIREPLACE WITH STONE VENEER
29. BUILT IN IPE WOOD AND METAL CABANA
30. ARTIFICIAL TURF
31. METAL FENCE AND GATES

NOTE: CAST IN PLACE CONCRETE WALLS TO HAVE ALTUS #5 RETARDER FINISH

Source: MVE+ Partners, October 4, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure II-19
Level 2 Enlargement - Pool and Courtyard



LEGEND

1. SPECIALTY PAVING
2. IPE WOOD PAVING
3. GRAY CONCRETE PER CITY STANDARD
4. PEDESTAL PAVERS
5. PLANTING AREA
6. DATE PALM, 25' BTH, 5' STRUCTURAL DEPRESSION
7. 5' HT IPE WOOD FENCE (DOUBLE SIDED)
8. 3' HT IPE WOOD SCREEN (DOUBLE SIDED) ON PLANTER WALL
9. 36" BOX STREET TREE
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11. TABLE AND CHAIRS (BY OTHERS)
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20. 24" HT CAST IN PLACE CONCRETE PLANTER WITH BUILT IN BANQUETTE
21. BUILT IN CAST IN PLACE BAR WITH STONE COUNTER
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23. PLANTING AREA
24. PORTABLE PLANTER
25. BUILT IN CAST-IN-PLACE FIREPIT
26. POOL WITH FLUSH COPING
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28. FIREPLACE WITH STONE VENEER
29. BUILT IN IPE WOOD AND METAL CABANA
30. ARTIFICIAL TURF
31. METAL FENCE AND GATES

NOTE: CAST IN PLACE CONCRETE WALLS TO HAVE ALTUS #5 RETARDER FINISH

Source: MVE+ Partners, October 4, 2016.

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Figure II-20
Level 8 Enlargement - Roof Terrace

PARKING AND ACCESS

The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1.25) parking spaces for each dwelling unit of more than three (3) habitable rooms.

As summarized in Table II-4, the Proposed Project would be consistent with the applicable parking requirements of the LAMC. Pursuant to the parking requirements under the LAMC, the Proposed Project's residential component would require a total of 358 residential parking spaces. LAMC Section 12.21A.4, allows for 156 bicycle parking spaces to be provided to replace 39 parking spaces. The Proposed Project would provide a total of 429 vehicle parking spaces, which includes 358 spaces for the residential uses and 71 spaces for retail and office uses. The Proposed Project would require 26 spaces for the commercial component. The Proposed Project would provide 45 parking spaces, in service to the Harris Building located at 110 W. 11th Street, which is a historic building with insufficient parking.

Table II-4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required [a, b]		Parking Provided
		Rate	Spaces	
Residential				
Units with 3 or less Habitable Rooms	306 du	1 space / du	306	**358 spaces**
Units with more than 3 Habitable Rooms	73 du	1.25 space / du	91	
10% Reduction [c]	--	-10%	-39	
Subtotal Residential	**379 du**		**358**	
Commercial				
Retail/Office (On-Site Uses)	25,810 sf	1 space / 1000 sf	26	26 spaces
Harris Building (Off Site-Use)	--	--	--	45 spaces
Subtotal Commercial	**25,810 sf**		**26**	**71**
		TOTAL	**384**	**429**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21 A.4.(p)(1). Exception for Central City Area. 1 space per du, except 1.25 spaces per du for residential units of more than 3 habitable rooms where there are more than 6 units of more than 3 habitable rooms.*
[b] *LAMC 12.21 A.4.(i)(3). Exception Downtown Business District. One space for each 1,000 square of floor area in business, commercial or industrial buildings of 7,500 square feet or more.*
[c] *Per LAMC Section 12.21 A.4, 156 bicycle parking spaces will be provided to replace 39 parking spaces.*
Source: MVE + Partners, October 25, 2016.

Parking for the proposed retail, office, and residential uses would be provided in the three levels of subterranean parking beneath the building and on the ground floor. The residential parking spaces would be located on Levels P-1 through P-3 located below grade. Commercial parking would be provided on the ground floor and in Level P-1. Primary vehicular access for residential and commercial uses would

be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. See Figure II-6 through Figure II-9.

As summarized in Table II-5, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC for bicycle parking spaces. As required, the Proposed Project would propose a total of 443 bicycle spaces, which includes: 392 long-terms spaces and 51 short-term spaces.

Table II-5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Required [a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Residential		**(1 per 10 DUs)**	**(1 per DU)**		
Dwelling Units	379 du	38	379	417	417
Commercial		**(1 per 2,000 sf)**	**(1 per 2,000 sf)**		
Retail	25,810 sf	13	13	26	26
	TOTAL	**51**	**392**	**443**	**443**

Notes:
du = dwelling unit, sf = square feet
[a] LAMC 12.21 A.16. Bicycle Parking and Shower Facilities.
Source: MVE + Partners, October 25, 2016.

CONSTRUCTION

Construction Schedule/Phasing

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2021. Construction activities associated with the Proposed Project would be undertaken in the following sequential stages: (1) demolition/site clearing, (2) excavation, grading and foundations, (3) building construction, and (4) architectural finishing.

Demolition/Site Clearing Phase

This phase would include the demolition of the existing commercial buildings with a total building area of approximately 67,820 square feet. In addition, this phase may include the removal of street trees, walls, fences, and associated debris. The demolition/site clearing would be completed in approximately 1 month.

Excavation, Grading and Foundation Phase

After the completion of demolition/site clearing, the excavation phase for the Proposed Project would occur for approximately 4 months and would involve the cut and fill of land to ensure the proper base and slope for the building foundations. Preparation of the proposed building footings and structural foundation would require the excavation and export of up to 115,000 cy of soil to be hauled off-site in order to build the three

level subterranean parking garage. Haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety.

Building Construction Phase

The building construction phase consists of construction of the building foundations, basement walls, parking structure and residential/retail structures. This phase is expected to occur for approximately 15 months.

Architectural Coatings

Upon completion of the structures, architectural coating and finishing would occur. The architectural finishing phase would involve installation of windows, doors, cabinetry, appliances, and would also involve the application of interior and exterior paint and finish-coating materials. It is estimated that architectural coatings would occur over the final 4 months of the construction phase.

Temporary Right-of-Way Encroachment

Construction activities would necessitate temporary lane closures on Main and/or 11th Street adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in Section XVI, Transportation and Traffic (See Mitigation Measure T-1), a detailed Construction Traffic Control Plan shall be submitted to LADOT review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on Main Street and 11th Street fronting the Project Site will be maintained and protected from the active construction site. Temporary detours would be coordinate with the City on an as needed basis.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. The Project Site is surrounded by commercial/retail, office, light industrial, and mixed-use residential properties. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible, but demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon or Chiquita Canyon landfills, which accepts construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 29 miles north of the Project Site (approx. 58 miles round trip). The Chiquita Canyon Landfill is approximately 41 miles to the north of the Project Site (approx. 82 miles round trip). For recycling efforts, the Waste Management Downtown Diversion center accepts construction waste for recycling and is located approximately 3 miles from the Project Site (approx. 6 miles round trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 20 cubic yard hauling capacity (i.e., 30 tons maximum gross weight). All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The local haul route exiting the Project Site would utilize Main Street, which is designated as a Modified Avenue I in the City's Mobility Plan, to travel southbound to the I-10 Freeway, utilizing 17th Street westbound to the Grand Ave./Hope Street freeway onramp. The local haul route entering the Project Site would utilize the Los Angeles Street exit from the I-10 Freeway, then travel northbound on Main Street. The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B.) The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Proposed Project, were identified for evaluation. The related projects identified are included in Table II-6, Related Projects List, below. A total of 108 related projects were identified within the affected Project area. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section III of this IS/MND. The locations of the related projects are shown in Figure II-21, Related Projects Location Map.

Table II-6
Related Projects List

#	Project Name	Location/Address	Project Description	Number	Units
1	Los Angeles Trade-Technical College	400 W. Washington Boulevard	Total Project Site (21,300 students)	682,344	sf
2	8th and Figueroa Mixed-Use Project	744 S. Figueroa Street	Apartment Retail	436 10,156	du sf
3	Ava Little Tokyo	200 S. Los Angeles Street	Condominium Apartment Retail	570 280 50,000	du du sf
4	TenTen Wilshire Expansion (The Icon)	1027 W. Wilshire Boulevard	Condominium Retail	402 4,728	du sf
5	Vibiana Lofts Mixed-Use Project	225 S. Los Angeles Street	Condominium Retail	300 3,400	du sf
6	Northeast Tower Mixed-Use	215 W. 9th Street	Condominium Retail	210 9,000	du sf
7	Amacon Project	1133 S. Hope Street	Apartment Retail	208 5,029	du sf
8	Garey Building Project	905 E. 2nd Street	Condominium Retail	320 18,716	du sf
9	Olympic Tower Mixed-Use Project	815 W. Olympic Boulevard	Hotel Retail Office	346 61,149 36,256	room sf sf
10	5th and Olive Project	437 S. Hill Street	Apartment Quality Restaurant	660 12,500	du sf
11	11th and Hill Project	1115 S. Hill Street	Condominium Restaurant	172 6,850	du sf
12	Stanford Regency Plaza	810 E. Pico Boulevard	Wholesale Market	181,620	sf
13	Bixel and Lucas Project	1102 W. 6th Street	Apartment Retail	648 39,996	du sf
14	Figueroa & Adams Student Housing Project	2455 S. Figueroa Street	Student Apartment	145	du
15	8th/Hope/Grand Project	609 W. 8th Street	Condominium Hotel Retail Restaurant	225 200 30,000 32,000	du room sf sf
16	City Center West Apartment Project	1150 W. Wilshire Boulevard	Apartment Quality Restaurant	80 4,589	du sf
17	Glass Tower Project	1050 S. Grand Avenue	Condominium Retail Restaurant	151 3,472 2,200	du sf sf
18	Embassy Tower	848 S. Grand Avenue	High-Rise Condominium Supermarket	420 38,500	du sf
19	Zen Mixed-Use Project	250 S. Hill Street	Condominium Retail	330 12,000	du sf
20	Oak Village Residences Project	902 W. Washington Boulevard	Condominium	142	du
21	--	243 W. Adams Boulevard	Apartment Retail Restaurant	300 2,500 2,500	du sf sf
22	Wilshire Grand Redevelopment Project	900 W. Wilshire Boulevard	Condominium Hotel Fitness Facility General Office Retail/Restaurant Meeting Room and Ballroom	100 560 20,000 1,500 50,000 55,000	du room sf sf sf sf

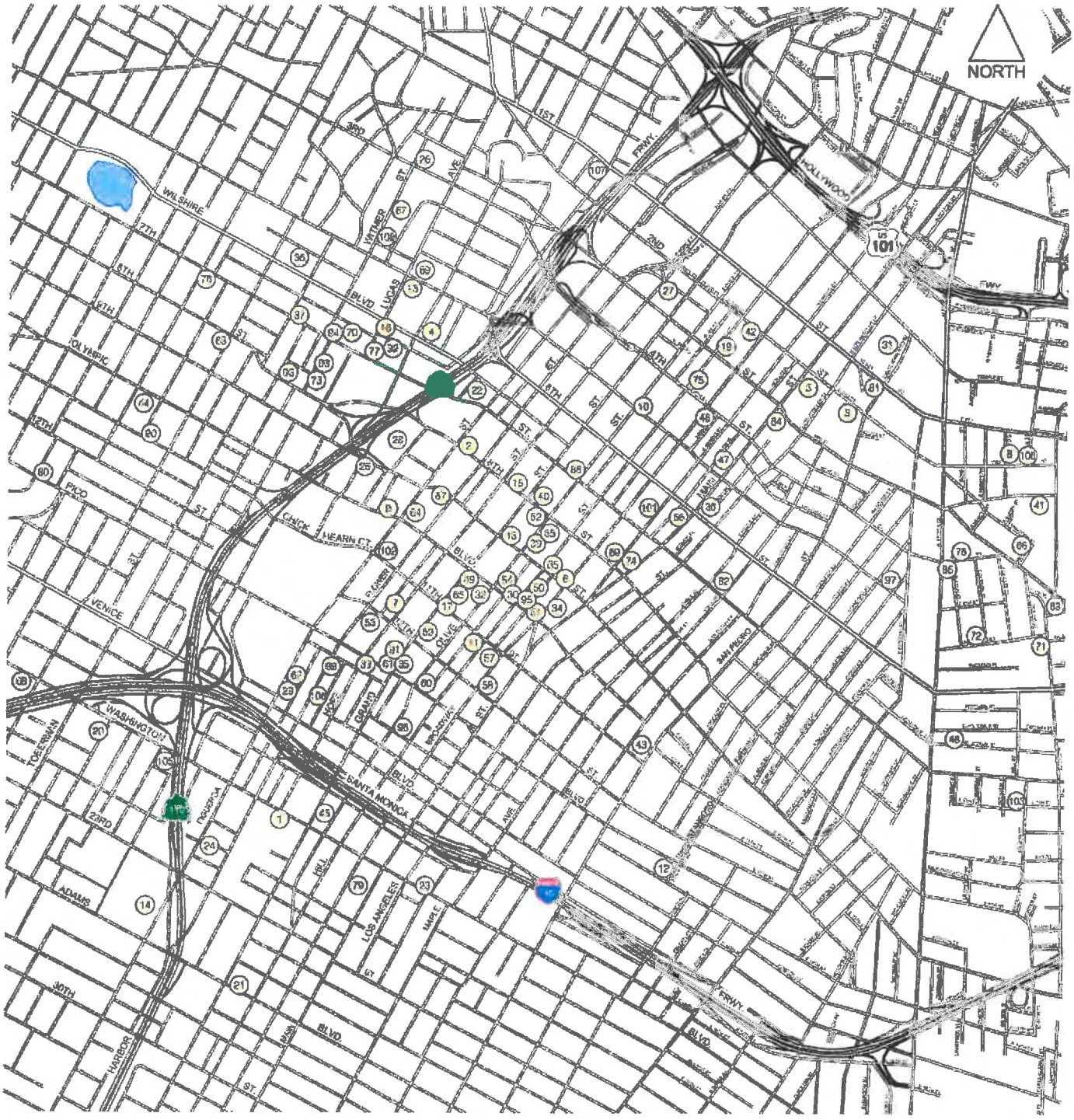
#	Project Name	Location/Address	Project Description	Number	Units
			Ancillary Hotel, Residential, and Office Areas	150,000	sf
23	Washington Boulevard Opportunity – Mercy Housing	220 E. Washington Boulevard	Apartment Retail Restaurant	357 7,750 7,750	du sf sf
24	--	2100 S. Figueroa Street	Condominium Retail	291 7,134	du sf
25	--	926 W. James M. Wood Boulevard	Hotel	225	room
26	--	1435 W. 3rd Street	Apartment Retail	122 5,000	du sf
27	Grand Avenue Project	237 S. Grand Avenue	Condominium Apartment Retail General Office	1,648 412 449,000 681,000	du du sf sf
28	Metropolis Mixed-Use Project	899 S. Francisco Street	Office Hotel All-Suites Hotel Business Hotel Retail/Restaurant	495,164 900 388 388 50,866	sf room room room sf
29	1500 S. Figueroa Mixed-Use Project	1500 S. Figueroa Street	Apartment Retail	190 10,922	du sf
30	Olympic and Hill Mixed-Use Project	301 W. Olympic Boulevard	Apartment Retail Restaurant	300 14,500 8,500	du sf sf
31	Los Angeles Street Civic Building Project	150 N. Los Angeles Street	Office Retail Child Care	712,500 35,000 2,500	sf sf sf
32	1001 Olive Street Project	1001 S. Olive Street	Apartment Restaurant	225 5,000	du sf
33	Onyx Mixed-Use Project	1300 S. Hope Street	Apartment Retail	419 42,200	du sf
34	Olympic and Broadway Mixed-Use Project	928 S. Broadway	Apartment Live/Work Retail Commercial Live/Work	667 17 47,600 11,100	du du sf sf
35	G12 Mixed-Use Project	1200 S. Grand Avenue	Apartment Retail	640 45,000	du sf
36	Valencia Mixed-Use Project	1501 W. Wilshire Boulevard	Apartment Retail Restaurant	217 2,400 4,450	du sf sf
37	--	1329 W. 7th Street	Apartment Retail	94 2,000	du sf
38	Topaz Mixed-Use Project	534 S. Main Street	Apartment Retail Quality Restaurant Fast-Food Restaurant w/o Drive Through	160 18,000 3,500 3,500	du sf sf sf
39	--	840 S. Olive Street	Condominium Restaurant	303 9,680	du sf
40	--	710 S. Grand Avenue	Apartment Retail Restaurant	700 27,000 5,000	du sf sf
41	Santa Fe Freight Yard Redevelopment	950 E. 3rd Street	Sci Arc School Retail Apartment	532 30,062 635	stu sf du
42	--	201 S. Broadway	Retail/Restaurant	27,765	sf

#	Project Name	Location/Address	Project Description	Number	Units
43	The City Market Mixed-Use Project	1057 S. San Pedro Street	Multi-Family Residential Hotel Office Retail Cinema	945 210 294,641 224,862 744	du room sf sf seat
44	--	1700 W. Olympic Boulevard	Hotel	160	room
45	Grand Metropolitan Mixed-Use Project	233 W. Washington Boulevard	Apartment Retail	160 24,000	room sf
46	400 S. Broadway Mixed-Use Project	400 S. Broadway	Apartment Retail	450 7,500	du sf
47	--	433 S. Main Street	Condominium Mixed Commercial	161 6,900	du sf
48	Camden Arts Mixed-Use Project	1525 E. Industrial Street	Apartment Office Retail Restaurant	328 27,300 6,400 5,700	du sf sf sf
49	--	1000 S. Grand Avenue	Apartment Restaurant	274 12,000	du sf
50	Hill Street Mixed-Use Project	920 S. Hill Street	Apartment Retail	239 5,400	du sf
51	Broadway Mixed-Use Project	955 S. Broadway	Apartment Retail	201 6,000	du sf
52	--	801 S. Olive Street	Apartment Restaurant	331 10,000	du sf
53	Flower (1212) Mixed-Use Project	1212 S. Flower Street	Condominium Retail/Restaurant Office	730 10,500 70,465	du sf sf
54	Olympic and Olive Mixed-Use Project	960 S. Olive Street	Apartment Restaurant	263 14,500	du sf
55	--	820 S. Olive Street	Apartment Retail	589 4,500	du sf
56	SB Omega Mixed-Use Project	601 S. Main Street	Condominium Retail	452 25,000	du sf
57	Herald Examiner Mixed-Use Project	1111 S. Broadway	Apartment Office Retail	391 39,725 49,000	du sf sf
58	--	1148 S. Broadway	Apartment Retail	94 2,500	du sf
59	DTLA South Park Site 1	1120 S. Grand Avenue	High-Rise Apartment Shopping Center	666 20,690	du sf
60	DTLA South Park Site 4	1230 S. Olive Street	Apartment Retail	362 4,000	du sf
61	--	1247 S. Grand Avenue	Apartment Retail	118 5,125	du sf
62	1400 S. Figueroa Street Project	1400 S. Figueroa Street	Apartment Retail/Restaurant	106 4,834	du sf
63	Legal Aid Foundation of Los Angeles Project	1550 W. 8th Street	Office	34,000	sf
64	Variety Arts Mixed-Use Project	940 S. Figueroa Street	Theater Office Restaurant Bar	1,942 3,295 10,056 5,119	seat sf sf sf
65	--	1036 S. Grand Avenue	Restaurant	7,149	sf
66	Fourth and Traction Project	963 E. 4th Street	Office Retail Restaurant	78,600 25,000 20,000	sf sf sf
67	--	459 S. Hartford Avenue	Affordable Apartments	101	du

#	Project Name	Location/Address	Project Description	Number	Units
68	--	1122 W. Washington Boulevard	Medical Office	60,000	sf
69	--	737 S. Spring Street	Apartment Pharmacy	320 25,000	du sf
70	--	1218 W. Ingraham Street	Apartment	90	du
71	Palmetto and Mateo Project	555 S. Mateo Street	Retail	153,000	sf
72	--	1147 E. Palmetto Street	Apartment Hotel Restaurant	120 141 20,000	du room sf
73	--	742 S. Hartford Avenue	Condominium	58	du
74	--	732 S. Spring Street	Apartment Pharmacy/Drug Store	400 15,000	du sf
75	--	340 S. Hill Street	Apartment Restaurant	428 6,700	du sf
76	--	1728 W. 7th Street	Restaurant Bar	9,600 3,500	sf sf
77	--	1145 W. 7th Street	Condominium Apartment Retail	126 100 7,200	du du sf
78	Alameda and 4th Lofts Projects	360 S. Alameda Street	Apartment Restaurant Creative Office	55 2,500 6,300	du sf sf
79	The Reef – LA Mart/SOLA Village	1900 S. Broadway	Condominium Apartment Hotel Retail Office Gallery/Museum Gym	900 550 210 143,100 180,000 17,600 8,000	du du room sf sf sf sf
80	--	1929 W. Pico Boulevard	Charter School	480	stu
81	ETCO Homes Little Tokyo Apartment	118 S. Astronaut E. S. Onizuka Street	Apartment	77	du
82	Clinic at 7th and Wall Project	649 S. Wall Street	Assisted Living Medical Office	55 55	bed emp
83	--	500 S. Mateo Street	High-Turnover Restaurant	12,682	sf
84	Medallion Phase 2 Project	300 S. Main Street	Apartment Retail High-Turnover Restaurant	471 5,190 27,780	du sf sf
85	Alexan South Broadway Project	850 S. Hill Street	Apartment Retail Restaurant	300 3,500 3,500	du sf sf
86	400 S. Alameda Hotel Project	400 S. Alameda Street	Hotel Restaurant Retail	66 2,130 840	room sf sf
87	Apex II Mixed-Use Project	700 W. 9th Street	Condominium Retail	629 27,000	du sf
88	--	649 S. Olive Street	Hotel	241	room
89	Sapphire Mixed-Use Project	1111 W. 6th Street	Apartment Shopping Center Quality Restaurant Coffee Shop w/o Drive-Through	369 18,600 2,200 1,200	du sf sf sf
90	1633 W. 11th Street Charter School (K-5) Project	1633 W. 11th Street	School	460	stu
91	Grand Residences Project	1229 S. Grand Avenue	Condominium Restaurant	161 3,000	du sf

#	Project Name	Location/Address	Project Description	Number	Units
92	--	675 S. Bixel Street	Apartment Hotel Retail	425 126 4,874	du room sf
93	--	740 S. Hartford Avenue	Apartment	80	du
94	Lifan Tower Mixed-Use Project	1235 W. 7th Street	Condominium Retail	303 5,960	du sf
95	940 S. Hill Mixed-Use Project	940 S. Hill Street	Apartment Restaurant	232 14,000	du sf
96	--	1322 W. Linwood Avenue	Apartment	84	du
97	Efficiency City Apartments Project	801 E. 5th Street	Apartment Retail	160 10,057	du sf
98	14th and Olive Mixed-Use Project	1340 S. Olive Street	Apartment Retail Restaurant	156 5,000 10,000	du sf sf
99	--	1334 S. Flower Street	Apartment Retail/Restaurant	188 10,096	du sf
100	2nd and Vignes Project	929 E. 2nd Street	Private Specialty Retail Space Private Event Space Private Lounge/Bar Private Office/Photo Studios/Artist Studios Private Gym/Spa Private Screening Room Public Retail	1,024 8,157 10,955 45,786 6,378 70 30,143	sf sf sf sf sf seat sf
101	Spring Street Hotel	633 S. Spring Street	Hotel Quality Restaurant Bar/Lounge	176 8,430 5,290	room sf sf
102	Luxe Hotel Mixed-Use Project	1020 S. Figueroa Street	High-Rise Condominium Hotel Retail Restaurant	650 300 40,000 40,000	du room sf sf
103	--	1800 E. 7th Street	Apartment Office	122 13,600	du sf
104	--	1722 E. 16th Street	Restaurant	8,515	sf
105	--	720 W. Washington Boulevard	Senior Apartment Retail	105 2,650	du sf
106	1370 S. Flower Street Residential Project	1370 S. Flower Street	Apartment Retail	147 6,921	du sf
107	Beaudry Avenue and 2nd Street Mixed-Use Project	130 S. Beaudry Avenue	Apartment Retail	220 7,400	du sf
108	Urban View Lofts Project	495 S. Hartford Avenue	Apartment	220	du

Notes: du = dwelling unit, sf = square feet, emp = employee, stu = student
Source: Crain & Associates, Transportation Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, dated February 9, 2017.
Parker Environmental Consultants, 2017.



Source: Crain & Associates, February 9, 2017.

PARKER
ENVIRONMENTAL CONSULTANTS

Figure II-21
Related Projects Location Map

II. PROJECT DESCRIPTION
C. ENTITLEMENT REQUESTS

The Applicant, Frontier Holdings East, LLC, is seeking approval of the following entitlement requests:

1. Pursuant to **LAMC Section 17.01**, a one-lot subdivision vesting tentative tract map for 379 residential units.

2. Pursuant to **LAMC Section 16.05**, site plan review for a project that results in an increase of 50 or more dwelling units.

3. Pursuant to **LAMC Section 11.5.6**, a General Plan amendment to the Central City Community Plan from "Light Industrial" to "Regional Center Commercial,".

4. Pursuant to **LAMC Section 12.32.Q**, a vesting zone change and height district change from M2-2D to C2-4D, to allow for development of the site as proposed with a D limitation of 5.2:1 FAR.

5. Pursuant to **LAMC Section 12.21.G(3)**, a Director's Decision for 10 percent reduction in open space.

Pursuant to various sections of the Los Angeles Municipal Code, the Applicant would 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 and replacement of street trees within the public right-of-way, building and tenant improvements.

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study addresses 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 City of Los Angeles' *L.A. CEQA Thresholds Guide (2006)* unless otherwise noted.

ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743),[1] which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "Major Transit Stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21061.3 defines an "Infill Site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the *L.A. CEQA Thresholds Guide* (2006). The Project Site is also designated as a transit priority area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[2]

The Project Site is an infill site within a Transit Priority Area as defined by CEQA. It is located within ½ mile of the Pico Rail Station, located west of the Project Site, numerous bus routes with peak commute service intervals of 15 minutes or less. Accordingly, the Project's aesthetic impacts shall not be

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[1] *SB 743 is codified as Public Resources Code Section 21099.*

[2] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed February 2017.*

considered significant impacts on the environment pursuant to Public Resources Code Section 21099. The aesthetics analysis below is provided for informational purposes only. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

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

No Impact. Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

SB 743 defines a transit priority area as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the Public Resources Code (PRC). The proposed project involves the construction of a mixed-use development containing 25,810 square feet of retail space and 379 residential units on a 68,212-square-foot site (prior to dedications). The project site is located approximately 0.15 miles from the intersection of Metro Rapid Bus Lines 733 and 728 at Olympic Boulevard and Main Street and is identified as located within a transit priority area (City of Los Angeles Transit Priority Area Map, 2016). The proposed project is an infill development on a site that adjoins parcels that are developed with various urban uses. Properties to the north, west, east, and south are developed with commercial and residential uses. Furthermore, the project site does not contain any historic or cultural resources, as discussed in Section V. Cultural Resources of this Initial Study. The project site is not located within an overlay area (e.g., Specific Plan, Community Design Overlay, or Historic Preservation Overlay Zone) or subject to land use regulations that expressly regulates a project's aesthetic impacts (e.g., shade and shadow). As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, State Scenic Highways, and parking are not considered significant per SB 743.

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

No Impact. Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances.

Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

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c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

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parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the Public Resources Code (PRC). The proposed project involves the construction of a mixed-use development containing 25,810 square feet of retail space and 379 residential units on a 68,212-square-foot site (prior to dedications). The project site is located approximately 0.15 miles from the intersection of Metro Rapid Bus Lines 733 and 728 at Olympic Boulevard and Main Street and is identified as located within a transit priority area (City of Los Angeles Transit Priority Area Map, 2016). The proposed project is an infill development on a site that adjoins parcels that are developed with various urban uses. Properties to the north, west, east, and south are developed with commercial and residential uses. Furthermore, the project site does not contain any historic or cultural resources, as discussed in Section V. Cultural Resources of this Initial Study. The project site is not located within an overlay area (e.g., Specific Plan, Community Design Overlay, or Historic Preservation Overlay Zone) or subject to land use regulations that expressly regulates a project's aesthetic impacts (e.g., shade and shadow). As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, State Scenic Highways, and parking are not considered significant per SB 743.

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

No Impact. Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment.

SB 743 defines a transit priority area as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the Public Resources Code (PRC). The proposed project involves the construction of a mixed-use development containing 25,810 square feet of retail space and 379 residential units on a 68,212-square-foot site (prior to dedications). The project site is located approximately 0.15 miles from the intersection of Metro Rapid Bus Lines 733 and 728 at Olympic Boulevard and Main Street and is identified as located within a transit priority area (City of Los Angeles Transit Priority Area Map, 2016). The proposed project is an infill development on a site that adjoins parcels that are developed with various urban uses. Properties to the north, west, east, and south are developed with commercial and residential uses. Furthermore, the project site does not contain any historic or cultural resources, as discussed in Section V. Cultural Resources of this Initial Study. The project site is not located within an overlay area (e.g., Specific Plan, Community Design Overlay, or

Historic Preservation Overlay Zone) or subject to land use regulations that expressly regulates a project's aesthetic impacts (e.g., shade and shadow). As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, shade and shadow, light and glare, scenic vistas, State Scenic Highways, and parking are not considered significant per SB 743.

Cumulative Impacts

Less Than Significant Impact. The application of Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Proposed Project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Development of the Proposed Project in conjunction with the 108 related projects would result in an intensification of existing prevailing land uses in the transit priority area within the Central City Community within the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, each of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval. The site plan review process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant. Furthermore, under SB 743 and ZI No. 2542, aesthetic impacts of the Project shall not be considered a significant impact on the environment.

II. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The Project Site is located within a highly developed area of Central City Community Plan area in the City of Los Angeles. 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 2014" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[3] Therefore, no impact to agricultural lands would occur.

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

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[3] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed February 2017.*

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is currently zoned M2-2D with the General Plan land use designation of Light Industrial and is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site.[4] Therefore, no impact would occur.

