



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 Wilshire Community Plan Area

2900 Wilshire Boulevard Project

DIR-2016-755-DD-SPR

ENV-2016-756-MND

Project Location: 2902 – 2958 Wilshire Boulevard, 2807 – 2851 Sunset Place, and 667 S. Hoover Street, Los Angeles, CA 90010

Council District: 10

Project Description: The Proposed Project involves demolition of two one-story commercial buildings, a surface parking lot, and a billboard for the construction of a 23-story mixed-use building (268.5 feet in height), which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. A total of 1,124 parking spaces would be provided on-site in the 6 above grade parking levels. The Proposed Project would provide a total of 724 bicycle parking spaces, which includes 72 short-term and 652 long-term spaces. The Project proposes to provide 64,440 square feet of open space and amenity areas. The Proposed Project would include 657,514 square feet of developed floor area resulting in a floor area ratio (FAR) of 5.1:1. The allowable FAR for the Project Site is 6:1.

The Applicant is requesting the following discretionary actions: (1) Site Plan Review and (2) a 10% reduction in total open space pursuant to LAMC Section 12.21.G.3. The Applicant will also 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 (for the export of approximately 76,441 cy of soil), the removal/replacement of 22 street trees within the public right-of way, and building and tenant improvements for the Project Site.

APPLICANT:
Jamison Properties, LP

PREPARED BY:
Parker Environmental Consultants

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

March 2, 2017

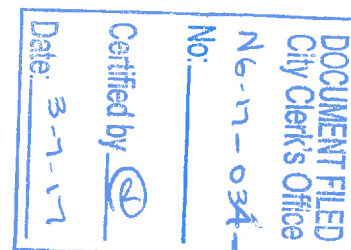


TABLE OF CONTENTS

Mitigated Negative Declaration Form/CEQA Initial Study Checklist (front insert)

I.	INTRODUCTION	I-1
II.	PROJECT DESCRIPTION	II-1
	A. PROJECT LOCATION	II-1
	B. PROJECT CHARACTERISTICS	II-13
	C. ENTITLEMENT REQUESTS.....	II-49
III.	ENVIRONMENTAL IMPACT ANALYSIS	III-1
	I. AESTHETICS.....	III-1
	II. AGRICULTURE	III-7
	III. AIR QUALITY.....	III-9
	IV. BIOLOGICAL RESOURCES	III-17
	V. CULTURAL RESOURCES.....	III-21
	VI. GEOLOGY AND SOILS.....	III-25
	VII. GREENHOUSE GAS EMISSIONS	III-31
	VIII. HAZARDS AND HAZARDOUS MATERIALS	III-39
	IX. HYDROLOGY AND WATER QUALITY	III-45
	X. LAND USE AND PLANNING.....	III-53
	XI. MINERAL RESOURCES.....	III-69
	XII. NOISE.....	III-69
	XIII. POPULATION AND HOUSING.....	III-87
	XIV. PUBLIC SERVICES.....	III-92
	XV. RECREATION	III-103
	XVI. TRANSPORTATION AND TRAFFIC	III-105
	XVII. UTILITIES AND SERVICE SYSTEMS.....	III-120
	XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.....	III-133
IV.	PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED	IV-1
V.	REFERENCES, ACRONYMS AND ABBREVIATIONS	V-1

List of Figures

Figure II-1: Project Location Map.....	II-3
Figure II-2: Zoning and General Plan Land Use Designations	II-5
Figure II-3: Aerial Photograph and Photograph Location Map.....	II-8
Figure II-4: Photographs of the Project Site	II-9
Figure II-5: Photographs of the Surrounding Land Uses.....	II-10
Figure II-6: Project Vicinity – Proximity to Transit Services	II-12
Figure II-7: Plot Plan	II-14
Figure II-8: Ground Floor Plan.....	II-15
Figure II-9: Level 2 Plan.....	II-16
Figure II-10: Level 3 Plan.....	II-17
Figure II-11: Level 4 Plan.....	II-18
Figure II-12: Level 5 Plan.....	II-19
Figure II-13: Level 6 Plan.....	II-20
Figure II-14: Level 7 Plan.....	II-21
Figure II-15: Mid-Level Tower Plan	II-22
Figure II-16: Level 24 Upper Amenity Plan.....	II-23
Figure II-17: Upper Level Tower Plan	II-24
Figure II-18: Penthouse Level Plan	II-25
Figure II-19: Roof Plan.....	II-26
Figure II-20: North Elevation	II-28
Figure II-21: East Elevation.....	II-29
Figure II-22: South Elevation	II-30
Figure II-23: West Elevation	II-31
Figure II-24: Building Section.....	II-32
Figure II-25: Wilshire Boulevard Perspective (Aerial View).....	II-33
Figure II-26: Hoover Street – Wilshire Boulevard Perspective (Aerial View)	II-34
Figure II-27: Sunset Place Perspective (Aerial View).....	II-35

Figure II-28: Ground Floor & Level 2 Landscape Plan II-38
 Figure II-29: Level 7 Amenity Podium Landscape Plan II-39
 Figure II-30: Related Project Location Map..... II-48
 Figure III-1: Noise Monitoring and Sensitive Receptor Location Map III-74

List of Tables

Table II-1: Summary of the Project Site..... II-1
 Table II-2: Proposed Development Program II-13
 Table II-3: Summary of Required and Proposed Open Space Areas II-36
 Table II-4: Summary of Required and Proposed Vehicle Parking Spaces II-37
 Table II-5: Summary of Required and Proposed Bicycle Parking Spaces II-37
 Table II-6: Related Projects List II-42
 Table III-1: Estimated Peak Daily Construction Emissions III-11
 Table III-2: Existing Daily Operational Emissions from the Project Site III-12
 Table III-3: Proposed Project Estimated Daily Operational Emissions III-13
 Table III-4: Localized On-Site Peak Daily Construction Emissions III-15
 Table III-5: Climate Change Scoping Plan 2020 Emissions Target..... III-32
 Table III-6: Existing Project Site Greenhouse Gas Emissions III-35
 Table III-7: Project Construction-Related Greenhouse Gas Emissions III-35
 Table III-8: Project Operational Greenhouse Gas Emissions III-37
 Table III-9: City of Los Angeles General Plan Consistency Analysis III-55
 Table III-10: Project Consistency with Applicable Objectives and Policies of the Wilshire
 Community Plan Land Use Element for Residential and Commercial Land Uses III-58
 Table III-11: Project Consistency with Applicable Goals of the Redevelopment Plan III-62
 Table III-12: Typical Outdoor Construction Noise Levels..... III-72
 Table III-13: Existing Ambient Daytime Noise Levels in Project Site Vicinity III-75
 Table III-14: Estimated Exterior Construction Noise at Nearest Sensitive Receptors III-75
 Table III-15: Vibration Source Levels for Construction Equipment..... III-78
 Table III-16: Vibration Damage Potential Threshold Criteria III-79
 Table III-17: Project Vibration Impacts on Adjacent Structures and Historic Resources..... III-80

Table III-18: Estimated Vibration Levels at Nearest Sensitive Receptors	III-81
Table III-19: Community Noise Exposure (CNEL)	III-82
Table III-20: Project Roadway Noise Impacts	III-83
Table III-21: Cumulative Roadway Noise Impacts	III-86
Table III-22: SCAG Population and Housing Projections for the City of Los Angeles and SCAG Region	III-88
Table III-23: Projected Cumulative Housing Units.....	III-91
Table III-24: Olympic Community Police Station Crime Statistics	III-96
Table III-25: Resident Schools Serving the Project Site	III-97
Table III-26: Proposed Project Estimated Student Generation.....	III-98
Table III-27: Projected Cumulative Student Generation	III-99
Table III-28: Recreation and Park Facilities Within the Project Area.....	III-101
Table III-29: Definition of Significant Impact at Intersection.....	III-106
Table III-30: Existing Condition – Intersection Level of Service	III-107
Table III-31: Project Trip Generation Estimates	III-109
Table III-32: Existing With Project Condition - Level of Service Summary.....	III-110
Table III-33: Existing with Project Conditions - Unsignalized Intersection Signal Warrant Analysis	III-111
Table III-34: Future with Project Condition - Level of Service Summary.....	III-112
Table III-35: Future with Project Conditions - Unsignalized Intersection Signal Warrant Analysis	III-113
Table III-36: Proposed Project Estimated Water Demand	III-122
Table III-37: Proposed Project Estimated Wastewater Generation.....	III-124
Table III-38: Projected Cumulative Water Demand.....	III-127
Table III-39: Projected Cumulative Wastewater Generation	III-128
Table III-40: Estimated Construction and Demolition Debris	III-130
Table III-41: Expected Operational Solid Waste Generation.....	III-131
Table III-42: Cumulative Operational Solid Waste Generation	III-132

APPENDICES

APPENDIX A: AIR QUALITY MODELING WORKSHEETS

APPENDIX B: GEOTECHNICAL REPORT

Geotechnologies, Inc., Preliminary Summary of Geotechnical Explorations and Observations, Proposed Mixed-Use Development, 2900 Wilshire Boulevard, Los Angeles, California, dated March 3, 2016.