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

No Impact. The Project Site is zoned M2-2D which has a General Plan land use designation of Light Industrial in the Central City Community Plan area. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is fully developed and currently contains commercial/retail properties. The Project Site is located in a highly developed area of the City of Los Angeles. There is no vegetation on-site. No forested lands or protected vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2014" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[5] Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the 108 related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural

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[4] *California Department of Conservation, State of California Williamson Act Contract Land Map 2015-2016, website: http://www.conservation.ca.gov/dlrp/lca, accessed February 2017.*

[5] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed February 2017.*

use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2014 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[6] The Project Site is located in an urbanized area in the Central City Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

III. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on December 7, 2012 ("2012 AQMP"). The transportation strategy and transportation control measures (TCMs), included as part of the 2012 AQMP and SIP for the South Coast Air Basin, are based on SCAG's 2008 Regional Comprehensive Plan (RCP) and 2011 Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the SCAG's recently adopted 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

As discussed in Question XIII(a), Population and Housing, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2016-2040 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is located in Downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. The Proposed Project would concentrate new development and jobs within half a mile (walking distance) from the numerous bus routes with peak commute service intervals of 15 minutes or less. Thus the Project's location provides opportunities for employees, guests, visitors, and residents to use public transit to reduce vehicle trips. The Project Site is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's mixed-use nature and close proximity to neighborhood-serving commercial/retail land

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[6] *Ibid.*

uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016-2040 RTP/SCS, the Proposed Project would not conflict with or obstruct implementation of the 2012 AQMP, and Project impacts would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, 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 Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2021. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing, (2) grading/excavation, (3) building construction, and (4) architectural coatings. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of VOC emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- **Site Clearing, Grading and Construction Activities:** Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.1*) as recommended by the SCAQMD. Table III-1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required and regulated by SCAQMD.

As shown in Table III-1, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Table III-1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing						
On-Site Fugitive Dust	--	--	--	--	1.35	0.21
On-Site Off-Road (Diesel Equipment)	2.30	22.68	14.89	0.02	1.29	1.20
Off Site (Hauling, Vendor, Worker)	0.19	4.15	1.37	0.01	0.40	0.12
Total Emissions	***2.49***	***26.83***	***16.26***	***0.03***	***3.04***	***1.53***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading						
On-Site Fugitive Dust	--	--	--	--	2.11	1.13
On-Site Off-Road (Diesel Equipment)	1.42	16.04	6.61	0.01	0.74	0.68
Off Site (Hauling, Vendor, Worker)	1.44	48.78	10.29	0.13	3.16	0.99
Total Emissions	***2.86***	***64.82***	***16.90***	***0.14***	***6.01***	***2.80***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	2.27	15.98	13.49	0.02	0.92	0.88
Off Site (Hauling, Vendor, Worker)	2.18	9.68	16.56	0.06	4.50	1.26
Total Emissions	***4.45***	***25.66***	***30.05***	***0.08***	***5.42***	***2.14***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	26.85	--	--	--	--	--
On-Site Off-Road Diesel Equipment	0.24	1.68	1.83	<0.01	0.11	0.11
Off-Site Hauling/Vendor/Worker Trips	0.35	0.24	2.61	<0.01	0.80	0.22
Total Emissions	***27.44***	***1.92***	***4.44***	***<0.01***	***0.91***	***0.33***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Calculation sheets are provided in case file.
Parker Environmental Consultants, 2017.

Operational Emissions

Air pollutant emissions are currently generated at the Project Site by the existing commercial land uses. These uses generate air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.1*) recommended by the SCAQMD. As shown in Table III-2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table III-2
Existing Daily Operational Emissions from the Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area	1.30	<0.01	<0.01	0.00	<0.01	<0.01
Energy	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Mobile Sources	3.36	14.59	34.99	0.10	7.70	2.14
Total Emissions	***4.66***	***14.62***	***35.01***	***0.10***	***7.70***	***2.14***
Wintertime (Non-Smog Season) Emissions						
Area	1.30	<0.01	<0.01	0.00	<0.01	<0.01
Energy	<0.01	0.03	0.02	<0.01	<0.01	<0.01
Mobile Sources	3.20	14.81	33.75	0.10	7.70	2.14
Total Emissions	***4.50***	***14.84***	***33.77***	***0.10***	***7.70***	***2.14***
Note: Calculation worksheets are provided in case file. *Parker Environmental Consultants, 2017.*						

The Proposed Project would result in the demolition of the existing structures and the development and operation of a mixed-use building with 379 residential dwelling units and approximately 25,810 square feet of ground floor commercial space. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.1*) recommended by the SCAQMD. The results of these calculations are presented in Table III-3, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table III-3
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area	8.67	0.36	31.38	<0.01	0.17	0.17
Energy	0.11	0.96	0.41	<0.01	0.08	0.08
Mobile Sources	3.61	16.01	31.41	0.10	7.46	2.05
Total Project Emissions	***12.39***	***17.33***	***63.20***	***0.10***	***7.71***	***2.30***
Less Existing Project Site Emissions	*-4.66*	*-14.62*	*-35.01*	*-0.10*	*-7.70*	*-2.14*
NET Project Emissions	**7.73**	**2.71**	**28.19**	**0.00**	**0.01**	**0.16**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area	8.67	0.36	31.38	<0.01	0.17	0.17
Energy	0.11	0.96	0.41	<0.01	0.08	0.08
Mobile Sources	3.41	16.05	30.92	0.10	7.46	2.05
Total Project Emissions	***12.19***	***17.37***	***62.71***	***0.10***	***7.71***	***2.30***
Less Existing Project Site Emissions	*-4.50*	*-14.84*	*-33.77*	*-0.10*	*-7.70*	*-2.14*
NET Project Emissions	**7.69**	**2.53**	**28.94**	**0.00**	**0.01**	**0.16**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculation worksheets are provided in case file.
Parker Environmental Consultants, 2017.

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regards to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would

not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed under Question III(b) above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.[7]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[8] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project include multi-family residential uses. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 50 meters (164 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

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[7] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

[8] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations especially during the demolition and grading phases. The Project Site's lot area is approximately 1.57 acres. Since thresholds are only provided for 1-, 2-, or 5- acre sites in SCAQMD's Final LST Methodology Document, the threshold for a 1-acre site was utilized for the Proposed Project's construction as a conservative estimate. As shown in Table III-4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table III-4
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing	22.68	14.89	2.64	1.41
Grading/Excavation	16.04	6.61	2.84	1.81
Building Construction	15.98	13.49	0.92	0.88
Architectural Coatings	1.68	1.83	0.11	0.11
SCAQMD Localized Thresholds [c]	**74**	**882**	**15**	**5**
Potentially Significant Impact?	**No**	**No**	**No**	**No**

[a] *The localized thresholds for all phases are based on a receptor distance of 164 feet in SCAQMD's SRA 1 for a Project Site of 1 acre.*

[b] *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

[c] *SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009, and Sample Construction Scenarios for Projects Less than Five Acres in Size.*

Source: CalEEMod 2016.3.1, Calculation sheets are provided in case file.

Parker Environmental Consultants, 2017.

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). Because the

Basin is currently in attainment and existing congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. Therefore, no further analysis for CO hotspots is warranted and localized operational emissions would be less than significant.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants in the form of diesel particulate emissions associated with the use of heavy trucks and construction equipment. The SCAQMD has not published guidance directly related to quantitatively assessing health risk impacts associated with construction activities. The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substances. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a long duration. For example, according to the Office of Environmental Health Hazard Assessment, estimating the cancer risk from toxic air contaminants should be based on a lifetime (i.e., 70-year) exposure period. The construction period would occur over an approximately 24-month period. Therefore, it is not meaningful to evaluate long-term cancer impacts from construction activities that occur over a relatively short duration. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Operational Emissions

The Proposed Project consists of a mixed-use development containing residential units and commercial uses. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from Proposed Project implementation. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project

involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Further, the Proposed Project would be required to install order-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138 to control odors from any operational activities within the proposed commercial uses.

With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in the already urbanized area of the City of Los Angeles.

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question III(c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving.

SCAQMD Rule 1108 and 1113 limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Proposed Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

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

Potentially Significant Unless Mitigation Incorporated. 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 located in a highly urbanized area in the City of Los Angeles and is improved with seven commercial/retail buildings. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. According to the Project's Tree Report, prepared by the Tree Resource, vegetation on the Project Site is limited to seven trees (Canary Pine) located in the public-right-of-way fronting Main Street. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 2:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements. Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services. Therefore, with adherence to regulatory code per the Urban Forestry Division, as discussed above, impacts resulting from the removal of any public street trees would be reduced to less than significant.

With respect to the proposed removal of non-protected trees currently located in the public right-of-way, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree

removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Section 3503 of the California Department of Fish and Game Code. To ensure compliance with the MBTA, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. Thus, with implementation of Mitigation Measure BIO-1, listed below, the Proposed Project would reduce impacts to sensitive biological species or habitat to less than significant.

Mitigation Measures:

BIO-1 (Habitat Modification (Nesting Native Birds)):

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
    - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
    - Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
    - The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

b) Would the project have a substantial adverse effect on any riparian habitat or other

sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No 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; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by seven commercial/retail buildings. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

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

No Impact. 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 the alteration of an existing wetland habitat. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above), and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a heavily urbanized area of in the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Thus, the Proposed Project would not interfere with the movement of any residents or migratory fish or wildlife. Therefore no impact would occur.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As stated above, the Project Site is improved with seven commercial/retail buildings. There are seven trees (Canary Pine) located in the public-right-of-way fronting Main Street. There are no protected tree species located on the Project Site. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. However, the existing street trees would be removed as a result of the Proposed Project. The removal and replacement of street trees is subject to the approval and tree replacement conditions set forth by the Board of Public Works. All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal shall be replaced at a 2:1 ratio with a minimum 24-inch box tree. Thus, the Proposed Project would not conflict with any tree preservation ordinance and any potential impacts associated with the removal of street trees would be reduced to less than significant levels with implementation of regulatory code per the Urban Forestry Division.

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

No Impact. A significant impact would occur if the Proposed Project would be inconsistent with maps or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance and mitigation. Development of the Proposed Project in combination with the 108 related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Thus, cumulative impacts to biological resources would be considered less than significant.

V. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of an historic resource pursuant to CEQA § 15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[9]

Section 15064.5(b)(2) of the CEQA Guidelines provides that "[t]he significance of an historical resource is materially impaired when a project:

> *(a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or*
>
> *(b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or*
>
> *(c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

The South Central Coastal Information Center (SCCIC) conducted an archaeological and historical records search of the California Historical Resources Information System (CHRIS) for the Project Site

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[9] *CEQA Guidelines, Section 15064.5(b)(1).*

including an approximate ½ mile radius of the area surrounding the Project Site on November 8, 2016. The records search results are summarized below. The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the Project Site and surrounding area.

According to available historical sources, the Project Site was formerly developed with urban retail operations and residences from at least 1888 and fully developed by circa 1907; and developed with the current structures from 1908 to 1976, which have remained through the present. As previously stated, the Project Site is currently developed with seven commercial/retail buildings. The Proposed Project entails the demolition of all existing structures on-site. The SCCIC concluded that the Project Site is not listed in the National Register of Historic Places, California Register of Historical Resources, or as a Los Angeles Historic-Cultural Monuments. Additionally, none of the existing buildings on the Project Site were identified as potentially being eligible for historic listing at the local, state, or federal level as part of SurveyLA. As discussed above, the seven on-site buildings are not historical resources as defined by CEQA.

The Proposed Project is located 100 feet to the east from the Harris Building and 200 feet to the east of the Commercial Club Building, located at 1100 W. 11th Street and 1100 S. Broadway, respectively.[10] The Project Site is also located within 450 feet east of the Herald Examiner Building, located at 1111 S. Hill Street.[11] The Commercial Club Building and Herald Examiner Building are both listed as Los Angeles Historic Cultural Monuments (HCM No. 1075 and HCM No. 178, respectively). The Herald Examiner Building is also listed on the National Register of Historic Places and the California Register of Historical Resources. Due to the distance between the Project Site and these two historic buildings, the Proposed Project would not directly or indirectly affect the historical significance of the Commercial Club Building or the Herald Examiner Building. The Proposed Project would have no direct impacts on other historical resources, as it does not involve the demolition, destruction, relocation, or alteration of any other resources. As such, development of the Proposed Project would result in a less than significant impact to historic resources.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project

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[10] *City of Los Angeles, Los Angeles Historic Resources Inventory, Commercial Club Building, website: http://historicplacesla.org/reports/6c61b469-d209-418c-9aaf-3dd072c26736, accessed January 2017.*

[11] *City of Los Angeles, Los Angeles Historic Resources Inventory, Herald Examiner Building, website: http://historicplacesla.org/reports/01138b8a-aee2-4896-a700-733ea594fd54, accessed January 2017.*

would disturb archaeological resources. The results of the CHRIS records search did not identify any known archaeological resources on the Project Site, and one archaeological resource was identified with ½ mile radius of the Project Site. The CHRIS records search showed that the Project Site has not been previously surveyed, and the existing development on the Project Site precludes the potential for subsurface exploration. Construction of the Proposed Project would entail demolition of the existing structures and excavation to a depth of approximately 33 to 40 feet below grade to allow for the proposed subterranean parking levels. In the absence of any known archaeological resources, the Proposed Project would not result in a significant impact upon a known archaeological resource. In the event that archaeological 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 such 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) Section 5097.98. Accordingly, the Proposed Project would result in a less than significant impact upon archaeological resources.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the project site. The Project Site has been previously graded and is currently improved with seven commercial/retail buildings. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resource.[12] Although no paleontological resources are known to exist on-site, there is a potential for paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during site excavation. In the event that paleontological resources are encountered during the construction phase, the construction activities would be required to comply with regulatory compliance measures with regards to paleontological resources. Work in the area of the find shall be halted until a qualified paleontologist has evaluated the find and provided recommendations to comply with California Public Resources Code Section 21083.2 for the proper handling of paleontological resources. As such, compliance with existing regulations would reduce potential impacts upon paleontological resources to less than significant levels.

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

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could be discovered on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If 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) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the other 108 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate regulatory compliance. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. GEOLOGY AND SOILS

The following section summarizes and incorporates the reference information from the Geotechnical Investigation prepared by Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 1100 through 1140 South Main Street, Los Angeles, California, dated September 14, 2016 ("Geotechnical Investigation").

Existing Subsurface Conditions

The Project Site was explored on July 27, and 28, 2016 by Geotechnologies, Inc. by excavating three exploratory borings to depths ranging from 50 to 80 feet below grade and excavating one test pit to a depth of 6 feet below grade. Fill materials were encountered in the exploratory borings to depths ranging between 3 and 10 feet below the existing grade. The fill consists of a mixture of silt, clay and sand, which is yellowish brown to dark brown in color, moist, stiff or medium dense, and fine grained, with occasional construction debris. The fill is in turn underlain by native alluvial soils consisting of interlayered mixtures of sand, silt, and clay. The native alluvial soils range from dark yellowish brown to dark grayish brown in color, and are moist, medium dense to very dense, or stiff, and fine to coarse grained, with gravel and cobbles. Groundwater was not encountered during exploration, conducted to a maximum depth of 80 feet below the existing grade. More detailed descriptions of the earth materials encountered may be obtained from the individual logs of the subsurface excavations in the Geotechnical Investigation, available in the case file.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone.

Based on the information contained in the Geotechnical Investigation by Geotechnologies, Inc., the Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potentially active faults are known to exist within the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the Proposed Project is considered low.

According to ZIMAS, the Project Site is located approximately 0.09 km of a known active fault, which is the Puente Hills Blind Trust Fault. The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices, and that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low, and potential impacts associated with seismic safety would remain less than significant. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to ground shaking.

b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends upon the earthquake magnitude, the distance from the source and the site response characteristics. The Project Site is not located within a seismic hazard zone for landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The primary seismic hazard for this Project Site is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. However, the potential for strong ground motion is not unusual in Southern California. Project Site parameters for seismic design are presented in the Geotechnical Investigation.

As such, the development of the Proposed Project is feasible for the intended use from a geotechnical engineering viewpoint provided the conclusions and recommendations stated in the Geotechnical Investigation are incorporated into design criteria and Project specifications and to the satisfaction of the Department of Building and Safety. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with seismic hazards would remain less than significant. Therefore, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to ground shaking.

c) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

Based on the City of Los Angeles General Plan Safety Element, the Project Site is not located in an area designated as "liquefiable".[13] As concluded in the Geotechnical Investigation, according to the State of California "Seismic Hazard Zones" map for the Hollywood Quadrangle (CDMG 1999), the Project Site is not within an area where historic occurrences of liquefaction, or local geologic, geotechnical conditions indicate a potential for liquefaction. Groundwater was not encountered during exploration, conducted to a maximum depth of 80 feet below the existing site grade.[14] Based on the density of the soils underlying the site, and the mapped depth to the historically highest groundwater level, the soils underlying the site are not considered capable of liquefaction during the ground motion expected during the design based earthquake. As the potential for liquefaction occurring at the Project Site is considered low, impacts would be less than significant. The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to liquefaction.

d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related significant adverse effect may occur if the Project Site is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Investigation, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. Based on the City of Los Angeles General Plan Safety Element, the Project Site is

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[13] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit B: Areas Susceptible to Liquefaction In the City of Los Angeles, June 1994.*

[14] *Partner Engineering and Science, Inc., concluded that a review of Geotracker for nearby properties indicated groundwater in the vicinity of the subject property is inferred to range between approximately 31 and 49 feet below ground surface (bgs) and flows generally toward the south (See Phase I Environmental Site Assessment Report, 1100-1132 & 1123-1137-C South Main Street and 106-112 East 11th Street, Los Angeles, California, 90015, May 26, 2015,). The Geotechnical Investigation provides direct evidence of groundwater levels based on specific site exploration.*

not located in a landslide inventory and hillside area.[15] Additionally, according to the State of California "Seismic Hazard Zones" map, the Project Site is not within an area with potential for earthquake-induced landslides.[16] The Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The probability of landslides, including seismically induced landslides, is considered to be very low due to the general lack of elevation difference across or adjacent to the Project Site. Therefore, no impact would occur.

e) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Although 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. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon so little soil would be exposed. 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, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of Best Management Practices ("BMPs") includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage

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[15] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit C: Landslide Inventory & Hillside Areas In the City of Los Angeles, June 1994.*

[16] *State of California, Department of Conservation, Division of Mines and Geology, Hollywood Quadrangle, Seismic Hazard Zones, Los Angeles County, California, March 25, 1999.*

under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil and as such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to the loss soil erosion or loss of topsoil.

f) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Project Site is not within a liquefaction zone and is not located in an area susceptible to liquefaction or collapse. Additionally, the Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The Geotechnical Investigation concluded that geotechnical conditions are favorable for the Proposed Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with unstable geologic unit or soils remain less than significant. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, lateral spreading, subsidence, liquefaction or collapse.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Based on the results of the Geotechnical Investigation, fill materials were encountered in the exploratory borings to depths ranging between 3 and 10 feet below the existing grade. The fill consists of a mixture of silt, clay and sand, which is yellowish brown to dark brown in color, moist, stiff or medium dense, and fine grained, with occasional construction debris. The fill is in turn underlain by native alluvial soils consisting of interlayered mixtures of sand, silt, and clay. The native alluvial soils range from dark yellowish brown to dark grayish brown in color, and are moist, medium dense to very dense, or stiff, and fine to coarse grained, with gravel and cobbles. An expansion test performed on two representative subsurface samples resulted in an expansion index of 28 and 50, respectively, which are considered low expansion potentials. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required. Accordingly, the design and construction of the Proposed Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated soil expansion would remain less than significant.

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

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any of the 108 related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to adhere to appropriate regulatory compliance measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, compliance with the regulatory compliance measures discussed above would ensure potential Proposed Project impacts are less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

VII. GREENHOUSE GAS EMISSIONS

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, set a mandate for the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. In its Climate Change Scoping Plan (2008), ARB developed a California statewide GHG emission inventory for years 1990–2004 to support the effort of determining the 1990 level and 2020 near-term emissions limit. To determine the amount of GHG emission reductions needed to reduce to 1990 emissions, ARB then developed a forecast of 2020 emissions in a business-as-usual scenario (2020 BAU), which is an estimate of the emissions expected to occur in the year 2020 if none of the foreseeable measures included in the Scoping Plan were implemented.

In May 2014, CARB published the First Update to the Climate Change Scoping Plan, where it revised the previously adopted 1990 GHG emissions level from 427 $MMTCO_2e$ to 431 $MMTCO_2e$ based on the scientifically updated global warming potential (GWP) values in the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report.[17] The total future emissions forecasted in the 2020 BAU scenario were also updated from the previously adopted estimate of 596 $MMTCO_2e$ to 509 $MMTCO_2e$. The updated 2020 BAU scenario includes reductions anticipated from the implementation of several policies aimed at reducing the statewide greenhouse gas emissions inventory which are now adopted into law (i.e., California's Low Carbon Fuel Standard, Pavley I and the Renewable Electricity Standard). While the Scoping Plan does not provide any specific mandates or policies that would directly affect the Proposed Project, the Scoping Plan encourages local municipalities to update building codes and establish sustainable development practices for accommodating future growth. As shown in Table III-5, below, the State anticipates it will meet its 2020 GHG emissions limit of 431 $MMTCO_2e$ through reductions in energy, transportation, waste and high-GWP sectors. The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. Thus, the estimated emission

[17] *The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.*

reductions attributed to the Cap-and-Trade Program depend on the emissions forecast. For example, if the emissions forecast increases, the reductions associated with the Cap-and- Trade Program will increase.

Table III-5
Climate Change Scoping Plan 2020 Emissions Target

Category	2020 CO_2e Emissions ($MMTOC_2e$) [a]
AB 32 Baseline 2020 Forecast Emissions (2020 BAU)	509
Expected Reductions from Sector-Based Measures	
Energy	- 25
Transportation	- 23
High-GWP	- 5
Waste	- 2
Cap and Trade Reductions	- 23 [b]
2020 Limit	= 431

[a] Based on AR4 GWP values.
[b] Cap and Trade emissions reductions depend on the emission forecast.
Source: CARB, First Update to the Climate Change Scoping Plan, May 2014.
Parker Environmental Consultants, 2017.

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State- mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis. The Proposed Project would implement the 2016 CALGreen Code (effective January 1, 2017) and any future additional construction activities necessary.

LA Green Plan

The City of Los Angeles has addressed the issue of global climate change through implementation of the *Green L.A., An Action Plan to Lead the Nation in Fighting Global Warming (L.A. Green Plan)* and has

updated its zoning Code to mandate increased energy efficiency measures in new construction. The *L.A. Green Plan* outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the *L.A. Green Plan*, Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. New development projects are required to comply with the *L.A. Green Building Code,* and therefore are generally considered consistent with statewide GHG-reduction goals and policies, including AB 32.

2016-2040 RTP/SCS

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016-2040 RTP/SCS). Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial projects that emit greater than 3,000 metric tons of CO_2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

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

Less Than Significant Impact. Notwithstanding the regulatory plans and building code updates discussed above, there are no federal, state or local adopted thresholds of significance for addressing a residential project's GHG emissions pursuant to CEQA. Section 15064.4 of the CEQA Guidelines provides direction to lead agencies in determining the significance of the impacts of GHGs, however, it does not establish a specific threshold of significant. Since neither the SCAQMD nor the City of Los Angeles have adopted quantitative thresholds of significance for a non-residential project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following:

> (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
>
> (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The Guidelines do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions. Therefore, for purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's 2016-2040 RTP/CSC, and the L.A. Green Building Code.

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers

traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.1*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table III-6, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table III-6, the total GHG emissions from construction activities related to the Proposed Project would be 1,856.72 metric tons, with the highest GHG emissions occurring in the year 2019.

Table III-6
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2019	1,195.91
2020	660.81
Total Construction GHG Emissions	**1,856.72**

[a] *Construction CO_2 values were derived using CalEEMod Version 2016.3.1*
Calculation data and results are provided in case file, Greenhouse Gas Emissions Calculations Worksheets.
Parker Environmental Consultants, 2017.

Operation

Baseline GHG Emissions

The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table III-7 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with existing operations at the Project Site. As shown in Table III-7, the existing operations on the Project Site generate approximately 2,071.05 CO_2e MTY.

Table III-7
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	<0.01
Energy	455.51
Mobile	1,531.20
Waste	30.74
Water	53.60
Total	**2,071.05**

Greenhouse gas emissions were estimated using CalEEMod Version 2016.3.1
Calculation data and results provided in case file, Greenhouse Gas Emissions Calculations Worksheets.
Parker Environmental Consultants, 2017.

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project's compliance with the Green Building Code and other mitigating features that would be effective in reducing GHG emissions. The Proposed Project's emissions were estimated using CalEEMod for a base project without the enhanced energy conservation measures mandated by the Green Building Code and with GHG reduction measures to effectively estimate the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table III-8, below, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Measures would be 5,522.36 CO_2e MTY and the Project With GHG Reduction Measures scenario would result in a net increase of 1,415.20 CO_2e MTY. For purposes of this comparison it should be noted that the Proposed Project's structural and operational features such as installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Project would reduce the Project's GHG emissions by approximately 5 percent. When considering the fact that the Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., AB32, SB375, and SCAG's 2016-2040 RTP/SCS growth strategy), the Proposed Project would realize a 74% reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use.

Through required implementation of the Green Building Code and because of the Proposed Project's location on an infill site as well as the Site's walkability and proximity to regional transit systems, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

Table III-8
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)		
	Project Without GHG Reduction Measures	Proposed Project with GHG Reduction Measures	Percent Reduction
Area	6.55	6.55	0%
Energy	1,947.32	1,703.13	13%
Mobile	3,071.95	1,397.35	55%
Waste	101.30	50.65	50%
Water	333.35	266.68	20%
Construction Emissions [a]	61.89	61.89	--
Project Total	**5,522.36**	**3,486.25**	**37%**
Less Existing Project Site	--	*-2,071.05*	--
Project Net Total	**5,522.36**	**1,415.20**	**74%**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project.*
[b] *The existing emissions were not deducted from the Project Without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active commercial/retail uses.*
Calculation data and results provided in case file, Greenhouse Gas Emissions Calculations Worksheets. Parker Environmental Consultants, 2017.

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

Less Than Significant Impact. Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The Proposed Project would comply with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond the "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the state's codes. The Proposed Project would incorporate several measures and design elements that reduce the carbon footprint of the development:

1. Infill Development. The Proposed Project is located on an infill site that is currently developed with seven commercial/retail buildings. The Proposed Project would include the demolition of the existing land uses which would off-set some of the Project's operational emissions. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

2. Transit Priority Area. The Proposed Project is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's mixed-use

nature and close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's vehicle miles traveled (VMTs) as compared to the base trip rates for similar stand-alone residential uses that are not located in close proximity to transit.

3. Energy Conservation. The Proposed Project must meet Title 24 2016 standards and include ENERGY STAR-rated appliances.

4. Solid Waste Reduction Efforts. The Proposed Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. Water Conservation. The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

As described above and in Question VII(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases and, the Proposed Project's impact would be less than significant.

Cumulative Impacts

The GHG emissions from mixed-use residential and commercial development are relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on global warming. As concluded above, the Proposed Project's generation of GHG emissions would represent a 74% reduction in GHG emissions with GHG reduction measures in place as compared to the Proposed Project's emissions in the absence of all of the GHG reducing measures and project design features. Furthermore, the Proposed Project would

be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a mixed-use development with up to 379 residential dwelling units and 25,810 square feet of ground-floor commercial uses.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity

of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The following section summarizes and incorporates the reference information from the following reports:

- Phase I Environmental Site Assessment Report, 1100-1132 & 1123-1137-C South Main Street and 106-112 East 11th Street, Los Angeles, California 90015, prepared by Partner Engineering and Science, Inc. ("Partner"), dated May 26, 2015 ("Phase I ESA").
- Preliminary Subsurface Methane Gas Investigation at 1100 South Main Street, Los Angeles, California, prepared by GeoKinetics, dated September 16, 2016 ("Methane Report").

The Project Site is developed with seven commercial/retail buildings. According to available historical sources, the Project Site was formerly developed with urban retail operations and residences from at least 1888 and fully developed by circa 1907; and developed with the current structures from 1908 to 1976, which have remained through the present. No historical resources dating to a time when the Project Site was undeveloped were available for the Phase I ESA.

Site Reconnaissance

On May 18, 2015, an environmental professional of Partner conducted a site reconnaissance of the Project Site. The purpose of the Phase I ESA is to identify existing or potential Recognized Environmental Conditions (RECs) affecting the Project Site that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the Project Site or require a material change in the use thereof; 3) require cleanup, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the Project Site under any applicable environmental law; 4) may affect the value of the Project Site; and 5) may require specific actions to be performed with regard to such conditions and circumstances. A Recognized Environmental Condition (REC) refers to the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. No areas of significant environmental concern were observed during the Project Site reconnaissance of the property and adjacent area. The Phase I ESA revealed no evidence of Recognized Environmental Conditions (RECs) or Controlled RECs (CRECs) in connection with the on-site properties.

A Historical Recognized Environmental Condition (HREC) refers to past release of any hazardous substances or petroleum products that has occurred in connection with the Project Site and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The on-site property, identified as Ix Hans Engineering Company, located at 1124 South Main Street, is listed on the Facility and Manifest (HAZNET) database. According to the database, 0.25 tons of tank bottom waste was manifested in 1995. No additional information is available regarding a potential former underground storage tank (UST) at this facility, and this facility is not listed on any UST databases or any databases

indicating an unauthorized release. The client provided Partner with a No Further Action (NFA) letter from LAFD dated January 14, 1998, which indicated a Closure Report was submitted for Ana Trading Company at 1137 South Main Street dated October 1995. However, City directory research indicates Ana Trading Company was located at 1124 South Main Street, so it is likely the HAZNET listing and the LAFD letter are related. No details are available regarding any soil, groundwater, or soil gas sampling or the concentrations of contaminants left in place, if any. However, the Phase I concluded that based upon closure of the presumed UST, the presumed UST represents a HREC only and no further site investigation is warranted.

Methane

The Project Site is located within a City of Los Angeles Methane Zone. In accordance with the City's building code requirements, the Project Applicant was required to submit a Form 1- Certificate of Compliance for Methane Test Data. GeoKinetics tested the methane concentrations on the Project Site and prepared a Methane Report, dated September 16, 2016. Multi-stage subsurface gas probes were installed to monitor methane and gas pressures. According to the Methane Report, the Project Site contains methane levels that would classify it as a Level I site. The Proposed Project would be required to implement design features and mitigation measures required by the Department of Building and Safety for a Level I site to ensure that impacts related to methane would be less than significant. Additionally, compliance with LAMC Sections 91.7101 through 91.7109 for structures within a methane zone would ensure that impacts related to methane gas are reduced to less than significant levels.