APPENDIX C: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX D: ENVIRONMENTAL SITE ASSESSMENT

D.1: EP Associates, Phase I Environmental Site Assessment, 16-Lot Commercial Property, 2926 and 2950 Wilshire Boulevard, Los Angeles, California, dated April 18, 2008.

D.2: Advanced Geotechniques, Report of Environmental Site Assessment Phase II, Existing Commercial Property 2900 – 2950 Wilshire Boulevard Wilshire Boulevard, Los Angeles, California, dated June 16, 2008.

D.3: Eviron Phase Consulting Co., Additional Environmental Site Assessment, Midway Car Rental, 2902 Wilshire Boulevard, Los Angeles, California, dated August 25, 2015.

APPENDIX E: NOISE MONITORING DATA AND CALCULATON WORKSHEETS

APPENDIX F: TRAFFIC STUDY

Fehrs & Peers, 2900 Wilshire Project, Draft Transportation Impact Analysis, dated March 2016.

APPENDIX G: REPORT FOR STORM DRAIN RELOCATION

Psomas, Preliminary Report for the Relocation of a 63 Inch Storm Drain Located within the Development Site of Residential and Commercial Development Southwest Corner of Wilshire Boulevard and Hoover Street, City of Los Angeles, California, dated May 15, 2006.

APPENDIX H: WATER SUPPLY ASSESSMENT

Los Angeles Department of Water and Power, October 2016.

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: 10 – Herb J. Wesson, Jr.
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PROJECT TITLE: 2900 Wilshire Boulevard Project	ENVIRONMENTAL CASE: ENV-2016-756-MND	CASE NO.: DIR-2016-755-DD-SPR
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PROJECT LOCATION 2902 – 2958 Wilshire Boulevard, 2807 – 2851 Sunset Place, and 667 S. Hoover Street

PROJECT DESCRIPTION: Project Description: The Proposed Project involves demolition of two one-story commercial buildings, a surface parking lot, and a billboard for the construction of a 23-story mixed-use building (268.5 feet in height), which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. A total of 1,124 parking spaces would be provided on-site in the 6 above grade parking levels. The Proposed Project would provide a total of 724 bicycle parking spaces, which includes 72 short-term and 652 long-term spaces. The Project proposes to provide 64,440 square feet of open space and amenity areas. The Proposed Project would include 657,514 square feet of developed floor area resulting in a floor area ratio (FAR) of 5.1:1. The allowable FAR for the Project Site is 6:1.

The Applicant is requesting the following discretionary actions: (1) Site Plan Review and (2) a 10% reduction in total open space pursuant to LAMC Section 12.21.G.3. The Applicant will also 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 (for the export of approximately 76,441 cy of soil), the removal/replacement of 22 street trees within the public right-of-way, and building and tenant improvements for the Project Site.


NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
 Jamison Properties, LP
 3470 Wilshire Boulevard, Suite 700
 Los Angeles, CA 90010

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 will 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 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 Joe Luckey	TITLE Planning Assistant	TELEPHONE NUMBER (213) 978-1340
ADDRESS 200 North Spring Street, 7 th Floor Los Angeles, CA 90012	SIGNATURE (Official) 	DATE APRIL 10, 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 10	DATE: March 2, 2017
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2016-756-MND	RELATED CASES: DIR-2016-755-DD-SPR	
PREVIOUS ACTIONS CASE NO. ENV-2008-4960-EAF, ENV-2008-4960-EIR	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.	
<p>PROJECT DESCRIPTION: The Proposed Project involves demolition of two one-story commercial buildings, a surface parking lot, and a billboard for the construction of a 23-story mixed-use building (268.5 feet in height), which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. A total of 1,124 parking spaces would be provided on-site in the 6 above grade parking levels. The Proposed Project would provide a total of 724 bicycle parking spaces, which includes 72 short-term and 652 long-term spaces. The Project proposes to provide 64,440 square feet of open space and amenity areas. The Proposed Project would include 657,514 square feet of developed floor area resulting in a floor area ratio (FAR) of 5.1:1. The allowable FAR for the Project Site is 6:1.</p> <p>The Applicant is requesting the following discretionary actions: (1) Site Plan Review and (2) a 10% reduction in total open space pursuant to LAMC Section 12.21.G.3. The Applicant will also 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 (for the export of approximately 76,441 cy of soil), the removal/replacement of 22 street trees within the public right-of-way, and building and tenant improvements for the Project Site.</p>		
<p>ENVIRONMENTAL SETTING: The Project Site includes three parcels (Assessor Parcel No. 5077-013-034, 5077-013-035, and 5077-013-036) that includes 128,994 square feet of lot area (2.96 acres). The Project Site is currently occupied by surface parking and two one-story commercial buildings. The surrounding properties are developed with a public park, court building, and mixed use commercial, office, and multiple family residential uses. Further details are provided in the expanded IS/MND analysis (attached).</p>		
PROJECT LOCATION: 2902 – 2958 Wilshire Boulevard, 2807 – 2851 Sunset Place, and 667 S. Hoover St.		
COMMUNITY PLAN AREA: Wilshire STATUS: <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> Adopted (2001)	<input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan	AREA PLANNING COMMISSION: Central CERTIFIED NEIGHBORHOOD COUNCIL: Wilshire Center – Koreatown
EXISTING ZONING: C4-2	MAX DENSITY ZONING: 6:1	LA River Adjacent: No
GENERAL PLAN LAND USE: Regional Center Commercial	MAX. DENSITY PLAN: 6:1	PROPOSED PROJECT DENSITY: 5.1:1

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

Planning Assistant
Title

213-978-1340
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 than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to

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.

<input type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES <input type="checkbox"/> AIR QUALITY <input checked="" type="checkbox"/> BIOLOGICAL RESOURCES <input type="checkbox"/> CULTURAL RESOURCES <input type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> GREENHOUSE GAS EMISSIONS <input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input checked="" type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input checked="" type="checkbox"/> TRANSPORTATION AND TRAFFIC <input type="checkbox"/> UTILITIES <input checked="" type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)	
PROPONENT NAME: Jamison Properties, LP	PHONE NUMBER: (213) 365-5000
APPLICANTS ADDRESSES: 3470 Wilshire Blvd, Suite 700 Los Angeles, CA 90010	
AGENCY REQUIRING CHECKLIST: City of Los Angeles Department of City Planning	DATE SUBMITTED: February 2, 2017
PROPOSAL NAME (If Applicable): 2900 Wilshire Boulevard Project	

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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.</p>					
I. AESTHETICS					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD AIR QUALITY MANAGEMENT PLAN OR CONGESTION MANAGEMENT PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV. BIOLOGICAL RESOURCES					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS					
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	STRONG SEISMIC GROUND SHAKING?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	LANDSLIDES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS					
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	ENVIRONMENT?				
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES					

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. PUBLIC SERVICES					
a.	FIRE PROTECTION?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	POLICE PROTECTION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	SCHOOLS?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	PARKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XV. RECREATION					
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVI. TRANSPORTATION AND TRAFFIC					
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVII. UTILITIES					

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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-2016-756-MND** and the associated case(s), **DIR-2016-755-DD-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: Parker Environmental Consultants	TELEPHONE NO.: (661) 257-2282	DATE: February 2, 2017
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APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

	Impact	Explanation	Mitigation Measures
I. AESTHETICS			
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.	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.	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.
d.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
e.	Less Than Significant Impact.	See expanded environmental analysis (attached).	BIO-1, BIO-2
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.	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.
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.

	Impact	Explanation	Mitigation Measures
VII. GREENHOUSE GAS EMISSIONS			
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.
VIII. HAZARDS AND HAZARDOUS MATERIALS			
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.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HAZ-1, HAZ-2
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.
f.	No Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
g.	Less Than Significant Impact.	See expanded environmental analysis (attached).	See T-1, T-2, T-3
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.	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.
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.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HWQ-1
h.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	HWQ-1
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.	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.
XII. NOISE			
a.	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	N-1
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.