Asbestos-Containing Materials (ACMs)

Commercial use of asbestos containing materials (ACM) as a building material was banned by the federal government in 1989. Since the on-site buildings were built prior to 1989, asbestos-containing materials may be present. No asbestos testing was conducted by Partner. Exposure to ACMs during demolition activities would be harmful to construction workers. Prior to the demolition activities, a complete asbestos survey would be conducted to identify all sources of asbestos, as required by the U.S. EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403. Bulk samples of all materials that are suspected of containing asbestos would be collected and analyzed for asbestos content. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials that are identified as ACMs would be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations would be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process would be chosen based on experience, reputation, and relationship with local agencies such as SCAQMD and OSHA regional offices. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the Project Site follows the various guidelines required by SCAQMD Rule 1403,

as well as all other applicable state and federal rules and regulations, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Lead-Based Paint (LBPs)

The federal government also banned the use of lead in household paints in 1978. Based on the age of the on-site structures, there is a potential for lead-based paint at the Project Site. Exposure of workers to lead-based paint during demolition of the existing structures would be a hazardous to the health of the construction workers. A qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Compliance with mandatory state and federal regulations would ensure that the potential lead-based paint on-site would be handled properly and impacts associated with the exposure to lead-based paint would be less than significant.

No areas of significant environmental concern were observed during the Project Site reconnaissance of the properties and adjacent area. Additionally, no RECs were identified in relation to the Proposed Project. With the Proposed Project's compliance with mandatory state and federal regulatory compliance measures, potential impacts associated with the release of a hazardous material would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect may occur if the Project Site is located within 0.25-miles of an existing or proposed school site and would handle hazardous materials that may release hazardous emissions, which would pose a health hazard beyond regulatory thresholds.

There are no Los Angeles Unified School District (LAUSD) schools located within a one-quarter mile from the Project Site. Additionally, the proposed haul route would not pass by any LAUSD schools. Thus, the construction activities do not pose a risk to any nearby school. The Proposed Project would comply with the applicable requirements and regulations to ensure that impacts relating to the demolition and construction would be less than significant. Furthermore, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be typically associated with the operation and activities of residential and commercial uses, and use of these substances would comply with State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and a less than significant impact would occur.

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

Less Than 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. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

Environmental records were reviewed to determine if there are any on- or off-site sources of documented environmental concerns. The property identified as Ix Hans Engineering Company, located at 1124 South Main Street is listed on the HAZNET database. According to the database, 0.25 tons of tank bottom waste was manifested in 1995. No additional information is available, and this facility is not listed on any UST databases or any databases indicating an unauthorized release. The on-site property identified as 11th and Main Partners, LLC, located at 1100-1132 South Main Street, manifested 8.42 tons of asbestos containing waste in 2006. No additional information is available. Based on the regulatory status, this listing is not expected to represent a significant environmental concern. In addition, the on-site property, (identified as 11th and Main Partners, LLC at 106-112 South Main Street) manifested 2.52 tons of asbestos containing waste in 2006. No additional information is available, and this facility is not listed on any UST databases or any databases indicating an unauthorized release. Based on the regulatory status, this listing is not expected to represent a significant environmental concern. The on-site property, identified as Lax C Incorporated, located at 1100 South Main Street, manifested 2.33 tons of oil/water separator sludge in 2004. No additional information is available. However, this facility is not listed on any UST databases or any databases indicating an unauthorized release. Based on the regulatory status, this listing is not expected to represent a significant environmental concern. Therefore, no significant environmental concerns or violations were recorded or identified in relation to the Project Site, and no further action is warranted.

Based on the absence of any outstanding violations or reported releases, as well as the results from a previous subsurface assessment, the Project Site poses no significant environmental concerns, and there is no evidence of RECs in connection with the Project Site. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With the Proposed Project's compliance with mandatory state and federal regulatory compliance measures, potential impacts associated with the release of a hazardous material would be less than significant.

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

No Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 17 miles west of the Project Site. As the airport is not located within two miles of the Project Site, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Furthermore, the Project Site is not located in an airport hazard area. Therefore, no impact would occur.

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

No Impact. This question would apply to the Proposed Project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is located approximately 15 miles south of the Bob Hope Airport in Burbank. As such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Therefore, no impact would occur.

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

Potentially Significant Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

Based on the Los Angeles Department of Public Works Disaster Route Map for the City of Los Angeles Central Area, the Project Site is not located on an identified disaster route.[18] In the City of Los Angeles Safety Element Exhibit H, Critical Facilities & Lifeline Systems, the Project Site is located on a selected disaster route along Main Street.[19] Development of the Proposed Project may require temporary and/or partial street closures due to construction activities. Implementation of Mitigation Measure T-1 and T-2, as discussed in Section XVII, would mitigate any construction impacts with respect to traffic to less than significant. Nonetheless, while such closures may cause temporary inconvenience, they would not be

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[18] *Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

[19] *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and any impacts would be mitigated to less than significant levels.

h) Would the project 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?

No Impact. The Project Site is located in a highly urbanized area of Downtown Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ)[20] and as such, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the 108 related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

[20] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: www.zimas.lacity.org, accessed January 2017.*

IX. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

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 body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the 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 or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and construction of development and redevelopment projects. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

The Project Site is currently developed with seven commercial/retail buildings. The Project Site is completely covered with impervious surfaces. Thus, 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. Existing storm drain lines serving the Project Site are located along S. Main Street and E. 11th Street. Stormwater flows south along S. Main Street and onto stormwater inlets on the corner of S. Main Street and E. 12th Street. Stormwater along E. 11th Street flows eastbound along 11th Street and onto stormwater inlets on the corner of S. Los Angeles Street and E. 11th Street.[21] These storm drain lines are owned and maintained by the City of Los Angeles. The Proposed Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CASOO4001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833,

[21] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, February 2017.*

which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[22]

The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve nonresidential use and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.[23] Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[24]

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and / or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to

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22 *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

23 *City of Los Angeles Ordinance No. 183,833, 2015.*

24 *Ibid.*

the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[25]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. 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.

As discussed in Question IX (a) the Project Site is 100 percent impervious. As such, 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. Groundwater was not encountered during exploration, conducted to a maximum depth of 80 feet below the existing grade. The historically highest groundwater level is at a depth of 115 feet below the ground surface.[26] The Proposed Project would excavate soils beneath the Project Site at approximately 33 to 40 feet below grade to allow for the construction of the proposed subterranean parking levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table

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[25] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

[26] *Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 1100 through 1140 South Main Street, Los Angeles, California, September 14, 2016.*

would be less than significant.

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

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 is located in a highly urbanized area of the City of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project Site is 100 percent impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns. Further, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

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

Less Than Significant Impact. 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 Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. In addition, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control, and as such, impacts would be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. 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 or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

Currently, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located along S. Main Street and E. 11th Street. Stormwater flows south along S. Main Street and onto stormwater inlets on the corner of S. Main Street and E. 12th Street. Stormwater along E. 11th Street flows eastbound along 11th Street and onto stormwater inlets on the corner of S. Los Angeles Street and E. 11th Street.[27] These storm drain lines are owned and maintained by the City of Los Angeles. Pursuant to local practice and City policy, stormwater retention or treatment BMPs would be required as part of the LID requirements. Any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first ¾ –inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), which would reduce the Proposed Project's impact to the stormwater infrastructure. Additionally, any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. The Proposed Project would comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality would ensure impacts are less than significant. Therefore, the Proposed Project would not create or contribute to runoff water, which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Potential impacts to surface water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

No 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, which could potentially degrade water quality and would comply with all federal, state and local regulations governing stormwater discharge. Construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Therefore, no impact would occur.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if the Proposed Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA), the Project Site is not located in an area designated as a 100-year flood hazard area. The Project Site in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.[28] Therefore, the Proposed Project would not place housing within a 100-

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[27] *City of Los Angeles, Bureau of Engineering, Navigate LA, website: http://navigatela.lacity.org/navigatela/, accessed February 2017.*

[28] *Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel Number 06037C1610F, September 26, 2008, website: http://dpw.lacounty.gov/wmd/floodzone/, accessed February 2017*

year flood hazard area, and no impact would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.[29] The Project Site is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. A significant impact may occur if the Proposed 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. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. A review of the City of Los Angeles General Plan Safety Element indicates that the Proposed Project does not lie within an inundation or tsunami hazard area.[30] Thus, 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. Therefore, no impact would occur with respect to the failure of a levee or dam.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. As stated above, 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. According to the City of Los Angeles General Plan Safety Element, the Proposed Project does not lie within an inundation or tsunami hazard area.[31] Furthermore, the Project Site and the surrounding area are highly urbanized and relatively flat. The Proposed Project's potential for landsliding

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[29] *Ibid.*

[30] *City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

[31] *Ibid.*

is considered to be low due to the lack of an elevation difference across and adjacent to the Project Site. Additionally, the Project Site is not located within a potentially "liquefiable" area and, based on the site-specific liquefaction analysis included in the Geotechnical Investigation, the Project Site is not be prone to liquefaction.[32] Thus, the occurrence of mudflows on the Project Site is considered low and no impact would occur with respect to slope instability, tsunamis, and seiches.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the 108 related projects would result in the further infilling of uses in a highly developed area within the City of Los Angeles. As discussed above, the Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, under the requirements of Article 4.4 of the LAMC, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant.

X. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located in an urbanized area of the Central City Community Plan Area (CPA) and would be consistent with the existing physical arrangement of the properties within the vicinity of the

[32] *Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Mixed-Use Development, 1100 through 1140 South Main Street, Los Angeles, California, September 14, 2016.*

Project Site. The zoning designation for the Project Site is M2-2D (Light Industrial) and the General Plan land use designation for the Project Site is Light Manufacturing. Zones corresponding to the Light Industrial designation include MR2 and M2 zones. The Applicant is requesting a zone change from M2-2D to C2-4D to allow for the development of a mixed-use residential building with 379 dwelling units and 25,810 square feet of ground floor retail/creative office. As discussed in Section II. Project Description, and shown in Figure II-5, the Project Site is surrounded by commercial/retail, office, light industrial, and mixed-use properties. Properties to the north (east of Main Street), south (east of Main Street), and east of the Project Site are all zoned M2-2D with a Land Use Designation of Light Manufacturing. Properties located to the west of the Project Site (across Main Street) are generally zoned C2-4D-O with a Land Use Designation of Regional Center Commercial. As such, no separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning designations are created to avoid or mitigate. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: Central City Community Plan area, the City Center Redevelopment Project area, the Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Downtown Parking District, the Downtown Adaptive Reuse Incentive Area, and the Los Angeles State Enterprise Zone. The Project Site is also within a transit priority area pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.[33] These documents guide development at the Project Site.

Regional Plans

SCAQMD Air Quality Management Plan

As discussed in Section III, Air Quality, The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's Air Quality Management Plan (AQMP) was updated in 2003 to establish a comprehensive

[33] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed February 2017.*

air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. The most recent AQMP was adopted on December 7, 2012. As the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project, the Proposed Project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan

The Project Site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The Proposed Project would be consistent with policies set forth in the RCP, as the Proposed Project would redevelop a site that is currently developed with seven commercial/retail properties and include the construction of a mixed-use development with multi-family residential and neighborhood-serving commercial uses. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential opportunities within a Transit Priority Area. Furthermore, as the Proposed Project would add approximately 379 residential units to the downtown area, generating approximately 580 residents. The Proposed Project's estimated population growth would be consistent with SCAG's growth projections.

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. The Project Traffic Study was prepared in accordance with the County CMP and the City of Los Angeles Department of Transportation (LADOT) Guidelines. Project traffic impacts are analyzed in greater detail in Section XVI, Transportation and Traffic, of this IS/MND.

Local Plans

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.

The elements that would be most applicable to the Proposed Project are the Housing Element, the Mobility Plan, and the Land Use Element. As shown in Table III-9, the Proposed Project would promote the goals of the Housing Element and the Mobility Plan. Consistency with the Land Use Element/Central City Community Plan is further analyzed in Table III-10. As shown in Table III-9, the Proposed Project

would promote the goals of the Housing Element and the Mobility Plan. The Proposed Project has been designed to comply with all applicable General Plan and zoning designations.

Table III-9
City of Los Angeles General Plan Consistency Analysis

City of Los Angeles General Plan Goals	Project Consistency Analysis
Housing Element Goals	
1. A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.	**Consistent.** The Proposed Project would increase the housing stock in Downtown Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, two-bedroom, and three-bedroom residential dwelling units. The 379 units included in the Proposed Project would be available to all persons without discrimination. Additionally, the Proposed Project would set aside eleven percent of its base residential units as very low-income units. Thus, the Proposed Project is contributing to the range of housing choices available in downtown Los Angeles and is therefore consistent with this goal.
2. A City in which housing helps to create safe, livable and sustainable neighborhoods.	**Consistent.** The Proposed Project would redevelop a site that is currently occupied by seven commercial/retail buildings. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with regulatory compliance measures (relating to aesthetics and discussed in Section I, Aesthetics) would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Proposed Project would eliminate and prevent the spread of blight and deterioration by redeveloping an underutilized site. The Proposed Project is therefore consistent with this goal.
3. A City where there are housing opportunities for all without discrimination.	**Consistent.** The Proposed Project would reserve 11 percent of its base density units for very low-income tenants, and the remaining dwelling units would be available at market rate. The Proposed Project is increasing the housing choices available in Downtown Los Angeles. The Proposed Project's housing opportunities would be available to all persons, without discrimination. The Proposed Project would be consistent with this goal.
Mobility Plan Key Goals	

1. Safety First: Crashes, speed, protection, security, safety education, and enforcement.	**Consistent.** The Proposed Project would not include unusual or hazardous design features. The Project Site is generally pedestrian-oriented with limited vehicle parking. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. The Proposed Project does not include any hazardous design features, which could impede emergency access. The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety. Therefore, the Proposed Project would not substantially increase hazards due to design features, or incompatible uses, and would not hinder this goal.
2. World Class Infrastructure: Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.	**Consistent.** This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project's location near mass transit, walking distance to services, retail stores, and employment opportunities, and the availability of bike parking located on the Project Site promotes a variety of transportation options. Thus, the Proposed Project would promote this goal.
3. Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, community connections.	**Consistent.** The Project Site is located in a highly urbanized area of Downtown Los Angeles within a TPA. The Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this goal.
4. Collaboration, Communication and Informed Choices: Real-time information, open-source data, transparency, monitoring, reporting, departmental and agency cooperation, database management, parking options, loading and unloading, goods movement.	**Consistent.** This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, with respect to collaboration and department cooperation, the Traffic Study analysis prepared for the Proposed Project was determined in conjunction with the City of Los Angeles Department of Transportation (LADOT) and conducted in accordance with the LADOT Traffic Study Guidelines. The Proposed Project would provide parking on site and on-site loading areas.

5. Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.	**Consistent.** The Proposed Project is an infill development in a TPA and is within a major employment center. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Sections III. Air Quality and VII. Greenhouse Gas Emissions, operational emissions and greenhouse gas emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Proposed Project would be consistent with this goal.
Sources: City of Los Angeles General Plan Elements, Housing Element 2013-2021, Chapter 6, Housing Goals, Objectives, Policies and Programs; and City of Los Angeles General Plan Elements, Mobility Plan 2035. *Parker Environmental Consultants, 2017.*	

Central City Community Plan

The Project Site is located within the Central City Community Plan ("Community Plan") area of the City of Los Angeles. All development activity on-site is subject to the land use regulations of the Central City Community Plan. The Community Plan goals and objectives include providing organized growth, a Central City identity, and a full range of housing choices for employees and residents in the downtown area. The Proposed Project, which would provide a mixed-use residential/commercial development in an underutilized area of Central City, would conform to the goals, objectives, and land uses identified in the Community Plan.

The Proposed Project would revitalize the area with the development of an eight-story mixed-use residential and commercial building. The Proposed Project would provide a maximum of 379 dwelling units and 25,810 square feet of ground-floor commercial space with a total of 429 automobile parking spaces and 443 bicycle spaces. The Proposed Project would provide a variety of on-site amenities, which may include but is not limited to, a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, private decks, clubroom, two lounge rooms and two street plazas that would be open to the public. A detailed analysis of the Proposed Project's consistency with the applicable objectives and policies of the Community Plan for Residential and Commercial Land Uses is presented in Table III-10, below.

Table III-10
Project Consistency with Applicable Objectives and Policies of the
Central City Community Plan Land Use Element for Residential and Commercial Land Uses

Objective / Policy	Project Consistency Analysis
Residential	
Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.	**Consistent.** The Proposed Project would increase the housing stock in Downtown Los Angeles with centrally located studios, one-bedroom, two-bedroom, and three-bedroom residential units. The units would be available to all persons, including existing Downtown employees and residents, without discrimination. Additionally, eleven percent of the residential units would be reserved as very low-income units. This would diversify the housing stock in the Central City community and provide affordable housing. Thus, the Proposed Project would contribute to the range of housing choices available to Downtown employees and residents.
Objective 1-3: To foster residential development which can accommodate a full range of incomes.	**Consistent.** The Proposed Project's dwelling units would be available at market rate with the exception of residential units that would be reserved for very low-income residents (approximately eleven percent of the base density residential units). The Proposed Project would increase the housing choices available in Downtown Los Angeles. The Proposed Project can attract new and existing, economically, and ethnically diverse households, which is a goal of the General Plan and Community Plan. Thus, the Proposed Project supports this objective.
Policy 1-3.1: Encourage a cluster neighborhood design comprised of housing and services.	**Consistent.** The Proposed Project is located within a TPA. The Project Site is located in a highly urbanized area of Downtown Los Angeles. The Project Site is in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus. Thus, the Proposed Project supports the cluster neighborhood design concept of including residents near neighborhood facilities.
Objective 1-5: To preserve the existing low-income housing stock, including single room occupancy (SRO) units.	**Consistent.** The Proposed Project would not demolish existing low-income housing. Therefore, the Proposed Project would not conflict with this objective.
Policy 1-5.1: Monitor the supply of low-income housing stock to guard against loss of units demolition, conversion, and deterioration of units.	**Consistent.** There are no residential units on-site, and development of the Proposed Project would not demolish or otherwise deteriorate residential units. As such, the Proposed Project would not demolish, convert, or deteriorate low-income housing.
Commercial	

Objective / Policy	Project Consistency Analysis
Objective 2-1: To improve Central City's competitiveness as a location for offices, business, retail, and industry.	**Consistent.** The Proposed Project includes up to 25,810 square feet of ground-floor commercial space for retail and/or creative office uses. The Proposed Project would provide new housing, which would provide new foot traffic to support existing and new businesses within the surrounding commercial corridors. The Proposed Project would foster new business and employment opportunities for potential customers, which would help to improve the competitiveness of the Downtown commercial area. Thus, the Proposed Project supports this objective.
Policy 2-1.2: To maintain a safe, clean, attractive, and lively environment.	**Consistent.** The Proposed Project is designed to be visually compatible with the surrounding buildings and character of the neighborhood. Additionally, the design of the proposed building would not conflict with the Downtown Design Guide. All building plans would further require approval from the City. Compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation. Thus, the Proposed Project would be consistent with this policy.
Objective 2-2: To retain the existing retail base in Central City.	**Consistent.** The Project Site is currently developed with seven commercial/retail buildings. The Proposed Project would demolish the existing buildings in order to construct up to 25,810 square feet of ground-floor commercial space, which provides new opportunities for new businesses or the expansion or relocation of existing businesses. The Proposed Project would not adversely impact other retail stores in the vicinity of the Project Site. Instead, new residents would likely be new customers that would support nearby local businesses. As such, the Proposed Project would not hinder the goals of this objective.
Policy 2-2.1: Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.	**Consistent.** The Proposed Project includes up to 25,810 square feet of ground-floor commercial space. As such, the Proposed Project provides new commercial space and opportunities that can attract businesses Downtown. As such, the Proposed Project would be consistent with this policy.
Policy 2-2.2: To encourage pedestrian-oriented and visitor serving uses during the evening hours especially along Grand Avenue cultural corridor between the Hollywood Freeway (US 101) and Fifth Street, the Figueroa Street corridor between the Santa Monica Freeway (I-10) and Fifth Street and Broadway between Third Street and Ninth Street.	**Consistent.** The Proposed Project would locate approximately 580 new permanent residents and provide up to 25,810 square feet of ground-floor commercial space. The Project Site is in walking distance from many services, employment opportunities, and retail spaces. Additionally, the Project Site is located in a transit-rich area and is in close proximity to numerous bus and subway lines. Thus, the Proposed Project would encourage a pedestrian-oriented development that would support activities and uses into the evening hour. Although the Proposed Project is not located on Grand Avenue, the Proposed Project would support the intent of this policy.

Objective / Policy	Project Consistency Analysis
Policy 2-2.3: Support the growth of neighborhoods with small, local retail services.	**Consistent.** The Proposed Project would include neighborhood serving ground-floor commercial space. Thus, the Proposed Project would add local retail services to support the growth of the surrounding neighborhood. The Proposed Project would be consistent with the policy.
Objective 2-3: To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.	**Consistent.** The Proposed Project would be consistent with the surrounding neighborhood by adding a mixed-use building to an area that is characterized by commercial and mixed-use development. The building's design and ground-floor commercial would enhance pedestrian activity in the area. Thus, the Proposed Project would be consistent with this objective.
Objective 2-4: To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.	**Consistent.** The proposed mixed-use development would contribute and support this objective by adding new residents and ground-floor commercial space. The Proposed Project would be designed to enhance pedestrian activity with the retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. These features, among others, would contribute to an active, 24-hour downtown environment. Thus, the Proposed Project would be consistent with this objective.
Policy 2-4.1: Promote nightlife activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.	**Consistent.** The Proposed Project includes ground-floor commercial space. The commercial space would include retail and/or creative office spaces. The Proposed Project would enhance pedestrian activity with the retail stores' main entrances fronting the public right-of-way and provide night-time lighting for enhanced security. Thus, the Proposed Project would be consistent with this policy.
Objective 2-5: To increase specialty and ethnic markets in order to foster a diverse range of retail and commercial uses in Central City.	**Consistent.** The Proposed Project provides new ground-floor commercial space, which would be utilized as retail and/or creative office spaces, which may include specialty and ethnic stores. Thus, the Proposed Project supports this objective.
Policy 2-5.1: Make Downtown a tourist destination by combining its cultural commercial offerings with those of the ethnic communities surrounding it.	**Consistent.** This policy is not directly applicable to the Proposed Project, since the Project Site does not contain any cultural commercial land uses. The redevelopment of the Project Site would support and promote visitors downtown and visitors to cultural and tourist destinations.
Source: City of Los Angeles, Central City Community Plan, Land Use and Planning Element. Parker Environmental Consultants, 2017.	

The Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. The Community Plan projected a population of 27,029 persons and 16,457 dwelling units by 2010 within the Community Plan area.[34] The

[34] *City of Los Angeles Department of City Planning, Central City Community Plan, page II-3.*

2010 United States Census shows that the Community Plan area had an actual population of approximately 37,675 persons and 23,054 dwelling units in 2010.[35] The 2010 Census data shows that the actual population and housing units in the Community Plan area in 2010 was higher than what was projected. Nevertheless, as discussed in Section XIII, Population and Housing, the Proposed Project would be consistent with SCAG's population and housing growth projections for the City.

The Proposed Project would be consistent with the goals, objectives, and policies set forth in the Community Plan. Therefore, impacts related to the consistency with the applicable land use and planning policies in the Community Plan would be less than significant.

Redevelopment Plan for the City Center Redevelopment Project

Development on the Project Site is further defined by the Redevelopment Plan for the City Center Redevelopment Project ("Redevelopment Plan"). Specific design considerations from the Redevelopment Plan include: height, development densities, building setbacks, signage, open space and privacy, utilities, parking and loading facilities. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the City Center area. The City Center area encompasses much of the Historic Core, City Markets, and South Park. The Proposed Project is located within the City Markets neighborhood of the City Center Redevelopment Project area, which was established by the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Due to State legislation, the CRA/LA has since been disbanded and there is a successor agency to the CRA/LA. Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in May 2002 by the CRA/LA and remains effective until May 2032. The Redevelopment Plan's objective for the City Markets area is to recognize its role in providing facilities for very low-income and homeless individuals along with a mix of light industrial, wholesale and distribution uses. Rehabilitation of this area is in part dependent on addressing the social, medical and economic problems of the Central City population. A major share of land use shall be devoted to encouraging industry, commerce, and the warehousing and distribution of specialized retail and wholesale goods and products.[36] Table III-11, below, provides a detailed analysis of the consistency of the Proposed Project with the applicable objectives of the Redevelopment Plan. If and until such time as the Successor Agency to the CRA/LA transfers land use functions to the City, the Successor Agency to the CRA/LA has jurisdiction over the implementation of the Redevelopment Plan.

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[35] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 1, 2016.*

[36] *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, adopted May 15, 2002, Ordinance: 174593.*

Table III-11
Project Consistency with Applicable Objectives of the Redevelopment Plan

Objective	Project Consistency Analysis
To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.	**Consistent.** The Proposed Project would redevelop a site that is currently occupied by seven commercial/retail buildings. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with regulatory compliance measures would further ensure that the building maintains a safe, clean, and attractive environment during the Proposed Project's construction and operation. As such, the Proposed Project would eliminate and prevent the spread of blight and deterioration by redeveloping an underutilized site in accordance with the Redevelopment Plan. The Proposed Project would be consistent with the objective.
To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.	**Consistent.** The Proposed Project would be designed and developed with the guidance of City Planning Staff and the applicable plans. Therefore, the Proposed Project would further the goals of the Los Angeles General Plan, Framework Element, Concept Plan, City-wide Plan, the Central City Community Plan, and the Downtown Strategic Plan. Thus, the Proposed Project would be consistent with this objective.
To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.	**Consistent.** The Proposed Project would contribute up to 379 dwelling units, which would contribute to an increase of population and housing. The Proposed Project's housing and population generation would be consistent with SCAG's growth projections for the Los Angeles Subarea. Additionally, the Proposed Project would be consistent with the City's goals of increasing housing in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled; increasing safe and healthy housing options downtown; and increasing the diversity of the housing stock. Therefore, the Proposed Project would be consistent with Central City development goals and growth projections and would not hinder the implementation of this objective.
To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.	**Consistent.** The Proposed Project's would provide up to 25,810 square feet of ground-floor commercial space, which would increase employment opportunities in downtown and contribute to the Project Area's tax base. Thus, the Proposed Project would be consistent with this objective.
To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.	**Consistent.** The Proposed Project would be consistent with this objective since it proposes the development of an underutilized site that is currently used as commercial/retail. The Proposed Project would be designed with the guidance of applicable plans and design guidelines, City Planning Staff, and other City departments as needed. Therefore, the Proposed Project would be consistent with this objective.

Objective	Project Consistency Analysis
To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.	**Consistent.** The Proposed Project would supplement the area with new residential units and ground-floor commercial spaces. Additionally, the Proposed Project is designed to promote pedestrian activity with the retail stores' main entrances fronting the public right-of-ways and providing night-time lighting for enhanced security. The Proposed Project would also include two plazas on the ground floor that would be open to the public along S. Main Street and 11th Street. The Project Site's location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Proposed Project would be consistent with this objective.
To create a symbol of pride and identity which gives the Central City a strong image as the major center of the Los Angeles region.	**Consistent.** The Proposed Project would be consistent with this objective and preserve and contribute to the area's symbol of pride and identity by introducing residential and commercial development that would be consistent with the Downtown Design Guidelines. Therefore, the Proposed Project furthers the goals of this objective.
To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through, and out of the Central City.	**Consistent.** This objective is directed towards City goals and does not specifically pertain to the Proposed Project. The Proposed Project would place new housing and commercial space in a highly walkable and transit-rich area. As such, residents and employees of the Proposed Project can easily move around the Central City area and greater Los Angeles region. Therefore, the Proposed Project furthers the goals of this objective.
To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.	**Consistent.** The Downtown Design Guide guides the design of the Proposed Project. As such, the Proposed Project would be consistent with the design and development goals of the Central City CPA. As such, the Proposed Project would be attractively designed and landscaped. The Proposed Project would provide approximately 36,650 square feet in private and common open space to its residents, which would reduce the Project's demand on local parks and open space. By providing on-site open space and the payment of the park mitigation fee, the Project's impacts on local parks would be less than significant. The Proposed Project would also provide two public plaza that would be open to the public along S. Main Street and along 11th Street. With development of the proposed public plazas, landscaping and street trees, the Proposed Project would promote pedestrian activity and the creation of a cohesive social experience. The Proposed Project would be consistent with this objective.

Objective	Project Consistency Analysis
To develop and implement public art into the urban fabric, integrating art into both public and private developments.	**Consistent.** Although the Proposed Project would not include public art, the Proposed Project would improve the urban fabric with a well-designed, pedestrian oriented development. The Proposed Project would be designed with the guidance of the Department of City Planning and applicable guidelines and plans. Thus, the Proposed Project would be consistent with this objective.
To preserve key landmarks which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth with distinction, and facilitating the adaptive reuse of structures of architectural, historic or cultural merit.	**Consistent.** Seven commercial/retail buildings currently occupy the Project Site. The existing structures are not considered historic structures/resources pursuant to CEQA. As such, the Proposed Project would not destroy or demolish key landmarks and historical or unique features of the City.
To provide a full range of employment opportunities for persons of all income levels.	**Consistent.** The Proposed Project would be consistent with this objective, as it would provide ground-floor commercial space, which may include retail and creative office spaces. This would introduce new employment opportunities into the area. As such, the Proposed Project would be consistent with this objective.
To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City's low- and moderate-income housing available to residents of the area.	**Consistent.** The Proposed Project's mixed-use design locates multi-family residential units near many employment opportunities. Additionally, the ground-floor commercial element provides additional employment opportunities in the Downtown area. The Proposed Project would also set aside eleven percent of the base residential units as very low-income units. The Proposed Project's residential units and employment opportunities would be available to all ethnic, social, and economic groups without discrimination. As such, the Proposed Project would be consistent with this objective.
To provide the public and social services and facilities necessary to address the needs of the various social, medical and economic problems of Central City residents and to minimize the overconcentration or exclusive concentration of such services within the Project Area.	**Consistent.** This objective is not specifically applicable to the Proposed Project. The Proposed Project has been designed and developed with the guidance of the Department of City Planning, and other necessary City departments. The Proposed Project does not directly propose any public or social services and facilities.
To establish an atmosphere of cooperation among residents, workers, developers, business, special interest groups and public agencies in the implementation of this Plan.	**Consistent.** This objective is directed toward City goals and is not specifically applicable to the Proposed Project. The Proposed Project would be designed and developed with the guidance of the Department of City Planning, and other necessary City departments. Additionally, the Proposed Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site. As such, the Proposed Project would be consistent with this objective.