	Impact	Explanation	Mitigation Measures
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			
a.i	Potentially Significant Unless Mitigation Incorporated.	See expanded environmental analysis (attached).	T-1, T-2, T-3
a.ii	Less Than Significant Impact.	See expanded environmental analysis (attached).	No mitigation measures are required.
a.iii	Less Than Significant Impact.	See expanded environmental analysis (attached).	HAZ-1, HAZ-2
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.	Less Than Significant Impact.	See expanded environmental analysis (attached).	T-1, T-2, T-3.
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).	HAZ-1, HAZ-2.
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).	T-1, T-2, T-3.
XVII. 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.
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE			
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.	Potentially Significant Unless Mitigation Incorporated.	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 Tree Removal (Non-Protected Trees)

- 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 1:1 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.

BIO-2 (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 or 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**HAZ-1 Construction Activity Near Schools**

- The Applicant and contractors shall maintain ongoing contact with administrator of Rise Kohyang Middle School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)-342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Wilshire Boulevard, adjacent to the school.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Wilshire Boulevard, adjacent to the school, during school hours.

HAZ-2 Schools affected by Haul Route

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

See also T-1, T-2 and T-3.

HYDROLOGY AND WATER QUALITY

HWQ-1 Flooding/Tidal Waves

- The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

LAND USE AND PLANNING

No mitigation measures are required.

MINERAL RESOURCES

No mitigation measures are required.

NOISE

N-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- To the maximum extent practical, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

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

See HAZ-1, HAZ-2, T-1 and T-2.

RECREATION

No mitigation measures are required.

TRANSPORTATION AND TRAFFIC**T-1 Construction Traffic Management Plan**

- A Construction Traffic Management Plan shall be developed by the contractor and approved by the City of Los Angeles to alleviate construction period impacts, which may include but is not limited to the following measures:
 - Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the project site will be off Sunset Place and Hoover Street.
 - Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods of time.
 - As parking lane and sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic and pedestrians around any such closures.
 - If temporary travel lane closures are required, schedule closures to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. If temporary travel lane closures are anticipated, a worksite traffic control plan, approved by the City of Los Angeles, will be implemented to route traffic around any such lane closures.
 - Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
 - Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
 - Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

T-2 Construction Worker Parking Plan

- A Construction Worker Parking Plan shall be developed by the contractor and approved by the City of Los Angeles to ensure that the parking location requirements for construction workers will be strictly enforced. These could include but are not limited to the following measures:
 - During construction activities when construction worker parking cannot be accommodated on the project site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the project site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no parking is permitted on residential streets.

T-3 Construction Plan (Pedestrian Safety)

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks along Wilshire Boulevard, Hoover Street, and Sunset Place throughout all construction phases to the maximum extent feasible. Pursuant to LAMC Section 62.45, permits shall be obtained from the Bureau of Street Services prior to the closure of any adjacent sidewalks and/or construction of protection fences or canopies within the public right-of-way. If temporary sidewalk closures are required, the sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- Protection of pedestrian access shall be provided to LAMC Section 91.3306. The Applicant shall maintain adequate and safe pedestrian protection, including physical separation (i.e., utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closures or blockage, at all times.
- Covered walkways along Wilshire Boulevard, Hoover Street, and Sunset Place shall be provided where pedestrians are exposed to potential injury from falling objects.

UTILITIES AND SERVICE SYSTEMS

No mitigation measures are required.

MANDATORY FINDINGS OF SIGNIFICANCE

See above mitigation measures.

END

I. INTRODUCTION

PROJECT INFORMATION

Project Title: 2900 Wilshire Boulevard Project

Project Location: 2902 – 2958 Wilshire Boulevard, 2807 – 2851 Sunset Place, and 667 S. Hoover Street
Los Angeles, CA 90010

Project Applicant: Jamison Properties, LP
3470 Wilshire Boulevard, Suite 700
Los Angeles, CA 90010

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

PROJECT SUMMARY

The Proposed Project involves demolition of two one-story commercial buildings, a surface parking lot, and a billboard for the construction of a 23-story mixed-use building (268.5 feet in height), which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. A total of 1,124 parking spaces would be provided on-site in the 6 above grade parking levels. The Proposed Project would provide a total of 724 bicycle parking spaces, which includes 72 short-term and 652 long-term spaces. The Project proposes to provide 64,440 square feet of open space and amenity areas. The Proposed Project would include 657,514 square feet of developed floor area resulting in a floor area ratio (FAR) of 5.1:1. The allowable FAR for the Project Site is 6:1.

The Applicant is requesting the following discretionary actions: (1) Site Plan Review and (2) a 10% reduction in total open space pursuant to LAMC Section 12.21.G.3. The Applicant will also 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 (for the export of approximately 76,441 cy of soil), the removal/replacement of street trees within the public right-of way, and building and tenant improvements for the Project Site.

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 Wilshire Center Regional Community Center of Los Angeles, within the boundaries of the Wilshire Community Plan. As shown in Figure II-1, Project Location Map, the Project Site includes three parcels and is approximately 128,994 square feet of buildable lot area (2.96 acres). The Project Site's property addresses, Assessor's Parcel Numbers (APN), land use and lot area are summarized in Table II-1, Summary of the Project Site, below.

**Table II-1
Summary of the Project Site**

Addresses ^a	APN ^a	Existing Land Use ^b	Lot Area (square feet) ^c
2902 W. Wilshire Boulevard 2908 W. Wilshire Boulevard 2916 W. Wilshire Boulevard 2920 W. Wilshire Boulevard 2926 W. Wilshire Boulevard 2932 W. Wilshire Boulevard 2942 W. Wilshire Boulevard 2807 W. Sunset Place 2809 W. Sunset Place 2817 W. Sunset Place 2823 W. Sunset Place 2831 W. Sunset Place 2835 W. Sunset Place 2837 W. Sunset Place 2841 W. Sunset Place 2845 W. Sunset Place	5077-013-034	One-Story Commercial Building and Surface Parking Lot	
667 S. Hoover Street	5077-013-035	Surface Parking Lot	
2950 W. Wilshire Boulevard 2958 W. Wilshire Boulevard 2851 W. Sunset Place	5077-013-036	One-Story Commercial Building and Surface Parking Lot	
Total Lot Area			128,994
<i>Sources:</i>			
^a City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org , accessed March 2016.			
^b Existing Land Uses were determined from a Site visit.			
^c LARGE architecture, October 31, 2016.			

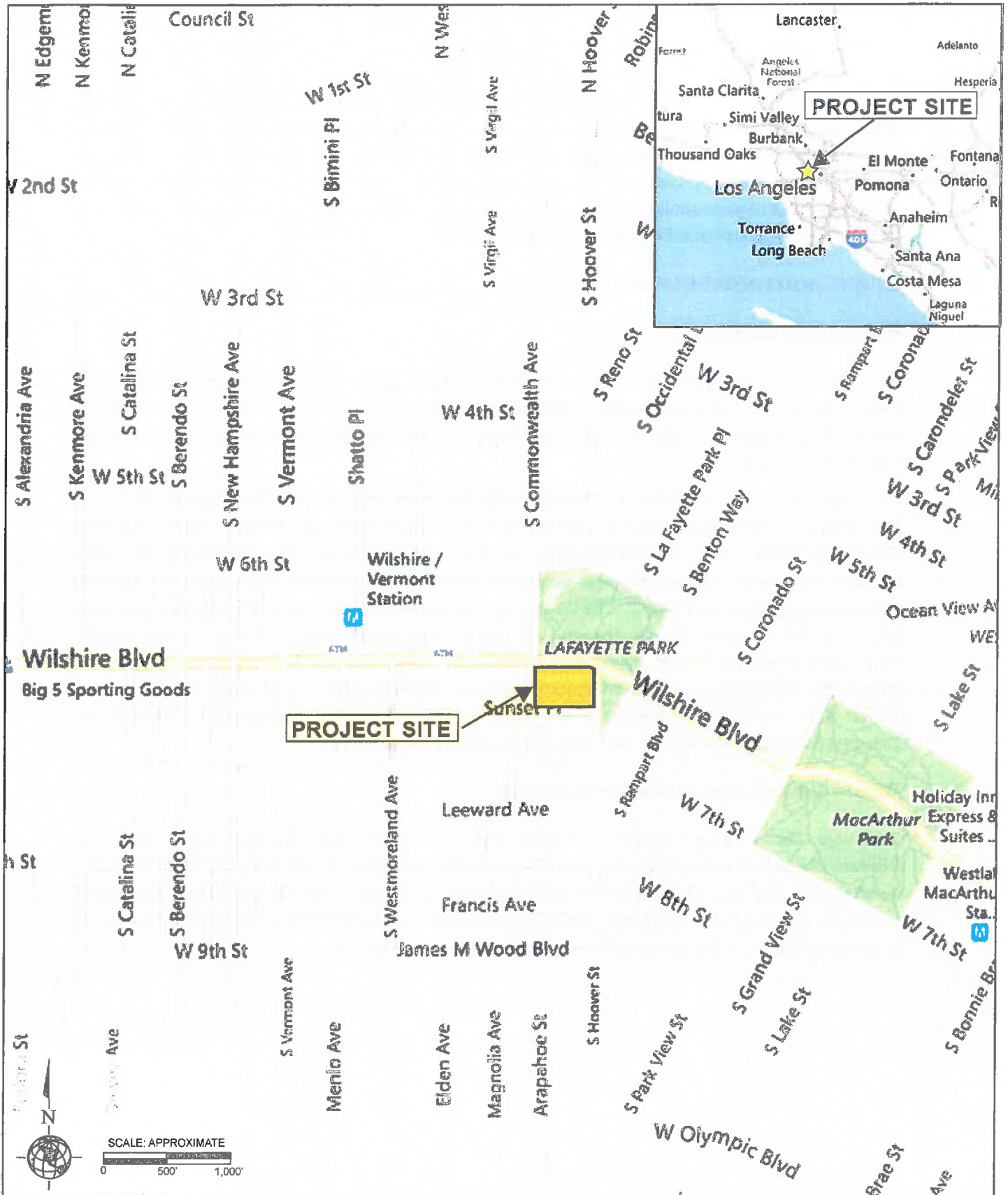
The Project Site is generally bounded by an alley and commercial and multiple-family residential land uses across the alley to the west; Sunset Place and mixed-use commercial office and multiple-family residential land uses across Sunset Place to the south; S. Hoover Street and an extension of Lafayette Park across S. Hoover Street to the east; and Wilshire Boulevard, The Town House (vacant hotel), Lafayette Park, Central Civil West Courthouse, and commercial land uses across Wilshire Boulevard to the north.