Notes:
1. "Plan" used within this table means the City Center Redevelopment Plan.
Source: City of Los Angeles, Redevelopment Plan For the City Center Redevelopment Project (Ordinance No. 174593), May 15, 2002.
Parker Environmental Consultants, 2017.

In addition to the overall objectives of the Redevelopment Plan, above, the Redevelopment Plan establishes five criteria for residential uses within commercial areas, which includes mixed-use commercial and residential in a commercial zone. These criteria are:

1. Promote community revitalization;
2. Promote the goals and objectives of the Plan;
3. Be compatible with and appropriate for the Commercial uses in the vicinity;
4. Include amenities which are appropriate to the size and type of housing units proposed; and
5. Meet design and location criteria required by the [Community Redevelopment] Agency.

The Proposed Project would be consistent with the criteria for residential uses in commercial areas. The Proposed Project would revitalize an underutilized lot with the development of an eight-story mixed-use building with residential units and ground-floor neighborhood-serving commercial space. The Proposed Project's land uses are consistent with the surrounding neighborhood that is highly characterized by commercial buildings. Additionally, with the approval of the entitlement requests, the Proposed Project would be consistent with the Project Site's zoning (C2-4D) and land use designation (Regional Center Commercial). As such, the Proposed Project is compatible and appropriate for the commercial land uses located in the vicinity of the Project Site. Further, the Proposed Project would provide approximately 36,650 square feet of open space for the future residents, which includes 12,350 square feet of private balconies/patios and 24,300 square feet in common open space. On-site amenities would include: a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, private decks, clubroom, two lounge rooms and two street plazas that would be open to the public. The Proposed Project would be consistent with the LAMC requirements for open space. Thus, the Proposed Project would include amenities, which are appropriate to the size and type of housing proposed. The Redevelopment Plan refers to the Downtown Design Guide for guidance in building design. The proposed building is designed with the guidance of this document (further discussed below). The Proposed Project meets the design and location criteria required by the Community Redevelopment Agency and applicable guiding documents. Therefore, the Proposed Project would be consistent with the Redevelopment Plan's criteria for mixed-use development and overall objectives (discussed in Table III-11).

Downtown Design Guide: City of Los Angeles

The Downtown Design Guide guides the proposed building's architectural design and sitting, including: sidewalks and setbacks, ground floor treatment, parking and access, massing and street wall design, on-site open space, architectural design, and signage. As discussed earlier, the application of Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Proposed Project is a mixed-use residential project on an infill site within a transit priority area. While Section 21009 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. The City's Downtown Design Guide has been adopted by the City to guide its design review of projects as part of Site Plan Review.

The Downtown Design Guide: City of Los Angeles encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public right-of-ways, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, public art, and promote civic and cultural life. Additionally, the Downtown Design Guide identifies design principles for creating a livable downtown; these principles include:

- *Employment Opportunities.* Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of a sustainable Downtown.
- *Housing Choices.* Provide a range of housing types and price levels that offer a full range of choices, including home ownership, and bring people of diverse ages, ethnicities, household sizes and income into daily interaction.
- *Transportation Choices.* Enable people to move around easily on foot, bicycle, transit, or auto. Accommodate cars but fewer than in the suburbs and allow people to live easily without one.
- *Shops and Services Within Walking Distance.* Provide shops and services for everyday needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.
- *Safe, Shared Streets.* Design Streets not just for vehicles, but as usable outdoor space for walking, bicycling and visual enjoyment.
- *Gathering Places.* Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, that are combined with shops and services. Program places for events and gatherings.
- *Active Recreation Areas.* Provide adequate public recreational open space, including joint use open space, within walking distance of residents.
- *A Rich Cultural Environment.* Integrate public art and contribute to the civic and cultural life of the City.

The Proposed Project would redevelop an underutilized site in an area largely characterized by commercial land uses. The Proposed Project includes the development of a mixed-use building that would contain ground-floor retail/creative office and residential units on levels two through eight. The Proposed Project would increase employment opportunities with its ground-floor commercial component. The Proposed Project would also be increasing the concentration of employment opportunities downtown and placing residents within walking distance of many employment opportunities, shops, and services. The Proposed Project's location would reduce dependence on single-occupancy vehicles and promote walking and alternative transportation. The Proposed Project would reserve eleven percent of its base density units as very low-income units, and all units would be available to all persons without discrimination. The Proposed Project would directly increase housing choices in downtown Los Angeles. With approval of the discretionary requests, the Proposed Project would provide adequate open space and residential amenities. The Proposed Project may include but is not limited to, a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, clubroom, two lunge rooms and private decks. Additionally, the Proposed Project would include public plazas and commercial uses that would face toward the public right-of-way, which would promote a pedestrian environment, activate the sidewalk, and provide socializing opportunities. The Proposed Project would support the Downtown Design

Guide's principles of on-site recreation opportunities and gathering palaces. The Proposed Project would directly support and promote the first four principles and the sixth and seventh principle (pertaining to open space) of the Downtown Design Guide.

Project Site access and driveway design would be designed and developed in consultation with the Los Angeles Department of Transportation, Department of Building and Safety, and the Los Angeles Fire Department, as required. Although the principle relating to safe and shared streets is not directly applicable to the Proposed Project, the Proposed Project would not conflict with this principle. The Proposed Project would provide ground-floor commercial uses that would front Main Street and 11th Street and would support a pedestrian environment, which would help support civic and cultural life. Additionally, the Project Site is would be well designed and landscaped and would further enrich the community identity within Downtown Los Angeles. The Proposed Project would not conflict with this principle.

The Proposed Project would be designed to support the applicable design guidelines identified in the Downtown Design Guide. The Proposed Project would provide ground-floor commercial uses that would front public right-of-ways. Ground-floor design and treatment (such as providing large storefront windows, two pedestrian plazas, and beautifying the public right-of-way with street trees and landscaping) would promote pedestrian activity along Main Street and 11th Street. Additionally, the Proposed Project is visually consistent and compatible with the surrounding buildings along Main Street and 11th Street by providing an approximately 2-foot setback along S. Main Street and E. 11th Street as a dedication preserving the street wall. Primary vehicular access for residential and commercial uses would be provided via a full-access driveway from the alley, which would provide a connection to the subterranean garage. Additionally, commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways. A secondary, limited-access driveway would intersect the east side of Main Street, north of 12th Street. Parking for the Proposed Project would primarily be subterranean and hidden from view. The Proposed Project's building siting, parking and access, architectural design, and materials would support the Downtown Design Guidelines. The Proposed Project would support the applicable principles and design criteria of the Downtown Design Guide.

Los Angeles Municipal Code

Zoning and General Plan Land Use Designations

The Project Site is located within the City of Los Angeles, which is subject to the requirements in the Los Angeles Municipal Code (LAMC). The Project Site consists of approximately 68,342 square feet of lot area (1.57 acres). The Project Site is currently improved with seven commercial/retail buildings. The Proposed Project includes the construction of an eight-story mixed-use building with up to 379 residential dwelling units and 25,810 square feet of ground-floor commercial spaces. The Proposed Project is not currently consistent with the existing zoning and General Plan Land Use designations on-site, which are M2-2D and light manufacturing, respectively. As such, the Applicant seeks a General Plan Amendment from Light Manufacturing to Regional Center Commercial and a vesting zone change/height change from M2-2D to C2-4D. The Applicant also requests a Director's Decision for a 10 percent reduction in open space. Approval of these discretionary requests would allow for the proposed mixed-use residential and commercial retail development.

The Proposed Project would be comprised of multi-family residential uses and retail/creative office uses. The Regional Center Commercial land use designation corresponds with the following zones: CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4 zones. As such, the Proposed Project's proposed zone of C2-4D corresponds with the Regional Center Commercial land use designation. Residential uses and proposed commercial sues are permitted on lots zoned for C2 uses and within Regional Center Commercial land use designation. The C2-4D zone and Regional Center Commercial land use designation would be consistent with the zoning and land use designations for the properties to the west of the Project Site (refer to Figure II-2, Zoning and General Plan Land Use Designation, located in Section II, Project Description. With approval of discretionary requests, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Floor Area

The current height designation of "2D" limits FAR on-site to 3:1. With approval of the discretionary action relating to the vesting zone change and height change, the Project Site would be zoned C2-4D. The height designation of "4D" does not specify a building height limit, but limits development to a FAR of 5.3:1.

The Project Site's lot area is approximately 68,342 gross square feet (1.57 acres), before dedication. Further, the Project Site is located within the Greater Downtown Housing Incentive Ordinance (Ord. No. 179,076, Eff. September 23, 2007) area, which redefines "buildable area" to be consistent with "lot area." Therefore, the Project Site is approximately 68,342 square feet and the allowed floor area on-site is 410,052 square feet. The Proposed Project would contain 354,100 square feet, which would result in a FAR of 5.18:1. Thus, the Proposed Project would be consistent with the allowed FAR permitted per the C2-4D zone.

Density

The Project Site is currently zoned M2-2D. The "M2" zoning designation does not limit density on-site for industrial uses or commercial uses. Generally, the "M2" zoning designation does not allow for residential uses, except for dwelling units considered to be an accessory to an industrial use (such as, a dwelling unit for a watchman or caretaker) in which case the dwelling unit would conform to "R4" requirements. With approval of the vesting zone change/height district change, the zoning on-site would be C2-4D. The "C2" zoning designation allows for "R4" residential uses. Pursuant to LAMC Section 12.22 C.3(c) (part of the Greater Downtown Housing Incentive Area), the maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. As such, under the Greater Downtown Housing Incentive, the density requirements and maximum unit per lot area requirements were eliminated. The Project Site would be developed with up to 379 residential units and no guest rooms. The proposed developed within be within the allowable FAR for the Project Site. Thus, the Proposed Project would be consistent with this requirement.

Open Space

As shown in Table II-3 in Section II, Project Description, the Proposed Project would be in compliance with the minimum open space requirements of the LAMC upon approval of a 10% reduction in open space (a discretionary request). The Proposed Project would include approximately 36,650 square feet of open space, which includes 24,300 square feet of common open space and 12,350 square feet of private open space. The total amount of open space required by code, with a 10% reduction, is approximately 36,380 square feet. As part of the open space requirements, the residential component of the Proposed Project includes planting trees at a rate of one tree for every four dwelling units; 95 trees are proposed on-site, which would be consistent with LAMC requirements. Additionally, to facilitate construction of the Proposed Project, the seven street trees fronting the Project Site on S. Main Street will need to be removed and replaced. Street trees will be replaced at a ratio of 2:1, for a minimum of 14 new street trees to be planted along the public right-of way fronting Main Street. The removal and replacement of any public trees within the public right-of way will require review and approval by the City of Los Angeles Board of Public Works, Urban Forestry Division. Thus, with approval of the discretionary request for a 10% reduction in open space, the Proposed Project would be consistent with the open space requirements of the LAMC and land use impacts related to open space would be less than significant.

Parking

As discussed previously in this Section, the Proposed Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, the Proposed Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099.

The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A 4 (p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units with more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1.25) parking spaces for each dwelling unit of more than three (3) habitable rooms. Parking for the residential uses on-site would be provided in three subterranean parking levels.

The Project Site is also located in the Downtown Parking District, which establishes parking for certain non-residential uses. Pursuant to the Downtown Parking District, one (1) parking space is required per 1,000 square feet of commercial uses.

As summarized in Table II-4, in the Project Description Section, the Proposed Project would meet the minimum on-site parking requirements of the LAMC. The Proposed Project would require a total of 384 parking spaces after applying a ten percent reduction pursuant to the Bicycle Ordinance (No. 182,386); required parking would include 358 residential parking spaces and 26 commercial parking spaces. The Proposed Project plans to provide 429 parking spaces, which 358 residential parking spaces for on-site

residences, 26 commercial parking spaces for on site uses, and 45 office parking spaces to serve 110 W, 11th Street.

The Proposed Project would also provide the required amount of on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (No. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 51 short-term bicycle parking spaces and 392 long-term bicycle parking spaces, for a total of 443 bicycle parking spaces. The Proposed Project would provide 443 bicycle spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

Downtown Adaptive Reuse Incentive Area

The purpose of the Adaptive Reuse Ordinance is to facilitate the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units, or visitor-serving facilities. An adaptive reuse project is defined as any change of use to dwelling units, guest rooms, or joint living and working quarters in all or any portion of any eligible building. The Proposed Project would not rehabilitate any portion of the existing buildings on-site, and as such the Proposed Project is not an adaptive reuse project. No further discussion is required with regards to the Adaptive Reuse Ordinance.

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site, and any impacts would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse impact could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in a highly urbanized area, and the Project Site is currently developed with seven commercial/retail buildings. Therefore, the Proposed Project would not have the potential to cause such effects, and no impact would occur.

Cumulative Impacts

No Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses and would not disrupt or divide the physical arrangement of the established community. In addition, it is reasonable to assume that the related projects under consideration would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable since the Proposed Project would not conflict with applicable local or regional plans. The Proposed Project's land use would not create any significant impacts.

XI. MINERAL RESOURCES

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

Less Than Significant Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is not located within an oil field, oil drilling district zone, and a surface mining district zone[37]; however, the Project Site is located within a Mineral Resources Zone 2 (MRZ-2) [38]. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with seven commercial/retail buildings. Development of the Project Site would not block or hinder access or availability of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource and a less than significant impact would occur.

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

Less Than Significant Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. Although the Project Site is located within a MRZ-2 zone, the Project Site is not currently used for the extraction of mineral resources. Historic research also shows that the Project Site has not been historically used for the extraction of mineral resources. Development of the Project Site would not block or hinder access or availability of locally important mineral resources. Therefore, a less than significant impact to locally important mineral resources would occur.

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[37] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Oil field and oil drilling areas in the City of Los Angeles, September 1996.*

[38] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

XII. NOISE

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or

semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[39]

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid

[39] *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[40]

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure III-1, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential and educational uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Noise Monitoring Data, available in the case file, and are summarized below in Table III-12, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table III-12, the ambient noise in the vicinity of the Project Site ranges from 67.1 to 69.9 L_{eq}. The maximum noise level during the three 15-minute recordings was 86.4 dB L_{max} at the intersection of Main Street and 12th Street, where heavy vehicle traffic and pedestrian activity was present. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic during the daytime hours, including cars, motorcycles, buses, and trucks.

Table III-12
Existing Ambient Daytime Noise Levels in Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics[a]		
			L_{eq}	L_{min}	L_{max}
1	On the southeast corner of Main Street and 11th Street	Vehicle traffic, pedestrian activity, buses, and delivery trucks	68.2	58.6	80.6
2	On the west side of Main Street	Vehicle traffic, pedestrian activity, buses, and delivery trucks	67.1	52.4	80.4
3	On the northwest corner of Main Street and 12th Street	Vehicle traffic, pedestrian activity, buses, and delivery trucks	69.9	54.3	86.4

[a] *Noise measurements were taken on Tuesday, October 11, 2016 at each location for a duration of 15 minutes.*
See case file for noise monitoring data sheets.
Parker Environmental Consultants, 2017.

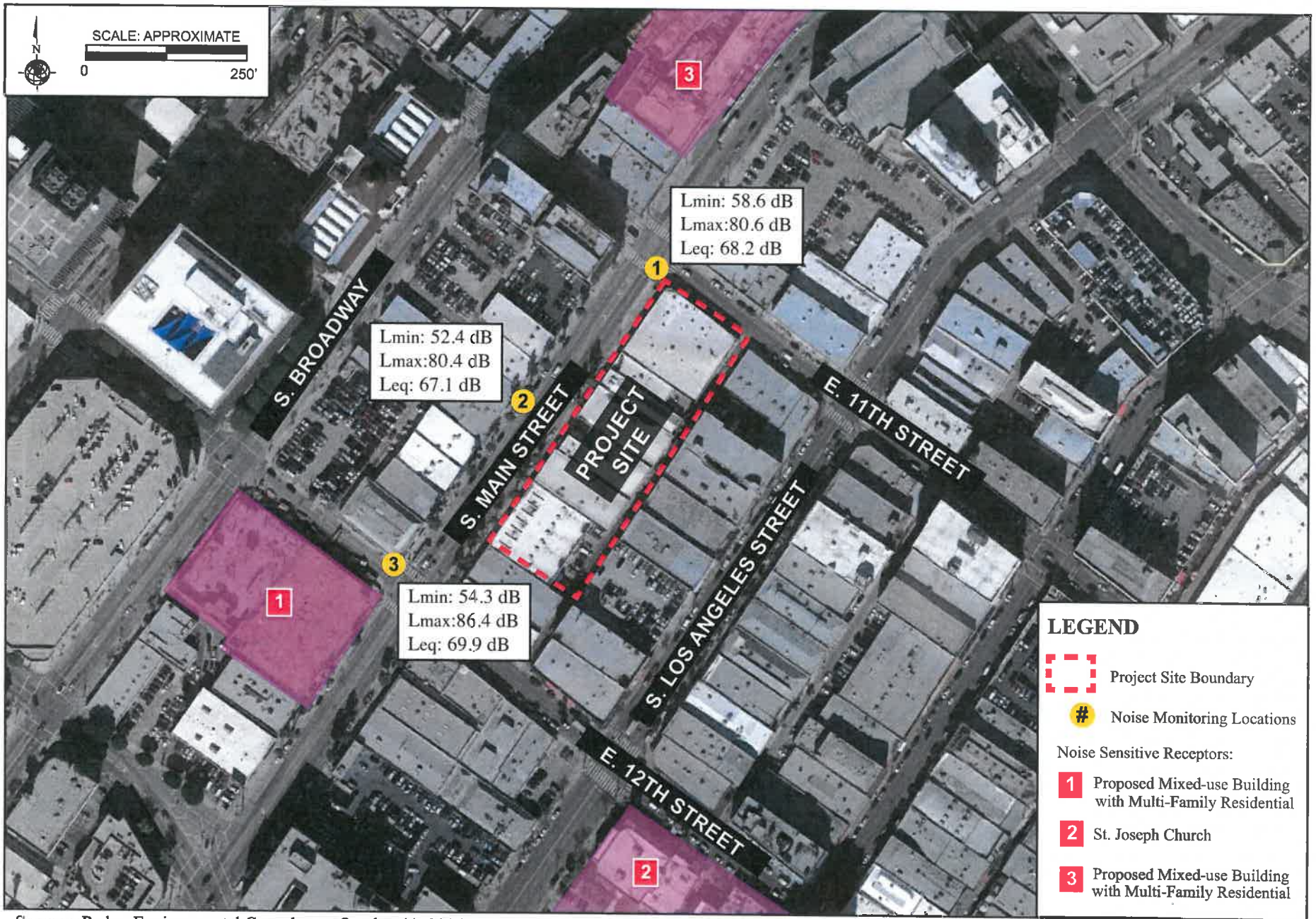
Sensitive Receptors

Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

[40] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

1) 1111 S. Broadway – proposed mixed-use building with multi-family residential;
2) 218 E. 12th Street - Saint Joseph Church; and
3) 928 S. Broadway – proposed mixed-use building with multi-family residential.

The locations of these land uses relative to the Project Site are depicted in Figure III-1, Noise Monitoring and Sensitive Receptor Location Map.



Sources: Parker Environmental Consultants, October 11, 2016; and Google Earth, Aerial View, 2016.

PARKER ENVIRONMENTAL CONSULTANTS

Figure III-1
Noise Monitoring and Sensitive Receptor Location Map

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail, below.

Construction Noise

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other feasible noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the *L.A. CEQA Thresholds Guide* for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading and site preparation, the installation of utilities, paving, and building construction. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table III-13, Typical Outdoor Construction Noise Levels, at a distance of 50 feet from the noise source (i.e., reference distance).

The noise levels shown in Table III-13 represent expected noise levels typically associated with construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could be expected to be 86 dBA L_{eq} when measured at a

reference distance of 50 feet from the center of construction activity.[41] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table III-13, below during the approximate 24-month construction period.

Table III-13
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.
Parker Environmental Consultants, 2017.

As set forth in the *L.A. CEQA Thresholds Guide*, a significant construction noise impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities associated with the proposed development at the Project Site would last for more than ten days in a three-month period, it is possible that the Proposed Project could cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors increase by 5 dBA or more.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 PM

[41] *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday or national holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. In accordance with LAMC Section 112.05, construction noise levels are considered exempt from the 75-dBA noise threshold if all technically feasible noise attenuation measures are implemented.

Table III-14, below, shows the estimated exterior construction noise for the identified sensitive receptors. The ambient exterior noise levels at the identified off-site sensitive receptors would not likely be exceeded by 5 dBA or more on a temporary and intermittent basis during the construction period. Thus, based on criteria established in the *L.A. CEQA Threshold Guide*, no substantial temporary or periodic increase in ambient noise levels would occur at the identified off-site sensitive receptors. Therefore, based on the provisions set forth in LAMC 112.05, temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels.

Table III-14
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

Receptor	Address/Sensitive Land Use	Distance to Project Site (feet)	Existing Exterior Ambient Noise Levels (dBA L_{eq})	Estimated Construction Noise Levels (dBA L_{eq})	Noise Level Increase (dBA L_{eq})
1	Proposed mixed-use building with residential 1111 S. Broadway	210	69.9	73.5	3.6
2	Saint Joseph Church 218 E. 12th Street	365	69.9	68.7	-- [a]
3	Proposed mixed-use building with residential 928 S. Broadway	230	68.2	72.7	4.5

See Figure III-1, Noise Monitoring and Sensitive Receptor Location Map.
[a] *The construction activities would not increase the ambient noise level at Saint Joseph Church.*
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.
Parker Environmental Consultants, 2017.

Noise from Mixed Use Commercial and Residential Land Uses

Due to the mixed-use nature of the Proposed Project, noise generated from the operation of proposed commercial uses on the ground floor have the potential to impact the proposed residential uses. In order to ensure that on-site residences would not be adversely impacted by ambient urban noise levels, the Proposed Project would be constructed in accordance with Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413. The Proposed Project would further comply with the California Green Building Code requirements for noise exposure. With compliance to regulatory measures, impacts associated with interior noise levels at the proposed residences would be less than significant. Additionally, the proposed mid-block plaza and retail corner plaza would not include programmed uses, such as amplified sound or speakers. Therefore noise generated by these uses would be typical of common outdoor spaces in urbanized areas.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Unless Mitigation Incorporated. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle

velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the Caltrans adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table III-15, below.

Table III-15
Vibration Damage Potential Threshold Criteria

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.		

For purposes of addressing vibration impacts relative to human annoyance, the following analysis relies on the FTA's vibration impact thresholds, which are 80 VdB and above at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB and above at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table III-16, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table III-16, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table III-16
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.										

Structural Vibration Impacts

In terms of construction vibration impacts on buildings, the commercial structure immediately adjacent to the south of the Project Site, located at 1150-1156 S. Main Street (an old building) and the commercial structures across the alleyway to the east of the Project Site, would be susceptible to groundborne vibration during the construction phase. As shown in Table III-16, construction activities involving loaded trucks would have an approximate PPV of 0.089 PPV (in/sec) within 25 feet from the source. Application of the Caltrans method indicates that the Proposed Project has the potential to exceed the PPV ground-borne vibration threshold levels set forth in Table III-15, above. Tieback and soldier piles would be employed to protect the buildings during excavation and foundation work. Work generating worst-case PPV levels is also anticipated to be short term in duration. Accordingly, precautionary measures would need to be employed during the construction process to ensure building damage does not occur. Mitigation Measure N-1, below, is therefore recommended to ensure potential structural vibration impacts are mitigated to a less than significant level.

Moreover, protection against damage to adjacent structures is provided by existing law. Both the California Civil Code and the Los Angeles Municipal Code ("LAMC") impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction.

Mitigation Measures:

N-1 Temporary Groundborne Vibration Impacts

- All new construction work shall be performed so as not to adversely impact or cause loss of support to adjacent structures. Pre-construction conditions documentation shall be performed to document conditions of the neighboring adjacent buildings prior to initiating construction activities. The documentation shall consist of video and photographic documentation of accessible and visible areas on the exterior and select interior facades of the buildings immediately bordering the Project Site. A registered civil engineer or certified engineering geologist shall develop recommendations for the adjacent structure monitoring program that will include, but not be limited to, vibration monitoring, elevation and lateral monitoring points, crack monitors and other instrumentation deemed necessary to protect adjacent building and structure from construction-related damage. The monitoring program shall include vertical and horizontal movement, as well as vibration thresholds. If vibration thresholds of 0.3 PPV for continuous/frequent intermittent sources, and 0.5 PPV for transient sources, are met or exceeded, work will stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent structures.

Vibration Annoyance Impacts

In terms of human annoyance resulting from vibration generated during construction, future residents in the residential properties previously identified and the churchgoers of St. Joseph Church could be exposed to increased vibration levels on a temporary and intermittent basis during the construction period. However, due to the distances of these sensitive receptors to the Project Site, the future residents and churchgoers would not experience vibration impacts above the 80 VdB threshold for residents and the 83 VdB threshold for institutional buildings (including churches) from the Proposed Project's construction. Additionally, the surrounding buildings shielding these sensitive receptors from the Project Site would also help to attenuate groundborne vibration. Because any vibration level increases experienced at the residential uses in close proximity to the Project Site would not exceed the vibration thresholds and would only occur on a temporary and intermittent basis during the construction period, impacts associated with groundborne vibration would be considered less than significant.

Operation

The Proposed Project is a mixed-use development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on Main Street and 11th Street, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* for operational noise impacts, a project would normally have a significant impact on noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table III-17, Community Noise Exposure (CNEL), to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table III-17
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*

[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*

[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*

[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Operational Noise

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed residences at the Project Site. As discussed in Question XII(a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial

permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

Parking Noise

No driveways currently allow vehicular access into the Project Site. The Proposed Project would be adding a vehicle driveway along Main Street to provide access to the subterranean parking areas of the Proposed Project. An entrance driveway and exit driveway for the retail uses would be located along the alleyway. Activities within the designated parking structure areas associated with the Proposed Project would have the potential to increase ambient noise levels in the area. Sources of noise within the parking areas would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels associated with the residential parking levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. However, any parking noise that may be audible from outside of the parking areas would be insulated and contained within the subterranean parking levels of the Proposed Project. With respect to the ground level commercial parking along the alleyway, activities and noise levels would only be limited to operational hours during the day and would be contained and enclosed by the ground level parking structure. In addition, operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. The Department of City Planning recommends the driveway ramps be constructed of noise-attenuating materials such as concrete surfaces. With implementation of Mitigation Measure N-2, noise impacts associated with the Proposed Project's parking garage would ensure operational noise impacts are reduced to less than significant.

Mitigation Measure:

N-2 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.

Traffic Noise

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Transportation Impact Study, the proposed development would result in a net increase of 385 daily vehicle trips, including 112 AM peak hour trips and 92 PM peak hour trips. Based on a comparison of the Proposed Project's peak hour trips compared to the existing traffic volumes at the 10 study intersections, the Proposed Project would not have the potential to double the traffic volumes on any study intersection in

the vicinity of the Project Site. As such, the Proposed Project would not have the potential to increase roadway noise levels by 3 dBA, and thus traffic generated noise impacts would be considered less than significant.

To quantify the increase of the ambient noise levels at the 10 study intersections from the Proposed Project, traffic noise was modeled using the California Department of Transportation, Technical Noise Supplement (2009). Traffic noise was modeled under the Existing (2017) "No Project" and "Existing (2017) Plus Project" scenarios to determine the environmental baseline and Project impact, respectively. The changes in future noise levels associated with the Proposed Project at locations in the surrounding intersections in the Project vicinity where sensitive receptors are located are identified in Table III-18, below, Proposed Project Noise Impacts at Study Intersections.

As shown in Table III-18, the Proposed Project would increase local noise levels by a maximum of 0.21 dBA CNEL at the intersection of Main Street and 11th Street during the AM peak hour, which would be inaudible/imperceptible to most people and would not exceed the 3-dBA CNEL threshold of significance. The remaining street intersections analyzed would all experience a 0.10 dBA CNEL increase or less. Thus, the Proposed Project's mobile noise impacts would not exceed the 3 dBA CNEL threshold, set forth in the *L.A. CEQA Thresholds Guide*, and the Proposed Project's mobile source noise impact would be less than significant.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. In addition, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

As discussed above, impacts are expected to be reduced to less than significant levels for construction vibration and operational noise. Implementation of Mitigation Measures N-1 and N-2 would ensure the Proposed Project would not result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity, and these impacts would be reduced to less than significant.

Table III-18
Proposed Project Noise Impacts at Study Intersections

Street Intersection	Peak Hour	Noise Levels in dBA CNEL			
		Existing (2017) Without Project Traffic Volumes	Existing (2017) with Project Traffic Volumes	Increase	Significant Impact?
1. Hill Street & Olympic Boulevard	AM	68.20	68.24	0.04	No
	PM	68.20	68.25	0.05	No
2. Broadway & Olympic Boulevard	AM	68.20	68.25	0.05	No
	PM	68.20	68.25	0.05	No
3. Broadway & 11th Street	AM	68.20	68.24	0.04	No
	PM	68.20	68.18	-0.02	No
4. Main Street and 9th Street	AM	68.20	68.27	0.07	No
	PM	68.20	68.23	0.03	No
5. Main Street & Olympic Boulevard	AM	68.20	68.30	0.10	No
	PM	68.20	68.27	0.07	No
6. Main Street & 11th Street	AM	68.20	68.41	0.21	No
	PM	68.20	68.25	0.05	No
7. Main Street & 12th Street	AM	69.90	69.90	0.00	No
	PM	69.90	69.96	0.06	No
8. Main Street & Pico Boulevard	AM	69.90	69.91	0.01	No
	PM	69.90	69.94	0.04	No
9. Los Angeles Street & Olympic Boulevard	AM	68.20	68.22	0.02	No
	PM	68.20	68.28	0.08	No
10. Los Angeles Street & 11th Street	AM	68.20	68.22	0.02	No
	PM	68.20	68.28	0.08	No

Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Nov. 2009) formula for adding and subtracting equal sound pressure levels. Traffic volumes are based on the Project Traffic Study prepared by Crain & Associates, Traffic Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, dated February 9, 2017.
Parker Environmental Consultants, 2017.

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

No Impact. A significant impact may occur if the Proposed 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 in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The closest airport is the Los Angeles International Airport (LAX), which is located approximately 16 miles west of the Project Site. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. The closest private airstrip is the Bob Hope Airport, located in Burbank approximately 17 miles north of the Project Site. As no such facilities are located in the vicinity of the Project Site, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 108 related projects identified in Section II, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced with feasible mitigation.