REGIONAL AND LOCAL ACCESS

Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Harbor Freeway (I-110). The Hollywood freeway runs in a southeast-northwest direction one mile north of the Project Site. The Santa Monica freeway runs in an east-west direction one and a half miles south of the Project Site and The Harbor/Pasadena freeway runs in a north-south direction one and a half miles east of the Project Site. These three facilities also provide access to the Golden State (I-5) freeway to the north, to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east, and to the Santa Ana (I-5) freeway to the south.

Local streets serving the Project Area include Wilshire Boulevard, Sunset Place, 6th Street, 8th Street and Olympic Boulevard in the east-west direction and Hoover Street, Vermont Avenue, Rampart Boulevard and Alvarado Street in the north-south direction. Wilshire Boulevard is an east-west street located north of the Project Site. It is a two-way street providing two travel lanes in each direction and is designated as an Avenue I. 6th Street is an east-west street located north of the Project Site. It is a two-way street with two travel lanes in each direction and is designated as an Avenue II. 8th Street is an east-west street located south of the Project Site. It is a two-way street with two travel lanes in each direction and is designated as an Avenue II. Olympic Boulevard is an east-west street located south of the Project Site. It is a two-way street providing two travel lanes in each direction and is designated as a Boulevard II. Sunset Place is an east-west street located to the south of the Project Site. It is a two-way street providing one travel lane in each direction in the vicinity of the Project Site and is designated as a Local Standard. Hoover Street is a north-south street located east of the Project Site. It is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site, which terminates at Wilshire Boulevard and Lafayette Park. Hoover Street is designated as an Avenue II near the Project Site and a Boulevard II near the Santa Monica Freeway. Rampart Boulevard is a northeast-southwest street in the Project Area. It is a two-way street with two or three travel lanes in each direction and is designated as an Avenue II. It provides one lane in each direction south of 6th Street and provides two lanes in each direction north of 6th Street. Rampart Boulevard is designated as an Avenue II. Alvarado Street is a northeast-southwest street in the Project Area. It is a two-way street with two or three travel lanes in each direction and is designated as an Avenue II.

The Project Area is currently served by a total of three local transit agencies by both bus and rail transit service: the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, and Foothill Transit. Located immediately north of the Project Site, Wilshire Boulevard carries one Metro Rapid Line (720) and one Metro Local Bus line (Metro Line 20/21). Four additional Metro Local Bus lines (16/316, 18, 66/366, 603), one LADOT DASH line (Wilshire Center/Koreatown), and one Foothill Transit line (481) provide service in the vicinity of the Project Site.