With respect to cumulative traffic noise impacts, it should be noted that the Proposed Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Study. Thus, the future predicted noise levels include the traffic volumes from the Proposed Project and future traffic levels associated with ambient growth and the related projects are shown in Table III-19, Cumulative Noise Impacts at Study Intersections. The highest increase in local noise levels shows a maximum of 2.16 dBA CNEL at the intersection of Broadway and 11th Street during the AM peak hour, which would not exceed the 3 dBA CNEL threshold of significance. As such, the Proposed Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Table III-19
Cumulative Noise Impacts at Study Intersections

Street Intersection	Peak Hour	Noise Levels in dBA CNEL			
		Existing (2017) Without Project Traffic Volumes	Future (2021) with Project Traffic Volumes	Increase	Significant Impact?
1. Hill Street & Olympic Boulevard	AM	68.20	69.35	1.15	No
	PM	68.20	69.64	1.44	No
2. Broadway & Olympic Boulevard	AM	68.20	69.24	1.04	No
	PM	68.20	69.41	1.21	No
3. Broadway & 11th Street	AM	68.20	70.36	2.16	No
	PM	68.20	69.16	0.96	No
4. Main Street and 9th Street	AM	68.20	69.55	1.35	No
	PM	68.20	69.50	1.30	No
5. Main Street & Olympic Boulevard	AM	68.20	69.36	1.16	No
	PM	68.20	69.51	1.31	No
6. Main Street & 11th Street	AM	68.20	69.75	1.55	No
	PM	68.20	69.50	1.30	No
7. Main Street & 12th Street	AM	69.90	71.17	1.27	No
	PM	69.90	71.20	1.30	No
8. Main Street & Pico Boulevard	AM	69.90	71.08	1.18	No
	PM	69.90	71.21	1.31	No
9. Los Angeles Street & Olympic Boulevard	AM	68.20	69.36	1.16	No
	PM	68.20	69.47	1.27	No
10. 10. Los Angeles Street & 11th Street	AM	68.20	69.39	1.19	No
	PM	68.20	69.25	1.05	No

Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Nov. 2009) formula for adding and subtracting equal sound pressure levels. Traffic volumes are based on the Project Traffic Study prepared by Crain & Associates, Traffic Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, dated February 9, 2017.
Parker Environmental Consultants, 2017.

XIII. POPULATION AND HOUSING

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

Less Than Significant Impact. A significant impact may occur if the proposed project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

In October 2008, SCAG approved and adopted the "2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future" (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality of life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region's adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region's mobility, livability, and prosperity for future generations.

RCP Vision

To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.

RCP Guiding Principles

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region's mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016-2040 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals.

Based on the regional growth projections in the 2016-2040 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons and approximately 1,325,500 residences in 2012. By the year 2040, SCAG forecasts that the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) and approximately 1,690,300 residences (or a 28% increase since the year 2012). SCAG's population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2012 and 2040 are further summarized in Table III-20, below.

On a policy level, the Proposed Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above, as the Proposed Project would revitalize an underutilized, developed property in an existing commercial area. The Proposed Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.6 million persons by 2040. As shown in Table III-20, SCAG population and housing projections from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) in the City of Los Angeles and 3,816,000 additional persons (an approximate 21% growth rate) in the entire SCAG Region. The number of households within the City is Los Angeles is anticipated to increase by 364,800 households, or approximately 28% between 2012 and 2040. The number of households within the SCAG Region is anticipated to increase by 1,527,000 households, or approximately 26% between 2012 and 2040. The number of employment opportunities is anticipated to increase by 472,700 jobs (approximately 28%) in the City of Los Angeles between 2012 and 2040, and the SCAG Region is anticipated to increase by 2,432,000 jobs (approximately 33%) between 2012 and 2040.

Table III-20
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	3,845,500	4,609,400	20%
Los Angeles County [b]	9,923,000	11,514,000	16%
SCAG Region [b]	18,322,000	22,138,000	21%
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,325,500	1,690,300	28%
Los Angeles County [b]	3,257,000	3,946,000	21%
SCAG Region [b]	5,885,000	7,412,000	26%
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City [a]	1,696,400	2,169,100	28%
Los Angeles County [b]	4,246,000	5,226,000	23%
SCAG Region [b]	7,440,000	9,872,000	33%

Source: SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.

Based on the community's current household demographics (e.g., an average of 1.53 persons per multi-family household for the Central City Community Plan area ("Central City CPA")), the construction of 379 additional residential dwelling units would result in an increase in approximately 580 net permanent residents in the City of Los Angeles.[42] Further, the Proposed Project includes approximately 25,810 square feet of retail/creative office space. The Proposed Project would generate the need of approximately 67 employees.[43] The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households, approximately 763,900 persons, and 472,700 jobs in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the

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[42] *Based on a generation rate of 1.53 residents per multi-family dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Central City Community Plan Area, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=CCy&sgo=ct&rpt=PnH&yrx=Y09, accessed February 2017.*

[43] *One employee would occupy approximately 228 square feet of office space, and one employee would occupy approximately 588 square feet of retail space. Source: United States Green Building Council, Building Area Per Employee by Business Type, May 13, 2008.*

year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

According to the Department of City Planning, the Community Plan projected a population of 27,029 persons and 16,457 dwelling units by 2010 within the Community Plan area.[44] The 2010 United States Census shows that the Community Plan area had an actual population of approximately 37,675 persons and 23,054 dwelling units in 2010.[45] The 2010 Census data shows that the actual population and housing stock in the Community Plan area was higher than projected. However, the Community Plan area provides that such figures are only best estimates, are based on forecasts of development (rather than planned capacity), and are derived from regional data which are disaggregated to the City and the community level. The Community Plan area recognizes that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends. Regional forecasts do not always reflect the adopted community plan land use capacity or buildout and is also an estimate based on specific assumptions about future density of development and household size. The Community Plan also notes that community plan capacity does not include housing in commercial districts (such as the commercial district in which the Project Site is located) nor the current residential vacancy rate. The Proposed Project is consistent with the City's goals of increasing mixed-use development Downtown, near retail and services, and within a transit-rich area. As discussed above, the Proposed Project addition of up to 379 dwelling units and 580 net permanent residents is consistent with SCAG's growth projections for the Los Angeles region.

As shown in Table III-21, Proposed Project Employment Growth, the Proposed Project's commercial/retail component would generate the need for approximately 67 new employees. When considering the existing uses on-site, the development of the Proposed Project would decrease the number of employees in the area. Thus, the resulting employment of the Proposed Project would within SCAG's employment growth forecast. The additional employees generated by the Proposed Project would contribute to a fraction of 1 percent of SCAG's employment growth forecast for the City of Los Angeles. The Proposed Project's commercial component may result in indirect population growth with new employees relocating to the City of Los Angeles. However, it can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. The new 67 employees would be consistent with SCAG's growth projections for the Los Angeles region. Therefore, impacts related to direct population growth in the area would be less than significant.

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[44] *City of Los Angeles Department of City Planning, Central City Community Plan, pg. II-3.*

[45] *City of Los Angeles Department of City Planning, 2015 Growth and Infrastructure Report, November 1, 2016.*

Table III-21
Proposed Project Employment Growth

Use	Amount	Employment Generation Factor [a]	Number of Employees
Existing Conditions			
Commercial/Retail	58,220 sf	1 employee / 383 sf	152
		Total Existing Employees:	**152**
Proposed Project			
Creative Office/Retail	25,810 sf	1 employee / 383 sf	67
		Total Proposed Project Employees:	**67**
		NET TOTAL Employment:	**-85**

Notes:
[a] *The employee generation factor for existing and future uses were taken from the United States Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
Parker Environmental Consultants, 2017.

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

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site is developed with seven commercial/retail buildings. No residential units exist on-site. As such, the Proposed Project would not displace any existing housing. Therefore, no impact would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is developed with seven commercial/retail buildings. No residential units exist on-site. Therefore, development of the Proposed Project would not displace any residents, since none exist on-site. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area. As shown in Table III-22, the Proposed Project and related projects that involve residential developments would cumulatively contribute 29,137 new residential dwelling units to the Central City Community Plan area, generating approximately 44,580 new residents.

Table III-22
Estimated Cumulative Residents and Housing Units

Related Projects (By Housing Type)	Total Housing Units	Total Residents[a]
Apartments	19,004	29,076
Condominiums	9,754	14,924
Related Projects Total:	**28,758**	**44,000**
Proposed Project Net Total:	379	580
Cumulative Total:	**29,137**	**44,580**

Source: Based on a generation rate of 1.53 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Central City Community Plan Area, website: http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=CCy&sgo=ct&rpt=PnH&yrx=Y09, accessed February 2017.
Parker Environmental Consultants, 2017.

As discussed in Question XIII(a), the Proposed Project would not exceed the growth projections of SCAG's 2016-2040 RTP/SCS for the City of Los Angeles subregion. Because the Proposed Project would not displace any residents, and population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

As shown in Table III-23, below, related projects in the City of Los Angeles in conjunction with the Proposed Project would generate approximately 24,860 employees. It is important to note that this estimate is conservative and does not take into account any current employment on the related project sites or any infill related projects. In the 2016-2040 RTP/SCS, SCAG forecasts that the City's employment would increase by approximately 472,700 additional jobs between the years 2012 and 2040. The addition of 24,860 employees would represent approximately 5.3 percent of SCAG's citywide employment growth projections during the 2012 to 2040 timeframe. The estimated 24,860 new employees would be within SCAG's employment projections within the City and the SCAG regions. Therefore, the impacts to cumulative employment growth would be less than significant.

With respect to population growth from permanent employment, jobs in commercial/retail land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

Table III-23
Estimated Cumulative Employee Generation

Related Project Land Use [a]	Size	Employment Generation Rates [b]	Total Employees [c]
Retail	2,239,379 sf	1 employee / 383 sf	5,847
Elementary School	31,940 sf	1 employee / 1,250 sf	26
College	682,344 sf	1 employee / 1,587 sf	430
Fast Food Restaurant	4,700 sf	1 employee / 70 sf	67
Grocery Store	220,120 sf	1 employee / 938 sf	235
Bar/High Turnover Restaurant	54,371 sf	1 employee / 100 sf	544
Hotel	2,666,275 sf	1 employee / 1,124 sf	2,372
Medical Building	111,385 sf	1 employee / 207 sf	538
Office	2,824,346 sf	1 employee / 228 sf	12,387
Restaurant	314,499 sf	1 employee / 134 sf	2,347
		Related Projects Subtotal:	***24,793***
		Proposed Project Total:	*67*
		NET New Employees:	**24,860**

Notes:
[a] *Related Project number as identified on Table II-6, Related Projects List. Uses not listed in the Related Projects List are closest to the uses listed in this table.*
[b] *Employment rates based on U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*
[c] *This number is conservative and does not take into consideration any infill development projects and any current employees on any related project sites.*
Parker Environmental Consultants, 2017.

XIV. PUBLIC SERVICES

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

(i) Fire protection?

Less Than Significant Impact.

Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project. The BMPs that would be implemented during construction of the Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete.

Operation

Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If the distance is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance.

The Proposed Project would include up to 379 dwelling units and up to 25,810 square feet of ground floor retail/restaurant and would generate approximately 580 new residents and 67 employees. The Proposed Project would increase the utilization of the Project Site, which is currently used as seven commercial/retail buildings, and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 10, located at 1335 S. Olive Street, which is approximately 0.6 mile southwest of the Project Site, directly across on Olive Street. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 10 to the Project Site, fire protection response would be considered adequate.

The Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the Proposed Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or the approval of

a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 108 related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur.[46] On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

(ii) Police Protection?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if the construction or operation of a new facility results in a physical adverse impact upon the environment.

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[46] *Crain & Associates, Traffic Impact Study for the Proposed 1100 S. Main Street Mixes-Use Project, City of Los Angeles, January 30, 2017.*

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Proposed Project would include up to 379 dwelling units and up to 25,810 square feet of ground floor retail/restaurant and would generate approximately 580 new residents and 67 employees. The Proposed Project would increase the utilization of the Project Site, which is currently used as seven commercial/retail buildings, and would potentially increase the demand for LAPD services. The Project Site is located in the Central Area division of the LAPD's Central Bureau. The Project Site is served by the Central Community Police Station located at 251 E. 6th Street, which is approximately 0.8 mile northeast of the Project Site. Table III-24, Central Area Police Station Crime Statistics, provides crime statistics for Central City area in the City of Los Angeles.

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. The Proposed Project would incorporate temporary construction fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area (refer to Mitigation Measure PS-1, below).

The development of the Proposed Project would result in an increase of on-site residents, visitors, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project guests and employees would be able to monitor suspicious activity at the building entry points (refer to Mitigation Measure PS-2, below). Additionally, the Proposed Project would be monitored by private security during both construction and operation and would contribute to the Fashion District Business Improvement District (BID). The LA Fashion District BID is a non-profit organization that provides cleaning, safety and marketing programs

to the designated BID area.[47] With implementation of Mitigation Measure PS-1, PS-2 and PS-3, provided below, the Proposed Project's impacts upon LAPD services would be less than significant.

Table III-24
Central Area Police Station Crime Statistics

Crimes	2017 (YTD) [a]	2016 (YTD)	2015 (YTD)
Violent Crimes			
Homicide	5	1	2
Rape	10	8	10
Robbery	72	76	58
Aggravated Assault	60	71	82
Total Violent Crimes	**147**	**156**	**152**
Property Crimes			
Burglary	39	33	36
Motor Vehicle Theft	49	35	23
BTFV	112	95	84
Personal / Other Theft	237	207	233
Total Property Crimes	**3,294**	**3,197**	**2,517**
Total Part 1 Crimes	**584**	**526**	**528**
Child / Spousal Abuse (Part I & II) [b]	50	46	43
Shots Fired	6	3	6
Shooting Victims	1	1	1

Notes: YTD = year to date
[a] *Crime Statistics for week ending February 4, 2017.*
[b] *Part II Child/Spousal Abuse Simple Assaults not included in Part 1 Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.*

Source: LAPD, COMPSTAT Unit, Central City Area Profile, accessed February 2017.
Parker Environmental Consultants, 2017.

[47] *LA Fashion District BID, About Us, website: http://fashiondistrict.org/la-fashion-district-bid/us/, accessed February 2017.*

Mitigation Measure:

PS-1 Public Services (Police – Demolition/Construction Sites)

- Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PS-2 Public Services (Police)

- The plans shall incorporate the design features (outlined in LAPD's "Design Out Crime Guidelines: Crime Prevention Through Environmental Design") relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

PS-3 On-Site Security

- The Property Owner shall provide private on-site security during construction and operation of the Proposed Project. The Property Owner shall contribute to the Fashion District Business Improvement District, which provides cleaning and safety services to the designated BID area.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 108 related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be

subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site.[48] No impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

(iii) 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, 5, and 7. The Project Site is currently served by two elementary schools, one middle school, and four high schools. Table III-25, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

Table III-25
Resident Schools Serving the Project Site

School Name	Grades	Address
9th Street Elementary	K-5	835 Stanford Avenue
John Adams Middle School	6-8	151 W. 30th Street
Nava College Preparatory Academy	9-11	1319 E. 41st Street
Thomas Jefferson Senior High	9-12	1319 E. 41st Street
Dr. Maya Angelou Community High School	9-12	300 E. 53rd Street
Santee Education Complex	9-12	1921 S. Maple Avenue

Notes: Some schools are charter schools and require an application process prior to student enrollment.
Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed February 2017.
Parker Environmental Consultants, 2017.

As shown in Table III-26, Proposed Project Estimated Student Generation, the Proposed Project would generate almost 62 elementary students, 17 middle school students and 36 high school students, for a total of approximately 115 students. As shown in Table III-27, with the exception of 9th Street Elementary schools serving the Project Site have available capacity and would be able to accommodate the additional students generated by the Proposed Project. However, the Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.

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[48] *Crain & Associates, Traffic Impact Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, January 30, 2017.*

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 108 related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. As shown in Table III-28, Projected Cumulative Student Generation, the Proposed Project and related projects would cumulatively contribute approximately 3,860 elementary school students, 1,082 middle school students and 2,190 high school students, for a total of 7,132 students. This would create an increased cumulative demand on local school districts. As shown in Table II-6, Related Projects List, in Section II. Project Description, there are two proposed schools in the Project vicinity, a charter school designed for 480 students and an elementary school with a capacity for 460 students (Related Project No. 80 and 90, respectively). The addition of these schools would reduce the demand of schools in the area. Further, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

Table III-26
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Existing Project					
Retail/Commercial [a]	58,220	1	0	0	1
Total Existing Students:		**1**	**0**	**0**	**1**
Proposed Project					
Multi-Family [b]	379 du	63	17	36	116
Creative Office/Retail [a]	25,810 sf	0	0	0	0
Total Project Student Generation:		**63**	**17**	**36**	**116**
Less Existing Students:		*-1*	*0*	*0*	*-1*
NET Student Generation:		**62**	**17**	**36**	**115**

Notes: sf = square feet; du = dwelling units
[a] *Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.*
[b] *Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.*
Sources:
For bullet points (a) and (b) above: Los Angeles Unified School District, School Fee Justification Study, September 2002.
For bullet points (c) above: Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.
Parker Environmental Consultants, 2017.

Table III-27
Student Capacity at Schools Serving the Project Site

Schools Serving the Project Site [a]	Grades	2015 – 2016 Student Enrollment [b]	Seat Capacity [b]	Available Seats
9th Street Elementary	K-5	302	328	26
John Adams Middle School	6-8	885	957	72
Nava College Preparatory Academy	9-11	496	498	2
Thomas Jefferson Senior High	9-12	823	1,176	353
Dr. Maya Angelou Community High School	9-12	1,120	1,170	50
Santee Education Complex	9-12	1,820	1,932	112

Notes:
[a] Los Angeles Unified School District, Resident School Finder, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed October 2016.
[c] Written Correspondence with LAUSD, Facilities Services Division, November 1, 2016.
Parker Environmental Consultants, 2017.

Table III-28
Estimated Cumulative Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Single-Family Attached [a]	19,004 du	517	141	296	954
Multi-Family Residences [b]	9,754 du	3,134	855	1,792	5,781
Hotel [c]	2,666,275 sf	20	9	9	38
Office [d]	3,655,801 sf	85	40	38	163
Retail/Commercial [e]	2,827,283 sf	42	20	19	81
Related Projects Total:		**3,798**	**1,065**	**2,154**	**7,017**
Proposed Project Net Total:		62	17	36	115
Cumulative Total:		**3,860**	**1,082**	**2,190**	**7,132**

Notes: sf = square feet; du = dwelling units
Uses not listed are estimated by the closest type of use available in the table.
[a] Student generation rates are as follows for single-family attached residential uses: .053 elementary, .0145 middle and .0303 high school students per unit.
[b] Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit.
[c] Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf.
[d] Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.
[e] Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.
Source:
-For bullet points (a) and (b) above: Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.
-For bullet points (c) through (e) above: Los Angeles Unified School District, School Fee Justification Study, September 2002.
-Conversions for square feet per occupant based on California Building Code (2013), Ch.10, Table 1004.1.2.
Parker Environmental Consultants, 2017.

(iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Proposed Project is located within a highly urbanized area within the Central City Community Plan Area. As shown in Table III-29, there over 71 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. These facilities range from 0.33-acres (Unidad Park) to 29.86 acres (MacArthur Park). Notable new additions to the downtown area are Grand Park, at the Los Angeles Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. As discussed in Checklist Question XII (a), it is estimated that the development of the Proposed Project would result in an increase of 580 new residents to the area. Based on the 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 2.32 acres of additional public parkland. The Proposed Project would 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 36,650 square feet (0.84 acres) of total open space and amenities on-site available exclusively to serve Project residents and their guests. The Proposed Project may include a variety of on-

site amenities including, but not limited to, a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, private decks, clubroom, two lounge rooms and two street plazas that would be open to the public. With approval of a 10 percent reduction in open space, the Proposed Project would achieve the required square feet of open space required by the LAMC.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a 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.[49] 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 reduced to a less-than-significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby Fees (for subdivision projects with greater than 50 units) and/or park mitigation fees (for all other residential projects). Residential projects that are vested per Los Angeles Municipal Code Sections 12.24.T.2, 12.26.A.3, 12.32.Q, or 17.15 prior to the effective date of Ordinance 184,505 (January 11, 2017) will not be subject to the Park Fee. Vested entitlement projects will still be subject to applicable Recreation and Park Fee provisions that were effective on the vesting date of the entitlement. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

[49] *Residential projects that are vested per Los Angeles Municipal Code Sections 12.24.T.2, 12.26.A.3, 12.32.Q, or 17.15 prior to the effective date of Ordinance 184,505 (January 11, 2017) will not be subject to the Park Fee. Vested entitlement projects will still be subject to applicable Recreation and Park Fee provisions that were effective on the vesting date of the entitlement.*

Table III-29
Recreation and Park Facilities within the Project Area

Park Name	Size (acres)	Park Amenities	Approx. Distance from Project Site (miles)
1. Grand Hope Park	2.50	Clock tower, open space (lawns), and children's play area	0.35
2. Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	0.66
3. Spring Street Park	0.56	Open space, benches, and children's play area	0.84
4. 6th & Gladys Street Park	0.34	Open space and basketball court	0.92
5. Trinity Recreation Center	2.06	Auditorium, basketball courts (lighted/outdoor), open space, children's play area.	0.94
6. Orthopedic Hospital Universal Access Playground	0.17	Children's playground	1.11
7. Toberman Recreation Center	2.20	Auditorium, barbecue pits, baseball diamond (lighted), children's play area, community room, indoor gym, picnic tables	1.17
8. Central Park Recreational Center and Pool	0.70	Basketball courts (lighted/indoor), children's play area, pool	1.23
9. Saint James Park	0.98	Children's play area, open space	1.26
10. City Hall Park Center	1.20	Open space and benches	1.27
11. Alvarado Terrace Park	0.91	Children's play area and gazebo	1.35
12. Grand Park	12.00	Children's play area, fountain, open space	1.40
13. Hoover Recreation Center	2.46	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	1.43
14. Hope and Peace Park	0.57	Basketball courts and benches	1.44
15. Pico Union Park	0.75	Children's play area, picnic tables	1.46
16. Vista Hermosa Park	2.13	Children's play area, picnic tables, soccer field	1.54
17. Los Angeles Plaza Park (El Pueblo de Los Angeles Monument)	2.60	Open space, benches, museums, and Olvera Street	1.63
18. Mac Arthur Park	29.86	Lake, recreation center, open space, benches, children's play area, auditorium, picnic tables, walking paths, auditorium, class room, and paddle boats	1.65
19. Rockwood Community Park	0.38	Children's play area, benches	1.76
20. Unidad Park (Beverly Park)	0.33	Children's play area, benches	1.76
21. Echo Deep Pool	1.04	Year-round indoor pool which offers various programming	1.78
22. Avalon-San Pedro Park	0.90	Children's play area, benches	1.90
23. Alpine Recreation Center	1.97	Auditorium, basketball courts (lighted/indoor/outdoor), children's play area, indoor gym, volleyball courts	2.00
Total Parkland (Approximate):	**71.05**		

Sources: Park distances, size, and amenities were determined using:
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/;
(2) Navigate LA, http://navigatela.lacity.org/navigatela/; and
(3) Google Earth (when necessary), accessed February 2017..
Parker Environmental Consultants, 2017.

(v) Other Public Facilities?

Less Than Significant Impact. A significant impact may occur if a 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library and 72 regional branch libraries. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Central Library, located at 630 W. 5th Street, approximately 0.8 mile north of the Project Site;
- Little Tokyo Branch, located at 203 S. Los Angeles Street, approximately 1.1 mile northeast of the Project Site;
- Pico Union Branch, located at 1030 S. Alvarado Street, approximately 1.5 miles northwest of the Project Site;
- Chinatown Branch Library, located at 639 N. Hill Street, approximately 1.8 miles north of the Project Site.[50]

The Central Library is approximately 500,000 square feet and has approximately 6.3 million items. It serves approximately 7,000 people a day and maintains a staff of 150 employees. The Library budget ($150.7 million) is 2% of the total city budget ($6.7 billion).[51] In 2011, Measure L, the Public Library Funding Charter Amendment, was approved by over 63% of voters. Measure L provides funds to restore 6-day-a-week service at all 73 libraries, and eventually 7-day-a-week service at 9 libraries, purchase additional books, and increase access to the Library's collections, computers and programs including after-school/summer youth, student homework help, adult literacy and job search programs.[52] Currently, there are no plans to construct any new library facilities in the local area. As such, the Proposed Project's impacts upon library services would be less than significant.

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[50] *City of Los Angeles Public Library, Hours and Locations, website: http://www.lapl.org/branches, accessed February 2017.*

[51] *Los Angeles Public Library, Measure L Fact Sheet, http://www.lapl.org/sites/default/files/media/pdf/about/fact_sheet.pdf accessed February 2017.*

[52] *Ibid.*

Cumulative Impacts

Less Than Significant Impact. Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population, combined with the 580 additional residents generated by the Proposed Project, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[53] Thus, the 580 additional residents generated by the Proposed Project and the related projects would not make a cumulatively considerable impact upon the City's library system. Therefore, the cumulative impacts related to library facilities would be reduced to a less than significant level.

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?

Less Than Significant Impact. For the purpose of this Initial Study/MND, a significant impact may occur if the project would include substantial employment or population growth, which would 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

It is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table III-29, above, there are 23 existing new and

[53] *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

recently improved parks within the Project area totaling more than 71 acres that are available to serve the future residents and retail visitors to the Project Site. Notable new additions to the downtown area are Grand Park, at the Los Angeles Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. In addition, the Proposed Project would provide approximately 36,650 square feet (0.84 acres) of open space and recreational facilities on-site that would be available to serve Project residents and their guests, including two ground-floor plazas open to the public along Main Street. The Proposed Project would include a variety of on-site amenities including, but not limited to, a pool deck, courtyard, rooftop terrace, residential lobby, fitness room, recreation room, private decks, and two public street plazas. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed Project would not substantially 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. In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a 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 based on the amount of on-site open space and recreational amenities provided on-site.[54] 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 reduced to a less-than-significant level. Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

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?

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 23 existing, new, or recently improved parks within the Project Area totaling more than 71 acres that are available to serve the future residents and retail visitors to the Project Site. The Proposed Project would also provide approximately 36,650 square feet of open space and recreational facilities on-site. As discussed in Section XIV (iv) above, Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project itself does not include the expansion of park facilities and does not

[54] *Residential projects that are vested per Los Angeles Municipal Code Sections 12.24.T.2, 12.26.A.3, 12.32.Q, or 17.15 prior to the effective date of Ordinance 184,505 (January 11, 2017) will not be subject to the Park Fee. Vested entitlement projects will still be subject to applicable Recreation and Park Fee provisions that were effective on the vesting date of the entitlement.*

require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. Section 15355 of the State CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." As discussed above, the Proposed Project would have a less than significant impact on recreational resources. The Proposed Project in combination with the 108 related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Similar to the Proposed Project's requirement to pay park mitigation fees to improve recreation and park facilities, the related projects that include residential units would be required to pay similar recreation taxes and/or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

XVI. TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference the information provided in the *Transportation Impact Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles* ("Transportation Study"), provided by Crain & Associates, dated February 9, 2017. The Traffic Study and Department of Transportation Correspondence of Approval to the Planning Department (DOT Case No. CEN 16-44970) dated March 2, 2017.

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

Potentially Significant Unless Mitigation Incorporated. The Traffic Study was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation ("LADOT") Transportation Impact Study Guidelines (December 2016). The analysis is also consistent with the guidelines in the Congestion Management Program (CMP) for Los Angeles County. The Traffic Study analyzed the following: Existing (2017) traffic volumes, Existing (2017) Plus Project traffic volumes, Future (2021) Without Project traffic volumes, and Future (2021) With Project traffic volumes. The analyses of future (2021) conditions included cumulative traffic attributable to ambient growth and related projects within the Project study area.

The LADOT Transportation Impact Study Guidelines (December 2016) require the use of the Critical Movement Analysis (CMA) methodology to analyze signalized intersections for land use development projects. This methodology is based on procedures outlined in the Transportation Research Board Circular 212, Interim Materials on Highway Capacity. Using the CMA procedures, a determination can be made of the operating characteristics of an intersection in terms of the Level of Service for different levels of traffic volume and other variables, such as critical signal phases and the number and type of traffic lanes.

Level of Service

The term "Level of Service" (LOS) describes the quality of traffic flow. LOS A through C are indicative of excellent-to-good traffic flow conditions. LOS D corresponds with fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups. LOS E represents poor conditions, with volumes at or near the capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles. LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

The City of Los Angeles determines whether a transportation impact at a signalized intersection is significant according to a sliding scale. At an intersection with a final LOS C, a project impact would occur if the project contributes 0.040 or greater to the intersection V/C. At an intersection with a final LOS D, a project impact would occur if the project contributes 0.020 or greater to the intersection V/C. At an intersection with a final LOS E or F, a project impact would occur if the project contributes 0.010 or greater to the intersection V/C. Refer to Table III-30, Definition of Significant Impact at Intersection, below.

Table III-30
Definition of Significant Impact at Intersection

Level of Service	Volume-to-Capacity (V/C)	Project-related Increase in Volume-to-Capacity (V/C) Ratio
C	0.701–0.800	Equal to or greater than 0.04
D	0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

Study Intersections

The Traffic Study provides a detailed analysis of existing (2017) and future (2021) traffic conditions during the weekday AM and PM peak hours at the following 10 study intersections (the "Project study area"), which are also depicted in Figure III-2, Project Site Vicinity and Study Intersection Location Map:

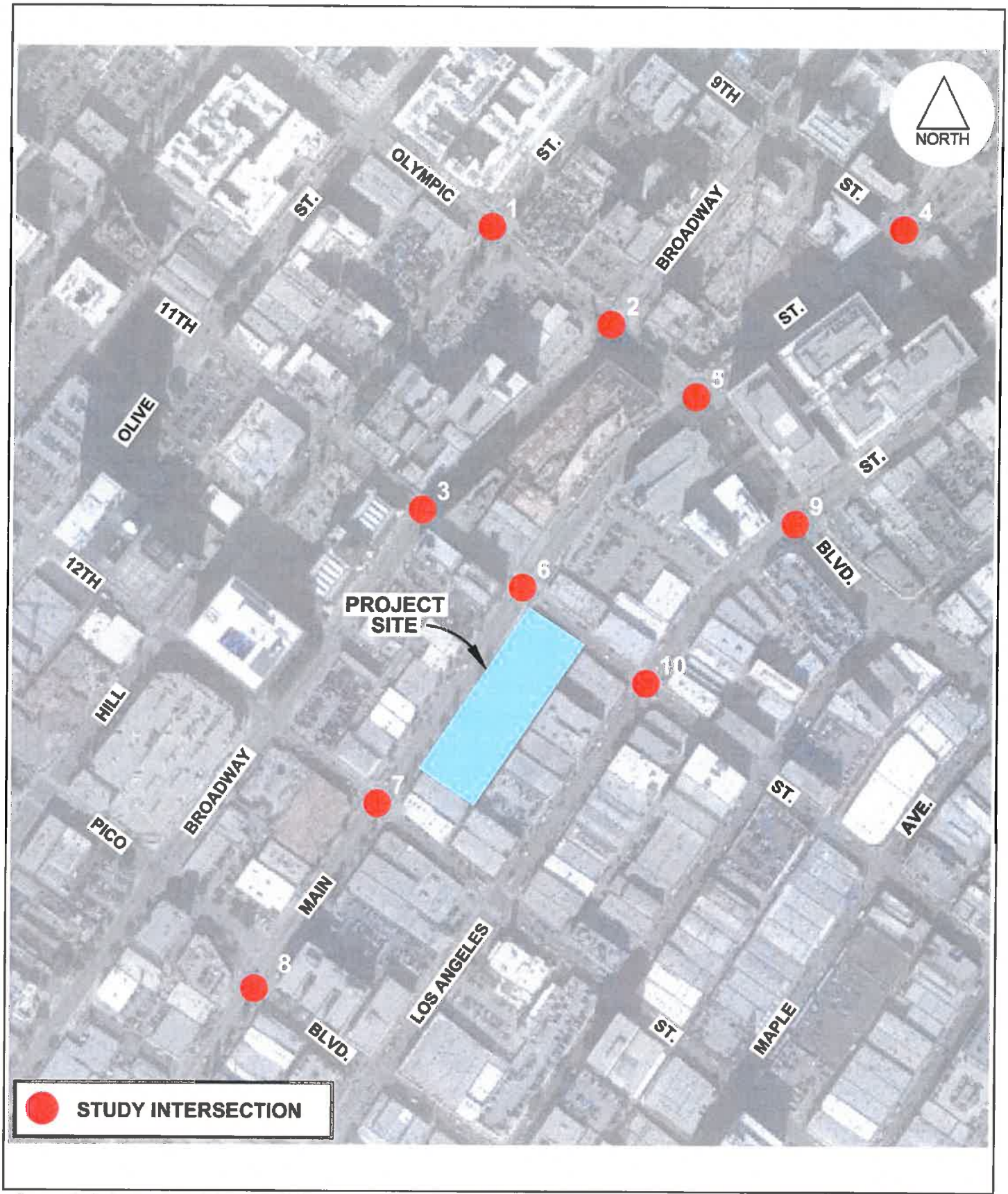
1. Hill Street & Olympic Boulevard
2. Broadway & Olympic Boulevard
3. Broadway & 11th Street
4. Main Street & 9th Street
5. Main Street & Olympic Boulevard
6. Main Street & 11th Street
7. Main Street & 12th Street
8. Main Street & Pico Boulevard
9. Los Angeles Street & Olympic Boulevard
10. Los Angeles Street & 11th Street

The 10 study intersections listed above are signalized. They were selected in consultation and approval with the LADOT for the analysis of potential Project traffic impacts. Per current LADOT policy, when determining which intersections should be included in the impact analysis for development projects, only signalized locations should be included. Unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control devices, but will not be included in the impact analysis. The existing peak-hour traffic volumes for these intersections, along with information pertaining to intersection geometrics, traffic signal operations, and on-street parking restrictions were analyzed using established traffic-engineering techniques.

Existing (2017) Intersection Conditions

Traffic volumes for existing conditions were obtained from manual traffic counts conducted between 2012 and 2016 at the study area intersections. Due to ongoing construction in the direct project vicinity (most notably on Main Street, between 9th Street and 12th Street, it was necessary to obtain traffic counts unaffected by ongoing construction in order to represent typical weekday conditions. Traffic counts unaffected by ongoing construction could not be obtained for the intersections of Main Street & 9th Street, Main Street & Olympic Boulevard, Main Street & 11th Street, Main Street & 12th Street, and Los Angeles Street & Olympic Boulevard.

Thus, traffic counts for these intersections were taken from previous project traffic impact studies prepared for LADOT. Although these traffic counts, in some cases, are more than two years old, they represent typical traffic conditions for their years of collection. For some intersections, multiple traffic counts were provided by LADOT. Average traffic volumes for these locations, using all provided traffic counts, were used in order to represent better typical traffic conditions. In accordance with the LADOT Transportation Impact Study Guidelines (December 2016), the intersection traffic counts for this study were completed on a typical weekday during the morning and afternoon peak commute periods, which range from 7:00 to 10:00 AM and 3:00 to 6:00 PM, respectively. Due to the fact that these counts were all conducted before December 2016, they do not include the enhanced bicycle and pedestrian count summary sheets required in the new guidelines.



Source: Crain & Associates, February 9, 2017

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Figure III-2
Project Site Vicinity and Study Intersection Location Map

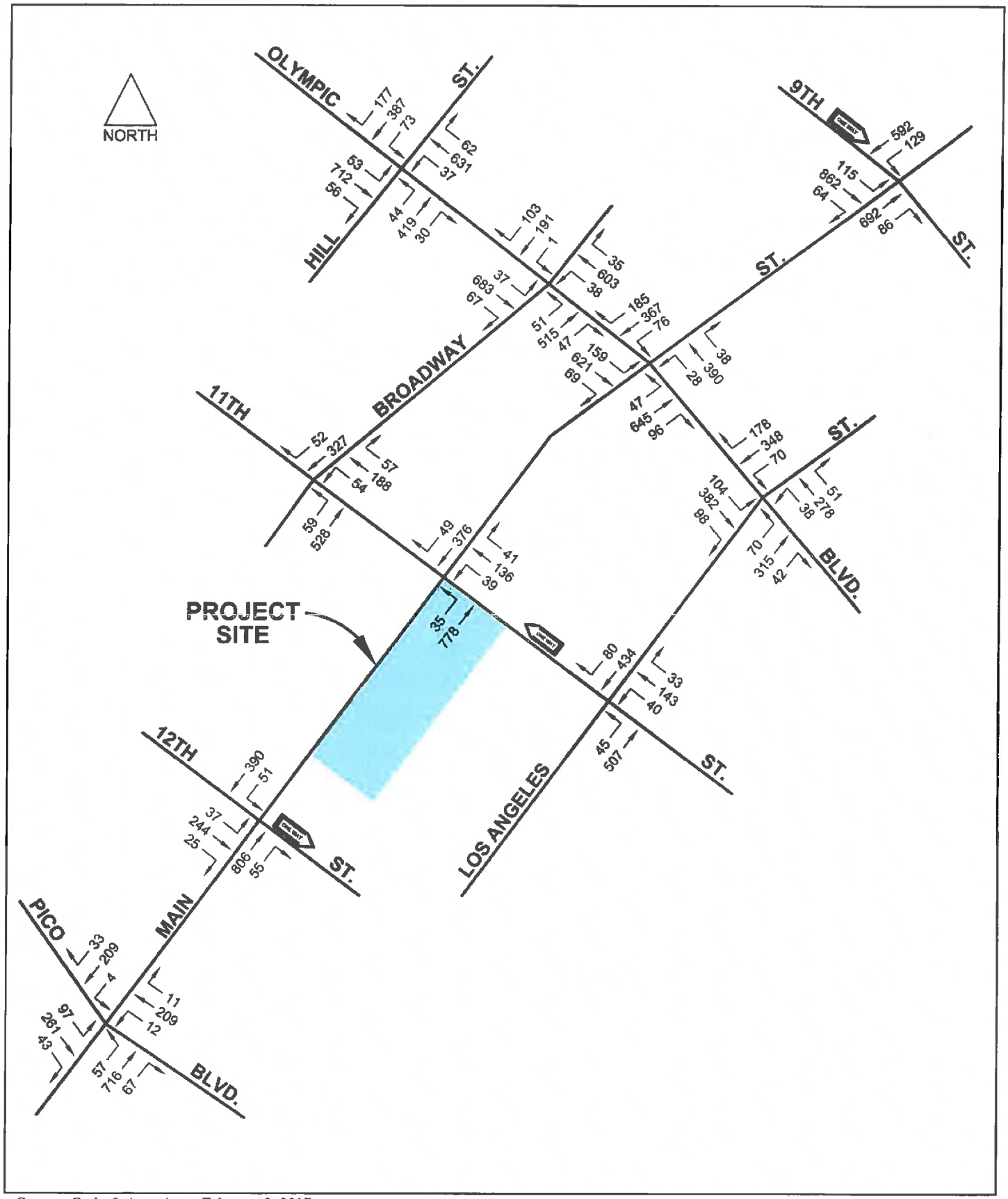
Peak-hour volumes were determined individually for each intersection based on the highest-volume four consecutive 15-minute periods for all vehicular movements. In order to account for potential increases in traffic volumes between the count date in 2012-2016 and the existing analysis year of 2017, the historical traffic counts were factored upward by 0.2 percent compounded annually in order to develop 2017 traffic volumes. This 0.2 percent growth rate, based on a conservative calculation of the ambient growth factor per the Los Angeles County 2010 CMP[55], has been determined by LADOT to be appropriate for recent traffic growth in Downtown Los Angeles. The analyses of Existing (2017) AM and PM peak-hour conditions at the study intersections are summarized in Table III-31. The Existing (2017) AM and PM peak-hour volumes at the study intersections are illustrated in Figures III-3 and Figure III-4 for the AM and PM peak hour, respectively.

Table III-31
Existing Condition – Intersection Level of Service

No.	Intersection	Peak Hour	V/C Ratio	LOS
1.	Hill Street & Olympic Boulevard	AM	0.414	A
		PM	0.534	A
2.	Broadway & Olympic Boulevard	AM	0.365	A
		PM	0.565	A
3.	Broadway & 11th Street	AM	0.273	A
		PM	0.649	B
4.	Main Street & 9th Street	AM	0.481	A
		PM	0.556	A
5.	Main Street & Olympic Boulevard	AM	0.452	A
		PM	0.699	B
6.	Main Street & 11th Street	AM	0.263	A
		PM	0.553	A
7.	Main Street & 12th Street	AM	0.323	A
		PM	0.551	A
8.	Main Street & Pico Boulevard	AM	0.391	A
		PM	0.640	B
9.	Los Angeles Street & Olympic Boulevard	AM	0.337	A
		PM	0.474	A
10.	Los Angeles Street & 11th Street	AM	0.193	A
		PM	0.558	A

Source: Crain & Associates, February 9, 2017.

[55] *Based on general traffic volume growth factors for Regional Statistical Area 23 (Downtown L.A.), over the 10□ year period between 2010 and 2020, provided in Appendix D of the 2010 Congestion Management Program for Los Angeles County (Los Angeles County Metropolitan Transportation Authority).*



Source: Crain & Associates, February 9, 2017

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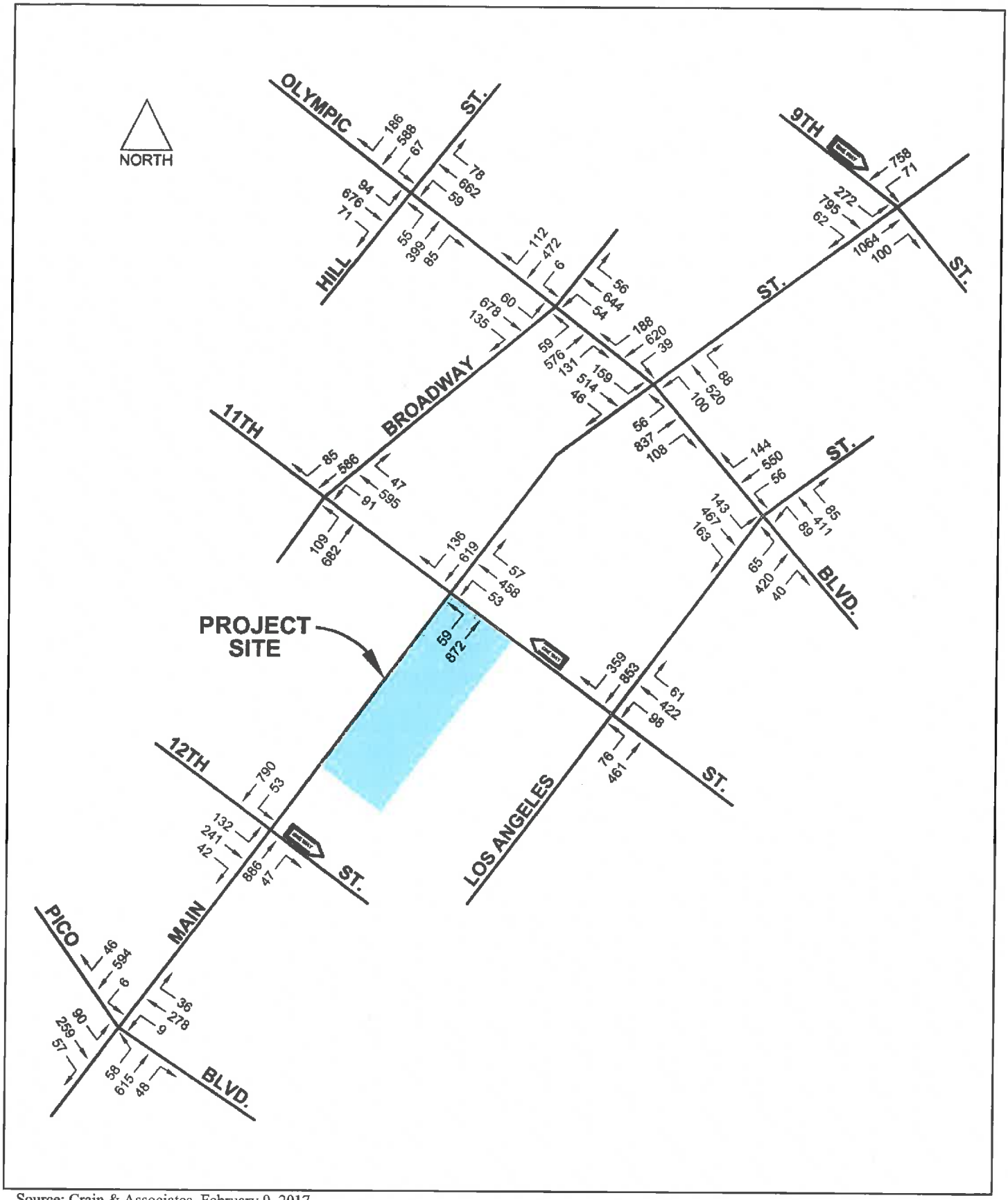
Figure III-3
Existing Traffic Volumes - AM Peak Hour



Source: Crain & Associates, February 9, 2017

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Figure III-4
Existing Traffic Volumes - PM Peak Hour

Existing Transit Service

The Project Site is located in downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. 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 and Commuter Express, Santa Monica Big Blue Bus ("BBB"), and the City of Gardena ("GTrans"). The Project Site's proximity to the Pico Rail Station, approximately one-half mile west, and the 7th Street / Metro Center Station, approximately three-quarters mile north, provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project are shown in Figure 4 and described further in the Traffic Study.

Future Conditions

Traffic Forecasts

There are a number of other projects either under construction or planned for development in the surrounding area that may contribute future traffic to the study locations. For this reason, the analysis of future traffic conditions was expanded to include potential traffic volume increases expected to be generated by those other projects. In order to evaluate future traffic conditions in the project area, an analysis of Existing (2017) traffic volumes was first conducted, as described previously. For the analysis of future conditions, an ambient traffic growth factor of 1.0 percent per year, compounded annually, was applied to these existing volumes at the 10 study intersections to develop future year (2021) baseline traffic volumes. Given that the Project is currently estimated to be completed in 2021, that year was selected as the future study year.

The inclusion of the annual growth factor generally accounts for area-wide traffic increases. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by "related projects" in the study area was also added to the future baseline traffic volumes. The total future volumes, including those due to related projects, formed the basis for the Future (2021) Without Project condition. Finally, the traffic expected to be generated by the Proposed Project was analyzed as an incremental addition to the Future (2021) Without Project condition, resulting in the Future (2021) With Project condition.

Ambient Traffic Growth

Based on an analysis of traffic growth projections for the Central City Community Plan area, the LADOT recommended the application of an ambient traffic growth factor of 1.0 percent per year for future traffic growth. This growth factor was used to account for increases in traffic due to potential development projects not yet proposed or outside the study area. Compounded annually, the ambient traffic growth factor was applied to the existing (2017) traffic volumes to develop the estimated baseline volumes for the future study year (2021).

Related Projects

In addition to the use of the ambient growth rate, listings of potential projects located in the surrounding area ("related projects") that might be developed or under construction within the study time frame were obtained from the LADOT and City of Los Angeles Planning Department in January 2017.

Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate 1.5-mile radius of the Project Site were included. Refinement of the information resulted in a total of 108 related projects in the surrounding area that could add traffic to the study intersections.

The locations of the related projects are shown in II-20, related Project Location Map. The related project locations, descriptions, and trip generation estimates are listed in II-6, Related Project List. The number of trips expected to be generated by the related projects was obtained from information provided by public agencies, traffic studies, and environmental reports, to the extent available. For related projects with incomplete trip generation and/or peak-hour directional (inbound/outbound) distribution information, estimates were determined by applying the appropriate rates and/or directional splits from the ITE Trip Generation Manual (9th Edition, 2012).

Highway System Improvements

In order to better analyze future traffic conditions in the project area, an investigation regarding relevant future transportation improvements to the roadway system infrastructure in the study area was conducted. A few traffic improvements were identified as scheduled for implementation that would affect use of the existing street system.

As described in the Traffic Study, all of the study intersections are scheduled to be upgraded to the City's combined ATSAC/ATCS system by summer 2017. The combined ATSAC/ATCS signal enhancements have been recognized to increase intersection capacities by approximately 10 percent at locations where they have been installed. Given that these improvements are scheduled to occur before the buildout year of the Project, the combined ATSAC/ATCS improvements have been incorporated into the analysis of future (2021) traffic conditions.

In addition to these traffic signal enhancements, the goals and policies of the City's 2010 Bicycle Plan (City of Los Angeles Department of Planning, adopted March 1, 2011) have been folded into the Mobility Plan 2035. It is a Mobility Plan objective to complete the proposed paths, protected cycle tracks, bicycle lanes, routes, and priority Neighborhood Enhanced Network roadway segments by 2035. While some of these improvements have already been realized, the following improvements remain to be implemented within the Project study area:

- 11th Street will become a Bicycle Friendly Street (BFS) from Broadway to past the western extent of the Project study area. BFSs use a holistic engineering approach to render streets extremely inviting to bicycles by introducing signage, pavement markings, bulb-outs, and other traffic calming techniques. While BFS improvements make streets more inviting to cyclists, it is not

anticipated that any passenger vehicle lane or phasing configurations will be changed as a result of the transition of this segment;

- Pico Boulevard will be designated as a Class III bicycle route throughout the Project study area. As a bicycle route, the segment of Pico Boulevard near the Project site will likely install posted signage and shared arrow (sharrow) pavement markings. However, it is not anticipated that any passenger vehicle lane or phasing configurations will be changed as a result of this route designation; and
- Hill Street will add a Class I bicycle lane throughout the Project study area. Vehicular lanes will likely be reconfigured to accommodate this bicycle lane.

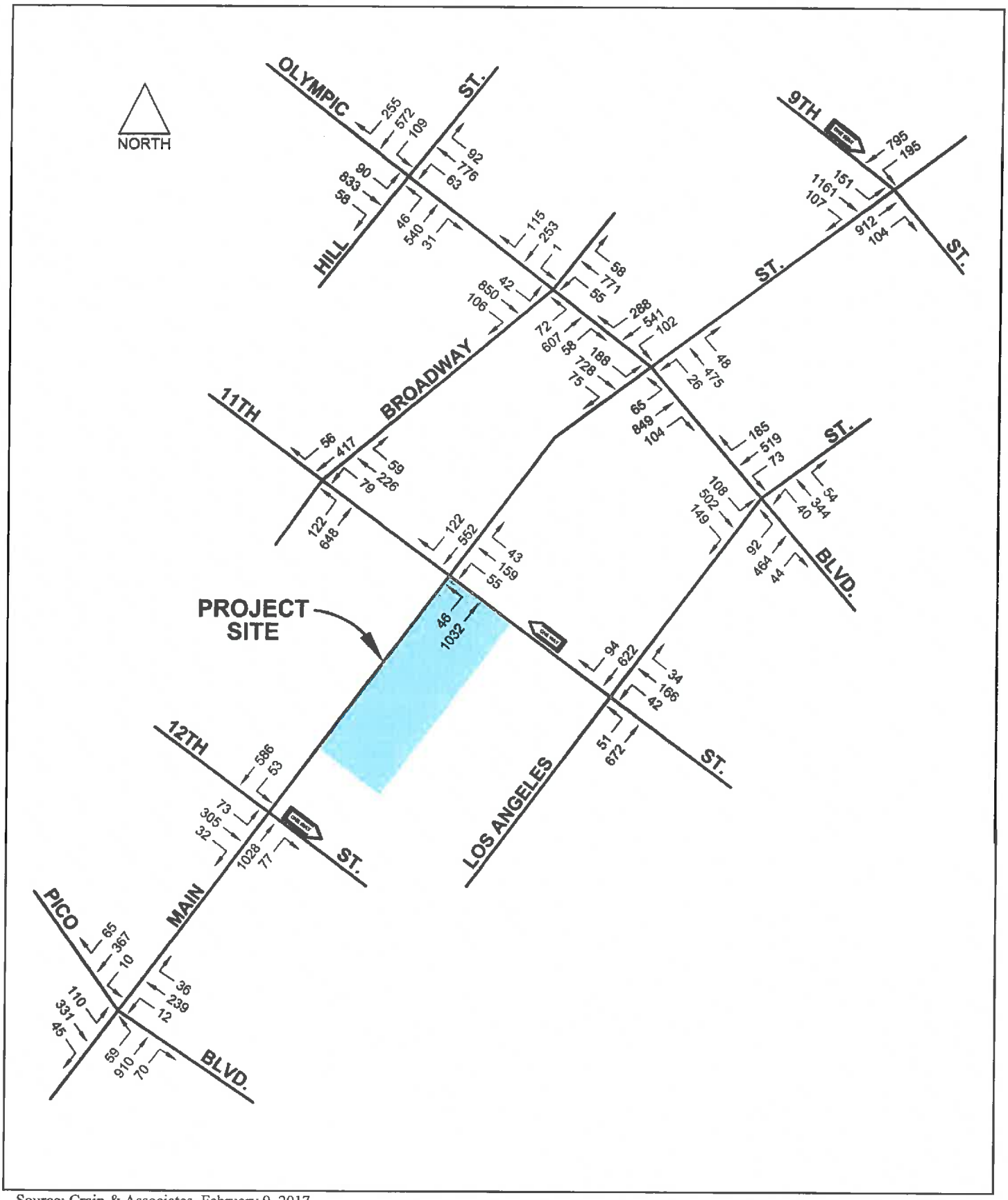
Per information provided by LADOT staff, design and construction of the Hill Street Class I bicycle lane is not expected between now and the Project buildout year of 2021. As such, no changes to the study intersections geometrics and/or traffic control conditions due to bicycle facility improvements has been assumed under future (2021) traffic conditions in this traffic impact analysis.

A review of the LADOT Transportation Capital Improvement Projects and Bureau of Engineering Street Improvement Master Schedule revealed one improvement project (the Los Angeles Streetcar Project) that could affect operations at the study intersection locations:

- The Los Angeles Streetcar project would construct a streetcar route along an approximate four-mile loop around Downtown Los Angeles. While the construction and operation of this streetcar would likely affect the lane or phasing configurations along Broadway within the Project study area, plans have not been finalized and there is no set route. The Final Environmental Impact Report was issued on October 24, 2016, but there is currently no finalized timeline for completion. Therefore, roadway changes associated with the Los Angeles Streetcar Project have not been assumed under future (2021) traffic conditions in this traffic impact analysis.

Future Traffic Forecasts for 2021 Without Project Condition

Future (2021) baseline traffic volumes for the Without Project condition were determined by superimposing area-wide ambient traffic growth and the total related projects traffic volumes onto the existing (2017) traffic volumes. The Future (2021) Without Project traffic volumes are depicted in Figures III-5 and II-6 for the AM and PM peak hours, respectively, and summarized below in Table III-32. Under Future (2021) Without Project conditions, traffic operations are expected to degrade when compared with existing conditions due to the ambient and related project traffic volume growth. Under Future (2021) Without Project conditions, seven study intersections would operate at LOS C or better during both peak hours, two would operate at LOS D or better during both peak hours, and one intersection would operate at LOS F during one peak hour (Main Street & Olympic Boulevard, PM peak hour).



Source: Crain & Associates, February 9, 2017

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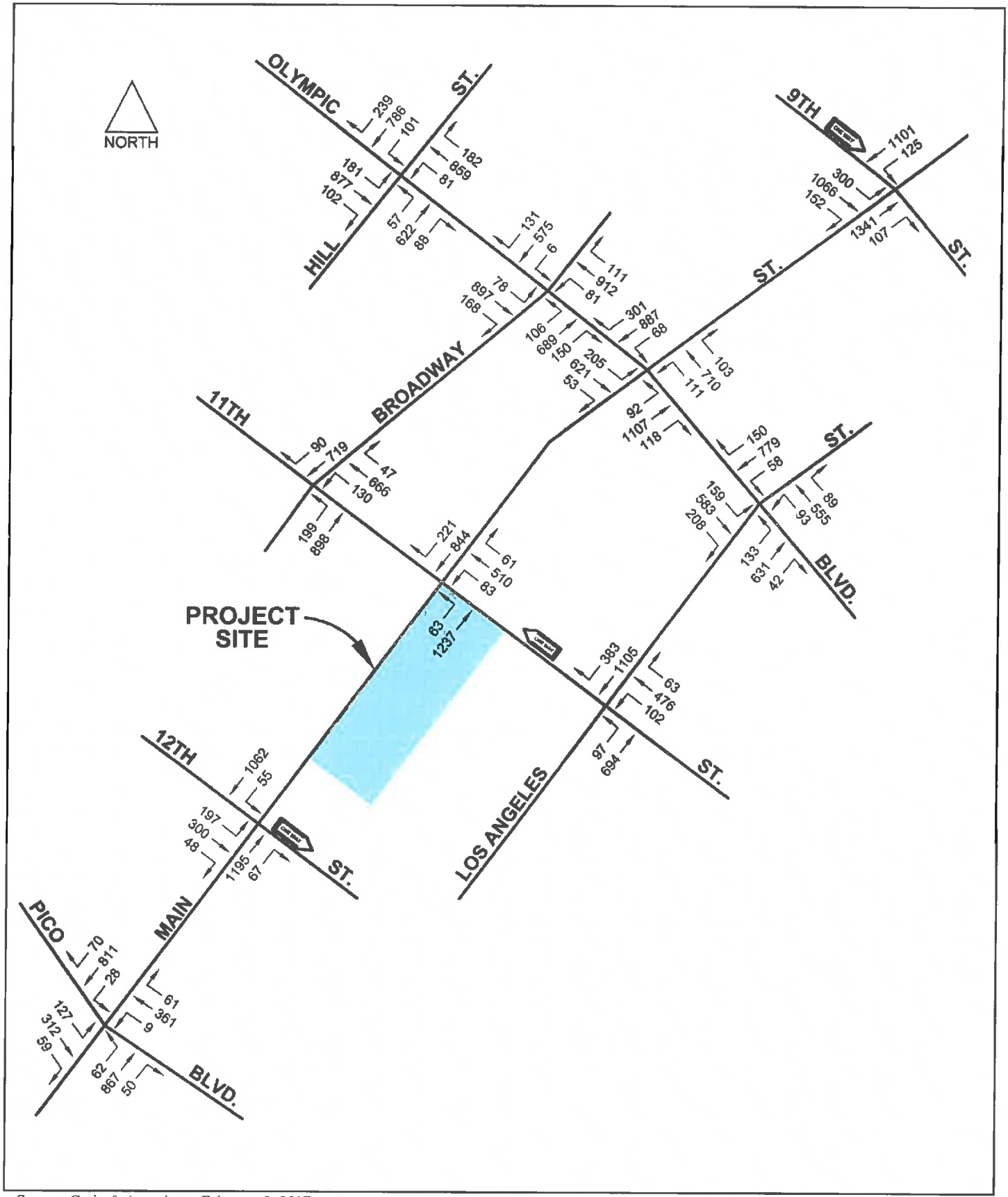
Figure III-5
Future Without Project Traffic Volumes - AM Peak Hour



Source: Crain & Associates, February 9, 2017

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Figure III-6
Future Without Project Traffic Volumes - PM Peak Hour

Table III-32
Future (2021) Conditions With Out Project – Intersection Level of Service

No.	Intersection	Peak Hour	V/C Ratio	LOS
1.	Hill Street & Olympic Boulevard	AM	0.556	A
		PM	0.748	C
2.	Broadway & Olympic Boulevard	AM	0.507	A
		PM	0.767	C
3.	Broadway & 11th Street	AM	0.399	A
		PM	0.837	D
4.	Main Street & 9th Street	AM	0.651	B
		PM	0.737	C
5.	Main Street & Olympic Boulevard	AM	0.641	B
		PM	1.016	F
6.	Main Street & 11th Street	AM	0.370	A
		PM	0.703	C
7.	Main Street & 12th Street	AM	0.403	A
		PM	0.739	C
8.	Main Street & Pico Boulevard	AM	0.475	A
		PM	0.854	D
9.	Los Angeles Street & Olympic Boulevard	AM	0.440	A
		PM	0.625	B
10.	Los Angeles Street & 11th Street	AM	0.261	A
		PM	0.653	B

Source: Crain & Associates, February 9, 2017.

Project Impacts

The Proposed Project's uses are divisible into two primary categories: residential and commercial retail. The residential component of the Proposed Project would consist of 379 apartment dwelling units, 42 of which would be affordable housing units. The commercial component of the Proposed Project would consist of approximately 25,810 square feet of ground-floor commercial retail space. The Project Site is presently occupied by approximately 58,220 square feet of active specialty retail space. This existing retail space would be removed in conjunction with development of the Proposed Project.

Estimated Trip Generation

The latest version of the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) was used to develop the traffic characteristics of the Proposed Project. The trip generation equations and rates in the ITE manual are nationally recognized and are used as the basis for most traffic impact studies conducted in the City of Los Angeles and surrounding region. Information was obtained from the Trip Generation Manual for ITE Land Use Code (LUC) 220 – Apartment, LUC 820 – Shopping Center, and LUC 826 – Specialty Retail Center. In addition to these ITE LUCs, trip generation rates for affordable housing (family) were provided by LADOT, based on empirical surveys of more than 35 sites

performed throughout the City of Los Angeles in early 2016. Table III-33 presents the trip generation rates and equations used to generate the daily and peak-hour traffic volumes for the Project.

Table III-33
Project Trip Generation Rates

Land Use	ITE Code	Intensity	Average Weekday	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Apartment	220	1 du	6.65	20%	80%	0.51	65%	35%	0.62
Affordable Housing – Family[1]	--	1 du	4.08	40%	60%	0.50	55%	45%	0.34
Shopping Center	820	1 ksf	42.70	62%	38%	0.96	48%	52%	3.71
Specialty Retail Center	826	1 ksf	44.32	60%	40%	1.20	44%	56%	2.71

Notes:
du = dwelling unit; ksf = thousands of square feet of gross floor area
[1] Affordable housing (family) trip rates provided by LADOT, based on empirical surveys of 35+ sites performed throughout the City in early 2016.
Source: Crain & Associates, February 9, 2017.

By applying the trip rates provided in Table III-33, baseline daily, AM peak-hour and PM peak-hour trips were calculated for the Proposed Project uses. As these rates do not account for such trip-reducing factors as internally captured trips, significant transit usage and/or walk trip potential, or pass-by trips, the baseline trips reflect a conservative condition. These trip-reducing factors are important considerations in determining the actual traffic-generating characteristics of a project and, therefore, adjustments were made to the Proposed Project's baseline trip generation estimates. Given the mix of proposed uses on the Project Site, the existing and proposed mix of nearby land uses within the Central City Community Plan area, and the Proposed Project's location to public transportation options, adjustments to account for internal trips, use of public transportation, walk-in trips to and from the Project Site and pass-by trips, were approved by LADOT staff in a MOU dated December 27, 2016.

Based on the trip generation rates and aforementioned trip reduction factors, projections of the amount of traffic to be generated for the Proposed Project were derived. III-33 summarizes the trip generation for the Project. As shown in Table III-34, once completed and occupied, the Proposed Project is anticipated to generate a total of 385 net trips per day, with 112 net trips during the AM peak hour and 92 net trips during the PM peak hour. These peak-hour trips were distributed to analyze Project impacts at the 10 study intersections.

Per LADOT policy and as a conservative procedure, trip reductions for commercial retail use pass-by activity were not be applied to the Proposed Project's driveways and appropriate site adjacent intersections, since pass-by trips, while not new to the area roadways, would be included in the number of vehicles that enter and exit the site's driveways and appropriate site-adjacent intersection turning movements required for project access. The total project traffic volumes at the project driveways and appropriate site-adjacent intersections were also calculated. These calculations indicate that

approximately 577 net trips per day, with 115 net trips during the AM peak hour and 113 trips during the PM peak hour, would access the project driveways.

Table III-34
Project Trip Generation Summary

Description	Size	Average Weekday	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Uses								
Residential								
Apartment	337 du	2,241	34	138	172	136	73	209
10% Internal Capture Adjustment		(102)	(1)	(2)	(3)	(5)	(5)	(10)
15% Transit Adjustment		(321)	(5)	(20)	(25)	(20)	(10)	(30)
5% Walk Adjustment		(91)	(1)	(6)	(7)	(6)	(3)	(9)
Apartment Total		**1,727**	**27**	**110**	**137**	**105**	**55**	**160**
Affordable Housing	42 du	171	8	13	21	8	6	14
10% Internal Capture Adjustment		(8)	0	0	0	0	0	0
15% Transit Adjustment		(24)	(1)	(2)	(3)	(1)	(1)	(2)
5% Walk Adjustment		(7)	0	(1)	(1)	(1)	0	(1)
Affordable Housing Total		**132**	**7**	**10**	**17**	**6**	**5**	**11**
Residential Total		**1,859**	**34**	**120**	**154**	**111**	**60**	**171**
Commercial								
Shopping Center	25.810 ksf	1,102	16	9	25	46	50	96
10% Internal Capture Adjustment		(110)	(2)	(1)	(3)	(5)	(5)	(10)
15% Transit Adjustment		(149)	(2)	(1)	(3)	(6)	(7)	(13)
5% Walk Adjustment		(42)	(1)	0	(1)	(2)	(2)	(4)
50% Pass-By Adjustment		(400)	(6)	(3)	(9)	(16)	(18)	(34)
Commercial Total		**401**	**5**	**4**	**9**	**17**	**18**	**35**
Proposed Project Driveway Trips (Including Pass-By Trips)		2,660	45	127	172	144	96	240
Proposed Project Trips		**2,260**	**39**	**124**	**163**	**128**	**78**	**206**
Existing Uses								
Commercial								
Specialty Retail	58.220 ksf	2,508	42	28	70	70	88	158
15% Transit Adjustment		(387)	(6)	(4)	(10)	(11)	(13)	(24)
5% Walk Adjustment		(110)	(2)	(1)	(3)	(3)	(4)	(7)
10% Pass-By Adjustment		(208)	(4)	(2)	(6)	(6)	(7)	(13)
Commercial Total		**1,875**	**30**	**21**	**51**	**50**	**64**	**114**
Existing Project Driveway Trips (Including Pass-By Trips)		2,083	34	23	57	56	71	127
Existing Project Trips		1,875	30	21	51	50	64	114
Net Project Driveway Trips (Including Pass-By Trips)		577	11	104	115	88	25	113
Net Project Trips		**385**	**9**	**103**	**112**	**78**	**14**	**92**

Notes:
Notes:
du = dwelling unit; ksf = thousands of square feet of gross floor area
Source: Crain & Associates, February 9, 2017

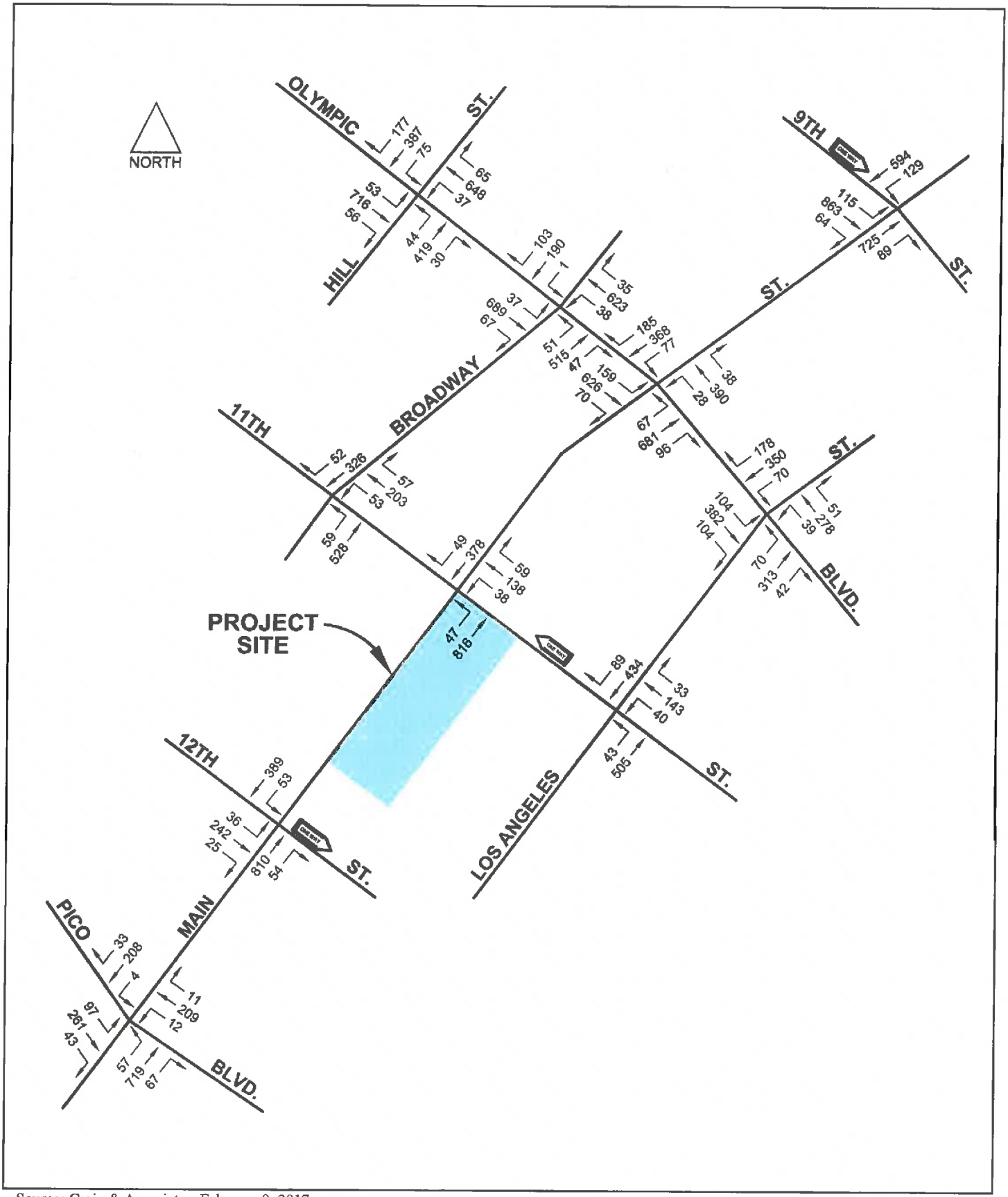
Existing With Project Intersection Level of Service

The Existing (2017) Plus Project traffic volumes were determined by superimposing the Project-only traffic volumes onto the Existing (2017) traffic volumes. The Existing (2017) Plus Project traffic volumes at the study intersections are shown in Figure III-7 and III-8 for the AM and PM peak hours, respectively. The results of the analysis of Existing (2017) Plus Project traffic conditions at the study intersections are summarized in Table III-35. Under Existing (2017) Conditions with Project all 10 study intersections would operate at LOS C or better during both peak hours. Only one intersection would exhibit deterioration in LOS during either peak hour (Main Street & Olympic Boulevard, from LOS B to LOS C during the PM peak hour).

Table III-35
Existing Conditions With Project– Intersection Level of Service

No.	Intersection	Peak Hour	Existing		Plus Project		Impact	Significant Impact?
			V/C Ratio	LOS	V/C Ratio	LOS		
1.	Hill Street & Olympic Boulevard	AM	0.414	A	0.421	A	0.007	No
		PM	0.534	A	0.537	A	0.003	No
2.	Broadway & Olympic Boulevard	AM	0.365	A	0.367	A	0.002	No
		PM	0.565	A	0.574	A	0.009	No
3.	Broadway & 11th Street	AM	0.273	A	0.277	A	0.004	No
		PM	0.649	B	0.646	B	-0.003	No
4.	Main Street & 9th Street	AM	0.481	A	0.493	A	0.012	No
		PM	0.556	A	0.561	A	0.005	No
5.	Main Street & Olympic Boulevard	AM	0.452	A	0.469	A	0.017	No
		PM	0.699	B	0.708	C	0.009	No
6.	Main Street & 11th Street	AM	0.263	A	0.272	A	0.009	No
		PM	0.553	A	0.557	A	0.004	No
7.	Main Street & 12th Street	AM	0.323	A	0.325	A	0.002	No
		PM	0.551	A	0.549	A	-0.002	No
8.	Main Street & Pico Boulevard	AM	0.391	A	0.392	A	0.001	No
		PM	0.640	B	0.640	B	0.000	No
9.	Los Angeles Street & Olympic Boulevard	AM	0.337	A	0.341	A	0.004	No
		PM	0.474	A	0.493	A	0.019	No
10.	Los Angeles Street & 11th Street	AM	0.193	A	0.195	A	0.002	No
		PM	0.558	A	0.573	A	0.015	No

Source: Crain & Associates February 9,, 2017.



Source: Crain & Associates, February 9, 2017

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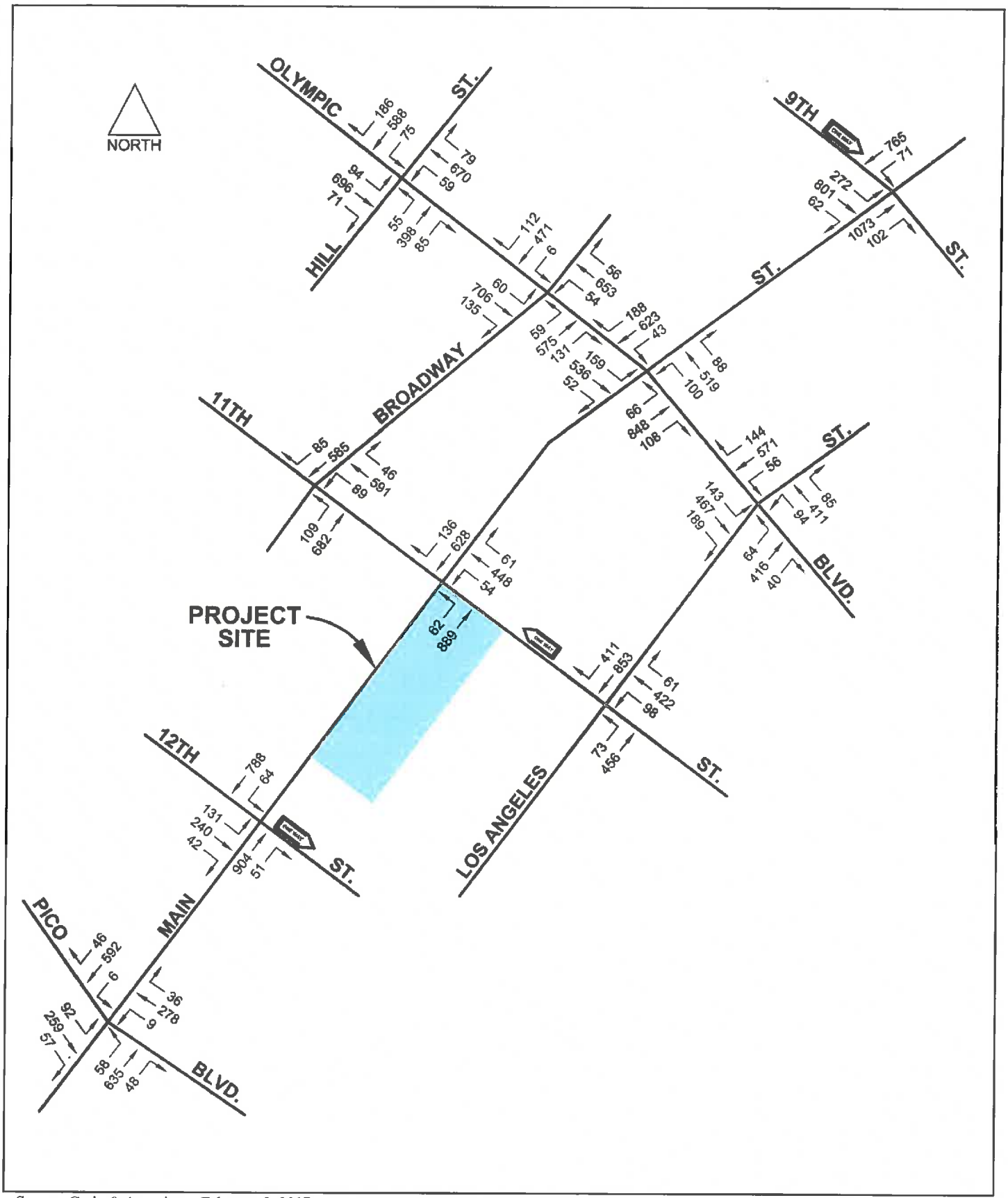
Figure III-7
Existing With Project Traffic Volumes - AM Peak Hour



Source: Crain & Associates, February 9, 2017

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Figure III-8
Existing With Project Traffic Volumes - PM Peak Hour

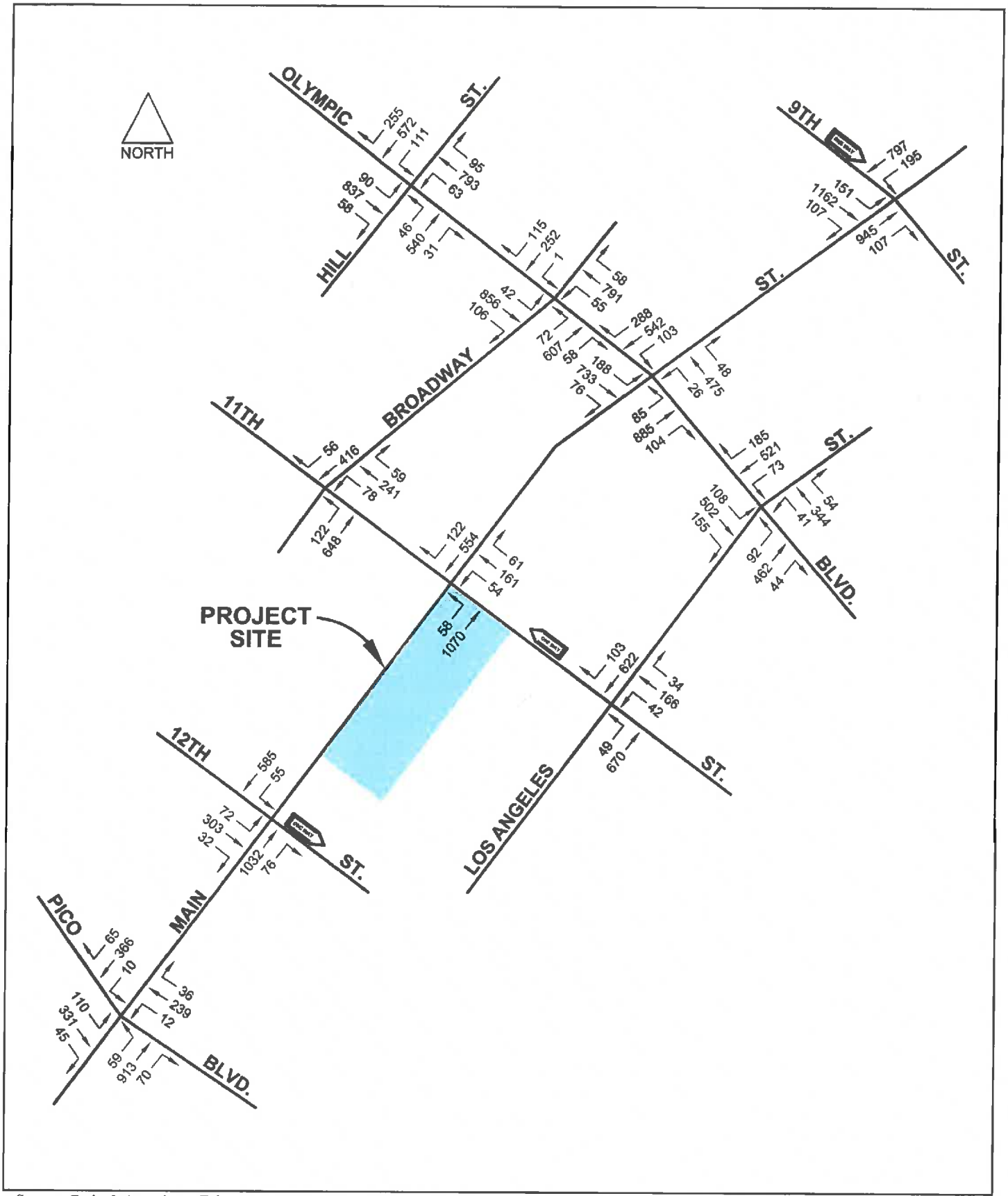
Future (2021) with Project Intersection Level of Service

Project volumes were added to the Future (2021) Without Project traffic volumes to develop the Future (2021) With Project volumes. The Future (2021) With Project volumes were then used to determine traffic impacts directly attributable to the Proposed Project. The Future (2021) With Project AM and PM peak-hour traffic volumes are shown in Figures III-9 and III-10, respectively and summarized below in Table III-36. Under Future (2021) With Project conditions, the addition of Project-related traffic would not deteriorate the LOS at any study intersection during either peak hour. Under Future (2021) With Project conditions, seven study intersections would continue to operate at LOS C or better during both peak hours, two study intersections would continue to operate at LOS D or better during both peak hours, and one study intersection would continue to operate at LOS F during both one peak hour (Main Street & Olympic Boulevard, PM peak hour).

Table III-36
Future (2021) Conditions With Project – Intersection Level of Service

No.	Intersection	Peak Hour	Without Project		With Project		Impact	Significant Impact?
			V/C Ratio	LOS	V/C Ratio	LOS		
1.	Hill Street & Olympic Boulevard	AM	0.556	A	0.563	A	0.007	No
		PM	0.748	C	0.751	C	0.003	No
2.	Broadway & Olympic Boulevard	AM	0.507	A	0.509	A	0.002	No
		PM	0.767	C	0.776	C	0.009	No
3.	Broadway & 11th Street	AM	0.399	A	0.403	A	0.004	No
		PM	0.837	D	0.835	D	-0.002	No
4.	Main Street & 9th Street	AM	0.651	B	0.663	B	0.012	No
		PM	0.737	C	0.742	C	0.005	No
5.	Main Street & Olympic Boulevard	AM	0.641	B	0.656	B	0.015	No
		PM	1.016	F	1.025	F	0.009	No
6.	Main Street & 11th Street	AM	0.370	A	0.380	A	0.010	No
		PM	0.703	C	0.707	C	0.004	No
7.	Main Street & 12th Street	AM	0.403	A	0.402	A	-0.001	No
		PM	0.739	C	0.737	C	-0.002	No
8.	Main Street & Pico Boulevard	AM	0.475	A	0.476	A	0.001	No
		PM	0.854	D	0.854	D	0.000	No
9.	Los Angeles Street & Olympic Boulevard	AM	0.440	A	0.443	A	0.003	No
		PM	0.625	B	0.643	B	0.018	No
10.	Los Angeles Street & 11th Street	AM	0.261	A	0.258	A	-0.003	No
		PM	0.653	B	0.669	B	0.016	No

Source: Crain & Associates, February 9, 2017.



Source: Crain & Associates, February 9, 2017

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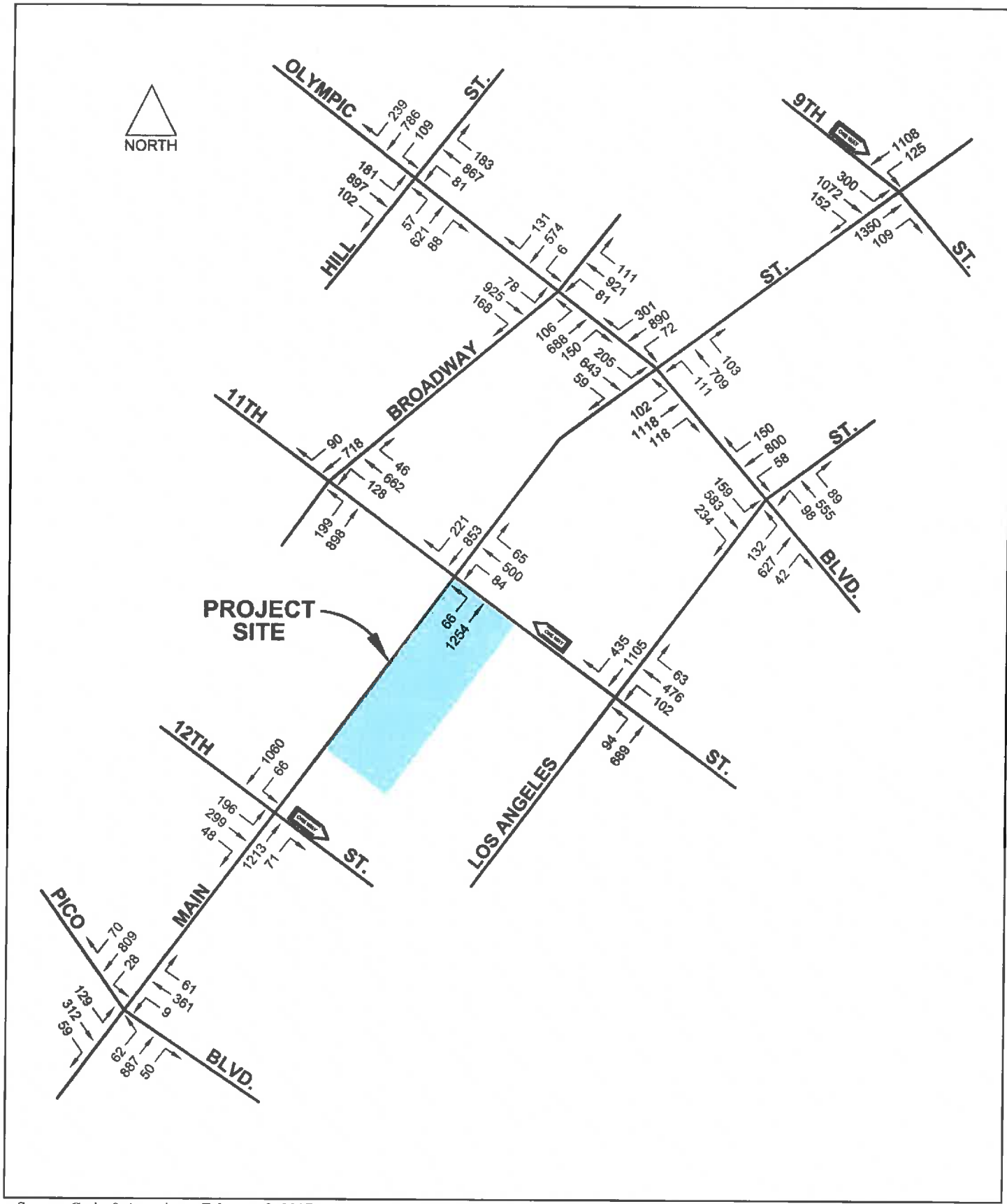
Figure III-9
Future With Project Traffic Volumes - AM Peak Hour



Source: Crain & Associates, February 9, 2017

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Figure III-10
Future With Project Traffic Volumes - PM Peak Hour

Construction Traffic

The Applicant will attempt to park and stage for construction on-site as much as possible. During periods of time where off-site street surfaces are needed, such as during garage excavation, the Applicant will submit for review and approval a construction traffic control plan detailing days, time of day, and safety features Any off-site construction needs will be minimized and conducted outside of peak traffic times. Deliveries of construction material will be coordinated to non-peak travel periods, to the extent possible. Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and encouraged to use public transit services and/or shuttle service to the site, if needed. The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety

Additionally, the Proposed Project would require the use of haul trucks during site clearing and excavation, and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The Proposed Project would require approximately 115,000 cubic yards of soil of excavated soil to be exported off site. The local haul route exiting the Project Site would utilize Main Street, which is designated as a Modified Avenue I in the City's Mobility Plan, to travel southbound to the I-10 Freeway, utilizing 17th Street westbound to the Grand Ave./Hope Street freeway onramp. The local haul route entering the Project Site would utilize the Los Angeles Street exit from the I-10 Freeway, then travel northbound on Main Street. The haul route specified above may be modified in compliance with applicable City policies, provided DOT and/or Street Services approves any such modification.

The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Department of Building and Safety. The addition of these vehicles onto the street system would contribute to increased traffic in the Project vicinity. However, the Proposed Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersections. Therefore, it is not anticipated that this would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. Furthermore, implementation measure(s) detailed in LADOT's communication to the Planning Department shall be complied with. Such report and mitigation measure(s) are incorporated herein by reference. Due to the temporary nature of the traffic, construction impacts would be less than significant with the incorporation of Mitigation Measures T-1 through T-2, below.

Mitigation Measures

Increase Vehicle Trips/Congestion

T-1 A Construction Traffic Control Plan shall be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours.

T-2 All construction delivery truck loading and unloading shall take place on site or within

the boundaries of an approved Construction Traffic Control Plan.

T-3 Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project conflicts 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.

The traffic impact guidelines of the current 2010 Congestion Management Plan ("CMP") for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

The nearest CMP arterial monitoring locations to the Project site are the intersection of Alameda Street and Washington Boulevard (approximately 1.7 miles southeast of the Project site) and the intersection of Alvarado Street and Wilshire Boulevard (approximately 1.7 miles northwest).

Based on a review of the Proposed Project's trip generation, as shown in Table III-30, and the Proposed Project's trip distribution patterns, the Proposed Project is expected to contribute minimal traffic volumes to these CMP monitoring intersections during the weekday AM and PM peak hours (fewer than five trips at each intersection, during each peak hour). Further, it is expected that Proposed Project's traffic volume contributions to more distant CMP arterial monitoring locations would be even lower, given that project traffic would disperse across an increasing number of roadways when further from the Project Site. With

project traffic contributions well below the 50-trip threshold, no significant project impacts to CMP arterial monitoring locations are forecast and no additional arterial intersection analysis is necessary.

In terms of CMP freeway monitoring segment analysis, a review of the Proposed Project's trip generation indicates that the Proposed Project would not generate more than 103 net directional (inbound or outbound) trips during either peak hour. Therefore, the Project would contribute well below the 150 directional-trip threshold to all CMP freeway monitoring segments, no significant Project impacts to CMP freeway monitoring locations are forecast, and no additional freeway analysis is necessary. The local CMP also requires that all projects consider potential transit impacts. As shown in III-33, the Project trip generation reflects a transit adjustment of 15 percent for all land uses, which amounts to 107 net new daily transit trips, with 21 AM peak-hour and 21 PM peak-hour transit trips. Per the 2010 CMP guidelines, person transit trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4. Therefore, the number of net project person transit trips would be approximately 150 daily person transit trips, with 29 AM peak-hour and 29 PM peak-hour person transit trips. Based on recent ridership information provided by Metro and the LADOT, many of the bus and lines operating in the Project study area experience ridership levels well below capacity during the AM and PM peak hours. With a combined four transit operators operating 33 different bus routes within a convenient walking distance of the Project Site, the local transit system offers substantial available ridership capacity. Therefore, it is expected that the incremental additions of project person transit trips would not have a significant impact on transit service in the study area. As such, the Proposed Project would not conflict with the adopted CMP and impacts would be less than significant.

c) Would the project 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?

No Impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. The Proposed Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in Los Angeles. Therefore, no impact would occur.

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

No Impact. A significant impact may occur if the Proposed Project includes 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. The Proposed Project would not include unusual or hazardous design features. Primary residential and commercial retail access/egress would be provided via the alley at the rear of the Project Site. From the alley, a full-access driveway would provide a connection to the subterranean garage for project residents and guests. Commercial retail parking would be provided at the ground level, off the alley, via a pair of one-way driveways (inbound and outbound only). A secondary, limited-access driveway (right turns in/out only) would intersect the east side of Main Street, north of 12th Street. The Proposed Project would not introduce new vehicular

access driveways that could potentially conflict with pedestrian circulation and traffic. Therefore, the Proposed Project would not substantially increase hazards due to design features or incompatible uses, and no impact would occur.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

As previously discussed in Section VIII(g), the Proposed Project is not located on or near an adopted emergency response or evacuation plan. Development of the Project Site may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, the impacts would be less than significant.

As described in Section XIV(a), the Proposed Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Mitigation Measures T-1, T-2 and T-3 would reduce impacts associated with vehicle and pedestrian circulation during construction to a less than significant level. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and impacts would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Per the 2010 CMP guidelines, person transit trips can be estimated by multiplying the transit vehicle trip reductions by a conversion factor of 1.4. Therefore, the number of net project person transit trips would be approximately 150 daily person transit trips, with 29 AM peak-hour and 29 PM peak-hour person transit trips. Based on recent ridership information provided by Metro and the LADOT, many of the bus and lines operating in the Project study area experience ridership levels well below capacity during the AM and PM peak hours. With a combined four transit operators operating 33 different bus routes within a convenient walking distance of the Project Site, the local transit system offers substantial available

ridership capacity. Therefore, it is expected that the incremental additions of project person transit trips would not have a significant impact on transit service in the study area.

The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. The Proposed Project would not interfere with any class I or class II bikeway systems. The Project Site is located in a highly urbanized area of Downtown Los Angeles within a Transit Priority Area (as defined by CEQA). The Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within a ½ mile of the Pico Rail Station and numerous bus routes with peak commute service intervals of 15 minutes or less. Additionally, the Proposed Project would provide 443 bicycle parking spaces on-site. The location of the Proposed Project encourages a variety of transportation options. Furthermore, Mitigation Measure T-1, T-2 and T-3 would reduce to impacts associated with vehicle and pedestrian circulation during construction to a less than significant level. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, or safety of such facilities, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 108 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City Community Plan Area. As noted in Table III-32, Future (2021) Conditions With Project – Intersection Level of Service, all increases in V/C ratios in the AM peak hour and PM peak hour would be less than the threshold for a significant impact to occur and the Proposed Project's contribution to cumulative impacts is less than significant for all of the study intersections analyzed. Therefore, the Proposed Project's cumulative impact is considered less than significant.

XVII. TRIBAL CULTURAL RESOURCES

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

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

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant

impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Less Than Significant Impact. As noted above, the Project would require excavations to a depth of approximately 33 to 40 feet below grade for the three level subterranean parking garage. As such, it is possible that unknown tribal cultural resources could be discovered on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. An informational letter was mailed to a total of ten Tribes known to have resources in this area, on November 21, 2016, describing the Project and requesting any information regarding resources that may exist on or near the Project site. On November 28, 2016, one tribal response was received from the Gabrieleno Band of Mission Indians – Kizh Nation who requested a certified Native American Monitor be on site during excavation for the project. A response letter was sent on January 20, 2017 and again on February 13, 2017 requesting the Tribe submit information supporting the need for an on-site monitor. Additionally, an SB 18 Sacred Lands File Search was also completed by the Native American Heritage Commission and the results were negative. As no additional information was received supporting the potential for discovery of Tribal resources, consultation was formally closed on April 28, 2017 and the Tribe was notified. As such, impacts will be less than significant.

XVIII. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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 Los Angeles RWQCB (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 Water Reclamation Plant (HWRP). The HWRP is a public facility and is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. Therefore, impacts associated with wastewater treatment requirements would be less than significant.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[56] The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

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[56] *Los Angeles Department of Water and Power, website: http://wsoweb.ladwp.com/Aqueduct/historyoflaa/waterquality.htm, accessed January 2017.*

As shown in Table III-37 below, the Proposed Project would generate a net increase in water demand of approximately 48,086 gallons per day (gpd) of water, significantly below available capacity. Because the Proposed Project is consistent with the zoning and General Plan land use designations, and the Project's population growth is within SCAG's forecast, the Project's increased water demand would not measurably reduce the LAAFP's treatment capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Based on communication from the LADWP, the Project Site is currently serviced by a 12" main in Main Street and an 8" main in 11th Street. The static water pressure in the main in 11th Street ranges from 52 psi to 63 psi. The static water pressure in the main in Main Street ranges from 74 psi to 97 psi. Based on these pressures, there are no know deficiencies in the project area. The LADWP should be able to provide domestic needs of the Proposed Project from the existing water system.[57] Although no system upgrades are anticipated at this time, the water system would be verified again at the time of construction. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Table III-37
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Existing Uses			
Commercial	58,220 sf	0.06 gpd/sf	3,493
Proposed Project			
Residential Units (379 total du)			
Studio	151 du	90 gpd/du	13,590
One Bedroom	155 du	132 gpd/du	20,460
Two-Bedroom	59 du	180 gpd/du	10,620
Three-Bedroom	14 du	228 gpd/du	3,192
Commercial			
Creative Office/Retail	25,810 sf	0.144 gpd/sf	3,717
		Total Project Water Demand:	**51,579**
		Less Existing Water Demand:	*-3,493*

[57] *City of Los Angeles, Los Angeles Department of Water and Power, written correspondence, dated December 26, 2016.*

NET Additional Water Demand:	**48,086**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, April 6, 2012, written correspondence provided by LADWP.*
Parker Environmental Consultants, 2017.

Wastewater Treatment Facilities and Existing Infrastructure

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[58] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table III-38, the Proposed Project would generate a net increase of approximately 40,071 gpd of wastewater, representing a fraction of one percent of the available capacity.

Table III-38
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Existing Uses			
Commercial	58,220 sf	0.05 gpd/sf	2,911
Proposed Project			
Residential Units (379 total du)			
Studio	151 du	75 gpd/du	11,325
One Bedroom	155 du	110 gpd/du	17,050
Two-Bedroom	59 du	150 gpd/du	8,850
Three-Bedroom	14 du	190 gpd/du	2,660
Commercial			

[58] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed January 2017.*

Creative Office/Retail	25,810 sf	0.12 gpd/sf	3,097
		Total Project Wastewater Generation:	**42,982**
		Less Existing Wastewater Generation:	*-2,911*
		NET TOTAL Wastewater Generation:	**40,071**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, written correspondence, dated November 2016.*
Parker Environmental Consultants, 2017.

Based on communication from the BOS, the Project Site is served by an existing 8-inch sewer pipe located on 11th Street and a 16-inch sewer line located on Main Street. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the BOS will verify the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Proposed Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Impacts to sewer capacity and infrastructure would be less than significant.[59] Therefore, impacts to sewer capacity and infrastructure would be less than significant.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described in Question IX(c) the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development Ordinance standards and retain or treat the first ¾-inch of rainfall in a 24-hour period. The Project Site is currently developed with seven commercial/retail buildings. The Project Site is completely covered with impervious surfaces. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in Section IX, the Project shall comply with the LID Plan and the Standard Urban Stormwater Mitigation Plan (SUSMP). The appropriate design and application of Best Management Practices (BMP) devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public

[59] *City of Los Angeles Bureau of Engineering, Frontier Project – Request for Wastewater Services Information, written correspondence, dated November 1, 2016.*

Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts would be considered less than significant.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table III-36, the Proposed Project's net increase in water demand would be 48,086 gallons per day. The Proposed Project would be consistent with the allowable land uses and density that are planned for the Project Site and is therefore within the growth projections of SCAG's RTP/SCS. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 180822, the 2014 Los Angeles Plumbing Code, the 2013 California Green Building Standards Code (CAL Green) and the 2014 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation

measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).[60]

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance.[61] Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2008 Regional Transportation Plan (RTP). As discussed previously in this section under the Population and Housing subheading, the Proposed Project's growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. The Proposed Project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the Project Site. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan.

Development of the Proposed Project in conjunction with the 108 related projects would further increase regional demands on LAAFP's capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the LAAFP's service to the City of Los Angeles. The Proposed Project and related projects cumulative water demand can be seen in Table III-34, below. As shown in Table III-39, the net water demand of the 108 related projects and the Proposed Project totals approximately 7,688,798 gpd or 7.7 mgd. Of the 50 to 150 mgd available water treatment capacity in LAAFP, the cumulative demand of 7.7 mgd would not significantly reduce capacity. As such, cumulative impacts with respect to water demand would be less than significant.

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[60] *City of Los Angeles, Los Angeles Department of Water and Power, written correspondence, dated December 26, 2016.*

[61] *Ibid.*

Table III-39
Estimated Cumulative Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Related Projects [b]			
Dwelling Units [c]	28,598 du	180 gpd/du	5,147,640
Banquet Room	63,157 sf	0.42 gpd/sf	26,526
Bar/Lounge	24,864 sf	0.864 gpd/sf	21,482
Coffee Shop	1,200 sf	0.864 gpd/sf	1,037
Fast-Food Restaurant (3,500 sf) [d]	156 seats	30 gpd/seat	4,680
Gymnasium	34,278 sf	0.24 gpd/sf	8,227
Hotel	4,637 rooms	144 gpd/room	667,728
Medical Office	71,385 sf	0.3 gpd/sf	21,416
Museum	17,600 sf	0.036 gpd/sf	634
Office	2,870,132 sf	0.144 gpd/sf	413,299
Rest Home/Assisted Living	160 bed	84 gpd/bed	13,440
Restaurant (509,022 sf) [d]	22,623 seat	36 gpd/seat	814,428
Retail	2,154,270 sf	0.03 gpd/sf	64,628
School: Day Care	71 children	10.8 gpd/child	767
School: College/University	21,300 students	19.2 gpd/student	408,960
School: Elementary	1,472 students	10.8 gpd/student	15,898
Theater	2,756 seat	3.6 gpd/seat	9,922
		Total Related Projects Water Demand:	**7,640,712**
		Total Project Water Demand:	48,086
		TOTAL CUMULATIVE:	***7,688,798***
		Project % of Cumulative	**0.6%**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day, stu = student

[a] ***Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, April 6, 2012, written correspondence provided by LADWP.***

[b] *Uses not listed are closest to the land uses listed in the Sewer Generation Rates table.*

[c] *Dwelling units include apartments and condominiums. Water demand rate is based on a two-bedroom dwelling unit for a conservative analysis.*

[d] *Fast-food Restaurants and Restaurant uses assume indoor seating for a conservative analysis. The number of seats were calculated based on 15 sf/seat and assuming seating area encompasses 2/3 of restaurant, while 1/3 of restaurant space is utilized for kitchen space.*

Parker Environmental Consultants, 2017.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XVII(b), above, the sewage flow would ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project.[62] Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 108 related projects would further increase regional demands on the HWRP's capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles. The related projects cumulative wastewater demand can be seen in Table III-40, Projected Cumulative Wastewater Generation. As shown in Table III-40, the net wastewater demand of the 108 related projects and the Proposed Project totals approximately 6,407,330 gpd or 6.4 mgd. Of the 175 mgd available in HWRP, the cumulative demand of 6.4 mgd accounts for approximately 3.7% percent of the available capacity and would not significantly reduce its capacity. As such, cumulative impacts with respect to wastewater demand would be less than significant.

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[62] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater: About Wastewater, website: http://lasewers.org/treatment_plants/hyperion/tour/index.htm, accessed October 2016.*

Table III-40
Estimated Cumulative Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Related Projects			
Dwelling Units [c]	28,598 du	150 gpd/du	4,289,700
Banquet Room	63,157 sf	0.35 gpd/sf	22,105
Bar/Lounge	24,864 sf	0.72 gpd/sf	17,902
Coffee Shop	1,200 sf	0.72 gpd/sf	864
Fast-Food Restaurant (3,500 sf) [d]	156 seats	25 gpd/seat	3,900
Gymnasium	34,278 sf	0.2 gpd/sf	6,856
Hotel	4,637 rooms	120 gpd/room	556,440
Medical Office	71,385 sf	0.25 gpd/sf	17,846
Museum	17,600 sf	0.03 gpd/sf	528
Office	2,870,132 sf	0.12 gpd/sf	344,416
Rest Home/Assisted Living	160 bed	70 gpd/bed	11,200
Restaurant (509,022 sf) [d]	22,623 seat	30 gpd/seat	678,690
Retail	2,154,270 sf	0.025 gpd/sf	53,857
School: Day Care	71 children	9 gpd/child	639
School: College/University	21,300 students	16 gpd/student	340,800
School: Elementary	1,472 students	9 gpd/student	13,248
Theater	2,756 seat	3 gpd/seat	8,268
		Total Related Projects Wastewater Generation:	**6,367,259**
		Total Project Wastewater Generation:	40,071
		TOTAL CUMULATIVE:	**6,407,330**
		Project % of Cumulative:	**0.6%**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day

[a] *City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, April 6, 2012, written correspondence provided by LADWP.*

[b] *Uses not listed are closest to the land uses listed in the Sewer Generation Rates table.*

[c] *Dwelling units include apartments and condominiums. Water demand rate is based on a two-bedroom dwelling unit for a conservative analysis.*

[d] *Fast-food Restaurants and Restaurant uses assume indoor seating for a conservative analysis. The number of seats were calculated based on 15 sf/seat and assuming seating area encompasses 2/3 of restaurant, while 1/3 of restaurant space is utilized for kitchen space.*

Parker Environmental Consultants, 2017.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following

factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.[63] State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[64]

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

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[63] *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

[64] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. 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 72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. The Chiquita Canyon Landfill has a remaining capacity of 758,146 tons.[65] For the past decade, Chiquita Canyon Landfill has been working with the County of Los Angeles on an Environmental Impact Report (EIR) and a new Conditional Use Permit (CUP) application. During this period, the Chiquita Canyon Landfill reached the permitted disposal limit of 23 millions tons that was approved in 1997. The Director of Regional Planning granted Chiquita Canyon Landfill a limited waiver to continue operation of the landfill until necessary public hearings for the EIR and new CUP are completed. If the new CUP is not approved, then the landfill would close. The Proposed Project would be allowed to dispose solid waste at the Chiquita Canyon Landfill during the EIR and CUP process given that the landfill would not be required to close. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 48,114,000 tons (a 45-year life expectancy based on 2015 average daily disposal of 3,446 tons per day or 15 years based on the maximum permitted rate of disposal of 10,000 tons per day).[66]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the demolition of existing structures and the development size of 328,290 square feet of residential floor area and 25,810 square feet of retail floor area, it is estimated that the demolition and construction for the Proposed Project would generate approximately 6,025 tons of debris during the demolitions and construction process (see Table III-41). In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

As shown in Table III-42, Estimated Operational Solid Waste Generation, the Proposed Project's net generation during operation would be 3,740 pounds per day. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed

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[65] *County of Los Angeles Department of Public Works, 2015 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, December 2016.*

[66] *Ibid.*

Project is within the available capacities at area landfills and project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than 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 Proposed Project would generate solid waste that is typical of a residential mixed-use building with ground-floor retail and creative office and would comply with all federal, state, and local statutes and regulations regarding proper disposal. Therefore, the Project's solid waste impacts would be less than significant.

Table III-41
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a] (lbs./sf)	Generated Waste (tons)
Demolition (Approximate) [b]			
Existing Uses (Non Residential)	67,820 sf	155 lbs/sf	5,256
Total Project Demolition Debris Generation:			**5,256**
Construction			
Multi-Family Residential	328,290 sf	4.38 lbs/sf	719
Creative Office / Retail Spaces	25,810 sf	3.89 lbs/sf	50
Total Project Construction Debris Generation:			**769**
Proposed Project NET TOTAL:			**6,025**

Notes:
sf = square feet; lbs = pounds
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *For a conservative analysis, the entirety of the Project Site square footage was used to calculate demolition debris.*
Source: Parker Environmental Consultants, 2017.

Table III-42
Estimated Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
Commercial/Retail (58,220 sf)	152 emp [b]	10.53 lbs/employee/day	1,601
Proposed Project			
Multi-Family Residential	379 du	12.23 lbs/du/day	4,635
Creative Office/Retail (25,810 sf)	67 emp [b]	10.53 lbs/employee/day	706
		Total Project Solid Waste Generation:	**5,341**
		Less Existing Uses:	*-1,601*
		NET TOTAL Solid Waste Generation:	**3,740**

Notes:
sf =square feet; du = dwelling units, emp = employee
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 383 square feet community retail/commercial space. Source: U.S. Green Building Code, Building Area per Employee by Business Type Table, May 13, 2008.*
Source: Parker Environmental Consultants, 2017.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 108 related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Although there are several proposals for new landfills in the region, there are currently few viable options for City of Los Angeles waste past 2029. Table III-43 shows the cumulative solid waste generation in pounds per day. The cumulative operational solid waste generation of the related projects and Proposed Project would contribute approximately 465,177 pounds of solid waste per day (85,045 tons of solid waste per year), which represents a fraction of one percent of the current remaining capacity of the Sunshine Canyon Landfill and the Chiquita Canyon Landfill, which combined have a remaining permitted capacity of approximately 72.6 million tons.

While in the short-term adequate landfill capacity exists to accommodate solid waste generated by the Proposed Project, in the future there would be a need to develop additional landfills and other waste disposal options to accommodate future growth. These options include diversion or transformation as the preferred methods for addressing solid waste and specific and practical applications (i.e., market development, public education and public policy initiatives) within the City.

The City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

Table III-43
Cumulative Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Related Projects			
Dwelling Units [b]	28,758 du	12.23 lbs/du/day	351,710
Hotel	4,637 room	2 lbs/room/day	9,274
Retail / Commercial (2,827,283 sf) [c]	7,382 emp	10.53 lbs/employee/day	77,732
Medical Office	71,385 sf	0.007 lbs/sf/day	500
Office	2,870,132 sf	0.006 lbs/sf/day	17,221
Schools	714,284 sf	0.007 lbs/sf/day	5,000
		Related Projects Total:	***461,437***
		Proposed Project Net Total:	3,740
		CUMULATIVE TOTAL:	**465,177**
		Project % of Cumulative:	**0.8%**

Notes:
sf =square feet; du = dwelling units; emp = employee
Uses not listed are estimated by the closest type of use available in the table.
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Dwelling units include condominiums, multi-family residential units, assisted living, and student apartments.*
[c] *Generation rates are based on 1 employee per 383 square feet of retail/commercial for a conservative estimate.*
Conversions of floor area per occupant based on California Building Code (2013), Ch.10, Table 1004.1.2.
Parker Environmental Consultants, 2017.

As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65 percent. The City is exceeding the state-mandated diversion goal of 50 percent by 2000 set by the California Integrated Waste Management Act (CIWMA) of 1989.[67] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, back yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, the

[67] *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June 14 2005.*

Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less-than-significant cultural resource impacts with implementation of regulatory compliance measures as identified within this expanded Initial Study / Mitigated Negative Declaration analysis. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, with incorporation of regulatory compliance and Mitigation Measure BIO-1, as identified within this expanded Initial Study / Mitigated Negative Declaration analysis, a less than significant impact would occur.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with the related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural quality, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less than Significant Impact. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human

beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified within this expanded Initial Study / Mitigated Negative Declaration analysis.

APPENDIX F: ENERGY CONSERVATION

Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal:

1. Decreasing overall per capita energy consumption,

2. Decreasing reliance on fossil fuels such as coal, natural gas and oil, and

3. Increasing reliance on renewable energy sources.

The Proposed Project would develop a mixed-use building on an infill site, which would contribute to the revitalization of the Central City Community Plan area. As a mixed-use project, with both residential and commercial land uses, the Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential and Nonresidential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2016 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2016 Standards is January 1, 2017.[68] The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

[68] *California Energy Commission, 2016 Building Energy Efficiency Standards, Website: http://www.energy.ca.gov/title24/2016standards/, accessed January 2017.*

Existing Infrastructure

As discussed in written correspondence with the Department of Water and Power[69] the Project Site is served by an underground 4.8-kV along Main Street adjacent to the Project Site. There are also several overhead/underground 4.8-kV circuits adjacent to the Project Site along 11th Street. There are no 34.5-kV circuits adjacent to the Project Site. The nearest underground 34.5-kV circuit is: 1) South of the Project Site in the vicinity of 12th Street and Main Street and 2) East of the Project Site in the vicinity of 11th Street and Los Angeles Street. The LADWP may require space for a minimum of two pads for electoral equipment within the property with the required clearance, and the LADWP will require accessibility of the equipment. The Proposed Project will require onsite transformation and may require underground line extension on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

Electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.[70]

Energy Consumption

a) Construction

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Although exact figures cannot be determined until building permits are issued, it is expected that the heavy equipment involved in the demolition, excavation, and construction phases of the Proposed Project would include crawler-excavators, loaders, bulldozers, graders, water trucks, street sweepers, tractors, cranes, and fork lifts. In addition, dump trucks would be used to haul excavated earth and building material to the Sunshine Canyon Landfill, Chiquita Canyon Landfill, and Waste Management Downtown Diversion Center throughout the demolition, grading, and excavation phases. It is assumed that the majority of hauling would occur during the demolition and excavation phases, which are expected to occur during the first portion of the construction period.

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[69] *City of Los Angeles, Los Angeles Department of Water and Power, written correspondence, dated December 26, 2016.*

[70] *Ibid.*

Construction of the Proposed Project would require the export of soil, asphalt, and debris from the Project Site. The demolition/excavation phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the excavation, grading, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process.

Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration, the amount of diesel and petroleum-based gasoline (E10)[71] consumed can be estimated based on CO2 emissions.[72] Burning one gallon of diesel fuel generates approximately 22.38 pounds of CO2. Burning one gallon of petroleum-based gasoline with 10 percent ethanol content (E10) produces approximately 17.68 pounds of CO2 emissions. Based on the U.S. Energy Information Administration fuel consumption factors identified above, and the Proposed Project's estimated CO2e emissions presented in Section VII. Greenhouse Gas Emissions, it is estimated that the construction of the Proposed Project would consume approximately 221,335 gallons of fuel, including approximately 38,316 gallons of diesel fuel and 183,018 gallons of gasoline.[73]

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Accordingly, energy demands during construction would be less than significant.

b) Operation

As shown in Table III-44, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,693,289 kilowatts per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2014, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent

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[71] *Blends of petroleum-based gasoline with 10% ethanol, commonly referred to as E10, account for more than 95% of the fuel consumed in motor vehicles with gasoline engines, U.S. Energy Information Administration, website: http://www.eia.gov/todayinenergy/detail.php?id=26092, accessed February 2017.*

[72] *U.S. Energy Information Administration, website: http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11, accessed February 2017.*

[73] *Refer to Fuel Consumption Calculations*

reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.[74]

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[75] Compliance with the LID Ordinance would ensure reduction of the Proposed Project's overall per capita energy consumption. Lastly, the Proposed Project would be expected to include energy conservation features. Specifically, the residential units would include low-flow water features and energy conservation appliances. Thus, the Proposed Project's 379 residential units would incorporate energy conservation features.

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[74] *City of Los Angeles, Los Angeles Department of Water and Power, written correspondence, dated December 26, 2016.*

[75] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

Table III-44
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Generation Rate[a]	Unit	Total (kilowatt hours/year)
Existing Electricity Demand				
Commercial	58,220 sf	13.55	kWh/sf/year	788,881
Existing Uses Total Gross Increase in Electricity Demand				**788,881**
Proposed Project				
Creative Office/Retail	25,810 sf	13.55	kWh/sf/year	349,726
Residential Uses	379 du	5,626.5	kWh/unit/year	2,132,444
Proposed Project Total Gross Increase in Electricity Demand				**2,482,170**
Less Prior Electricity Demand Subtotal				*(788,881)*
Proposed Project Total Net Electricity Demand				**1,693,289**

Notes:
du: dwelling unit; sf: square feet; kWh = kilowatt-hour
[a] SCAQMD CEQA Air Quality Handbook, 1993.
Source: Parker Environmental Consultants, 2017.

ii) Natural Gas

Natural gas for the Project Site is provided by Southern California Gas Company ("SCG"). For the area served by SCG, residential demand for natural gas is expected to decline from 247 billion cubic feet (cf) in 2014 to 223 billion cubic feet (cf) by 2035. This decrease can be attributed to the fact that natural gas consumption is becoming increasingly more efficient, which leads to a decrease in overall natural gas consumption. Thus, with the natural gas consumption becoming more efficient and decreasing, the SCG's projection for natural gas also decreases. However, though the SCG's projection for the residential demand for natural gas will decrease between 2014 and 2035 due to more efficient natural gas consumption, as discussed above in the Environmental Setting subsection, the SCG's natural gas storage capacity allocated to residential, small industrial, and commercial customers was 79 billion cubic feet in

2008 and has increased to 83 billion cubic feet (cf) in 2014.[76,77] SCG does not provide projections for natural gas capacity. As shown in Table III-45, below, the natural gas consumption as a result of the residential uses' operation of the Proposed Project, approximately 1,592,764 cubic feet per month, would represent 0.0019 percent of the SCG's existing natural gas storage capacity and therefore, would be within the SCG's existing natural gas storage capacity of 83 billion cubic feet as of 2014. □The non-residential markets' demand for natural gas is expected to increase from 118 billion cubic feet 2014 to

[76] *California Gas and Electric Utilities, 2008 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2008_CGR.pdf, accessed February 2017.*

[77] *California Gas and Electric Utilities, 2014 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed February 2017.*

122 billion cubic feet by 2035.[78] The Modified Project's commercial uses' increase in natural gas consumption would be approximately 77,430 feet per month.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2014, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption.

Table III-45
Estimated Natural Gas Consumption by the Proposed Project

Land Use	Size	Generation Rate[a]	Unit	Total (cubic feet/month)
Existing Natural Gas Consumption				
Commercial	58,220 sf	3	cf/sf/month	174,660
			Existing Natural Gas Consumption Subtotal	**174,660**
Proposed Project Gas Consumption				
Creative Office/Retail	25,810 sf	3	cf/sf/month	77,430
Residential Uses	397 du	4,012	cf/unit/month	1,592,764
			Proposed Project Total Gross Increase in Natural Gas Consumption	**1,670,194**
			Less Existing Natural Gas Consumption Subtotal	*(174,660)*
			Proposed Project Total Net Increase in Natural Gas Consumption	**1,495,534**

Notes:
du: dwelling unit; sf: square feet
[a] *SCAQMD CEQA Air Quality Handbook, 1993.*
Source: Parker Environmental Consultants, 2017.

Fossil Fuels

Approximately 174,242 gallons of gasoline fuel would be utilized by mobile sources annually during operation of the Proposed Project.[79] However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. The Project Site is located in Downtown Los Angeles, which is at the hub of the regional transit network in the Los Angeles area. 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 and Commuter Express, Santa Monica Big Blue Bus ("BBB"), and the City of Gardena ("GTrans"). The Project Site's proximity to the Pico Rail Station, approximately one-half mile west, and

[78] *Ibid*

[79] *Refer to Fuel Consumption Calculations included in case file.*

the 7th Street / Metro Center Station, approximately three-quarters mile north, provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a "reasonable walking distance" (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794).[80] The LADOT Dash line (Dash Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11th Street. Due to its proximity to the bus stops Pico Rail Station aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Additionally, as an infill development, Proposed Project will incorporate a mix of creative office, retail and residential uses. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Traffic Study (see Appendix F of this Addendum), because the commercial component of the Proposed Project would be primarily serving to the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Proposed Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. For the trips generated by the residential uses, a reduction of 10% for internal trips from the Proposed Project, 15% for use of transit and 5% for walk-ins from the surrounding area were applied. For the trips generated by the commercial uses, a reduction of 10% for internal trips from the Proposed Project, 15% for use of transit and walk-ins from the surrounding area, 5% for walk-ins from the surrounding area and a pass-by rate of 50% were applied. The reduction in vehicle trips, due to the Proposed Project's mixed-use programming and the Project Site's location in a transit-oriented district, would therefore decrease the Proposed Project's reliance on fossil fuels.

Renewable Energy

With respect to renewable energy, the Proposed Project includes the following features:

- *Proximity to mass transit:* The Project Site is an infill site within a transit priority area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.

- *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with commercial buildings, which is located in a highly developed area of downtown Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

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[80] *Crain & Associates, Transportation Impact Study for the Proposed 1100 S. Main Street Mixed-Use Project, City of Los Angeles, February 9, 2017.*

- *Trip Reduction:* In addition to its location in a transit priority area, the Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 51 short-term bicycle parking spaces and 392 long-term bicycle parking spaces, for a total of 443 bicycle parking spaces. The Proposed Project proposes to provide 443spaces.

- *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to exceed Title 24 2013 standards and include ENERGY STAR appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy.

IV. PREPARERS AND PERSONS CONSULTED

LEAD AGENCY

City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

Jennifer Caira, City Planner

PROJECT APPLICANT

Frontier Holdings East, LLC, Frontier Holdings South LLC and Regal Group LLC
888 South Figueroa Street, Suite 1900
Los Angeles, CA 90017

Daniel Taban

PREPARERS OF THE INITIAL STUDY

Environmental Consultants (CEQA)

Parker Environmental Consultants
23822 Valencia Boulevard, Suite 301
Valencia, CA 91355

Shane E. Parker, President
Jennifer Kelley, Environmental Analyst
Mariana Zimmermann, Associate Environmental Planner
Elise Lorenzana, Assistant Environmental Planner

Land Use Consultants

Psomas
555 S. Flower Street, Suite 4300
Los Angeles, CA 90071

Joe Miller
Anne Williams

Architect

MVE + Partners
1900 Main Street
Irvine, CA 92614

Matthew McLarand
Sherwin Pineda

Landscape Architect

LRM Landscape Architects
10335 Jefferson Boulevard,
Culver City, CA 90232

Charles Elliott
Kathy Wishard

Traffic Consultant

Crain & Associates
300 Corporate Pointe, Suite 470
Culver City, CA 90230

Ryan Kelly

Geotechnical Engineers

Geotechnologies, Inc.
439 Western Avenue
Glendal, CA 91201

Gregorio Varela, RCE 81201

GeoKinetics
77 Bunsen
Irvine, CA 92618

Kevin J. Lea, Senior Project Engineer, CGE

Environmental Engineer

Partner Engineering and Science, Inc.
2154 Torrance Boulevard, Suite 200
Torrance, CA 90501

Vivianne Bisson, Environmental Professional
Steve Kovach, Senior Author

Arborist

The Tree Resource
P.O. Box 49314, Los Angeles, CA 90049

Lisa Smith, RCA #464

V. REFERENCES AND ACRONYMS

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2. ACRONYMS AND ABBREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City Zoning Code	City of Los Angeles Planning and Zoning Code
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone

FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development

LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million

PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants

TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System