Source: Bing Maps, 2016



Figure II-1
Project Location Map

Additionally, the Project Site is approximately 0.3 mile east of the Wilshire/Vermont Metro Redline Station, which provides subway and light rail services. The Metro Redline provides service between Downtown Los Angeles and North Hollywood and has stations along Wilshire Boulevard at Alvarado Street, Vermont Avenue, Normandie Avenue, and Western Avenue. Due to its proximity to the Wilshire/Vermont Metro Redline 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

Wilshire Community Plan

The Project Site is currently zoned C4-2 with the land use designation of Regional Center Commercial. Height District No. 2 does not specify a building height limit for a C4 Zone. 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.

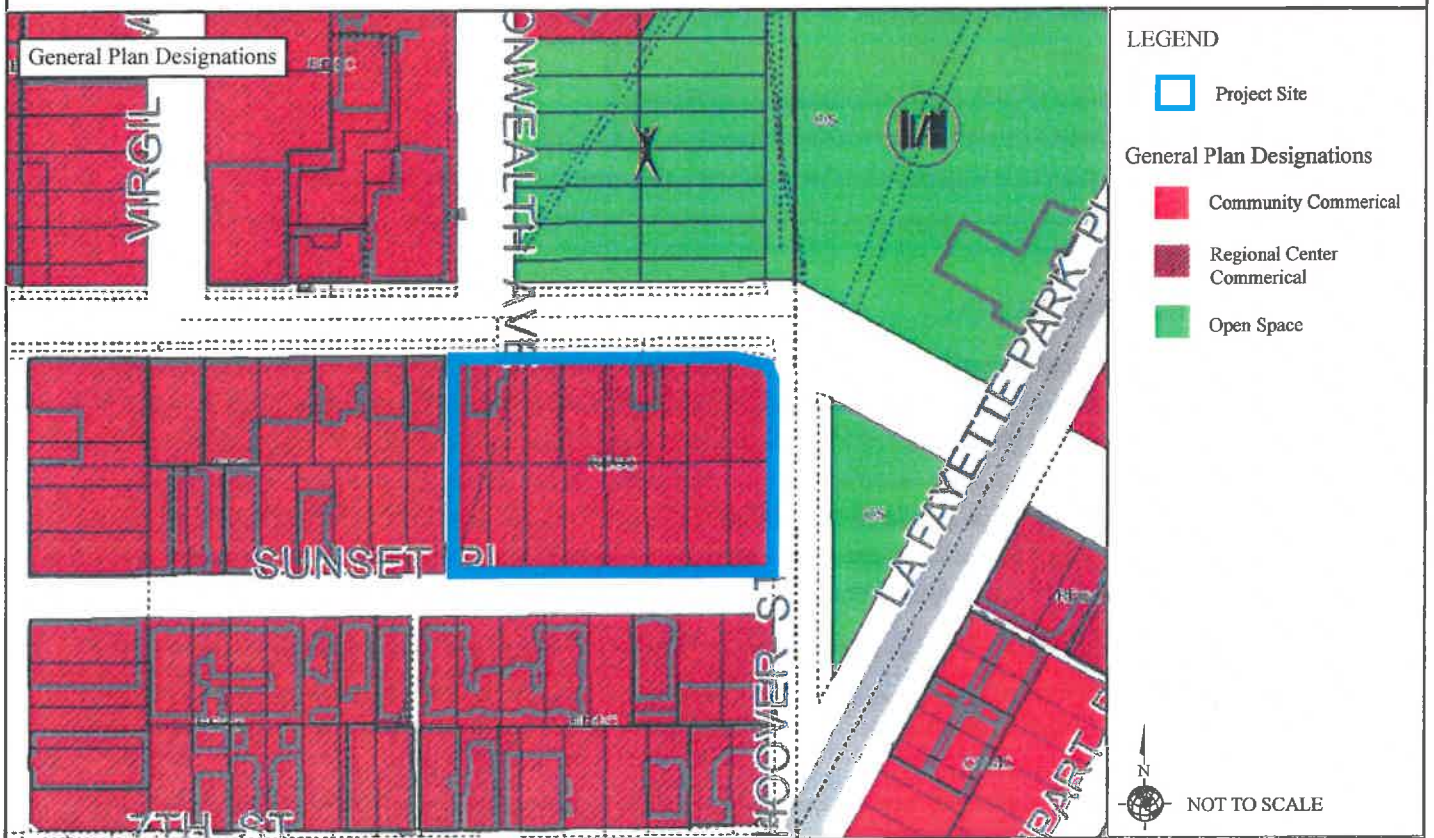
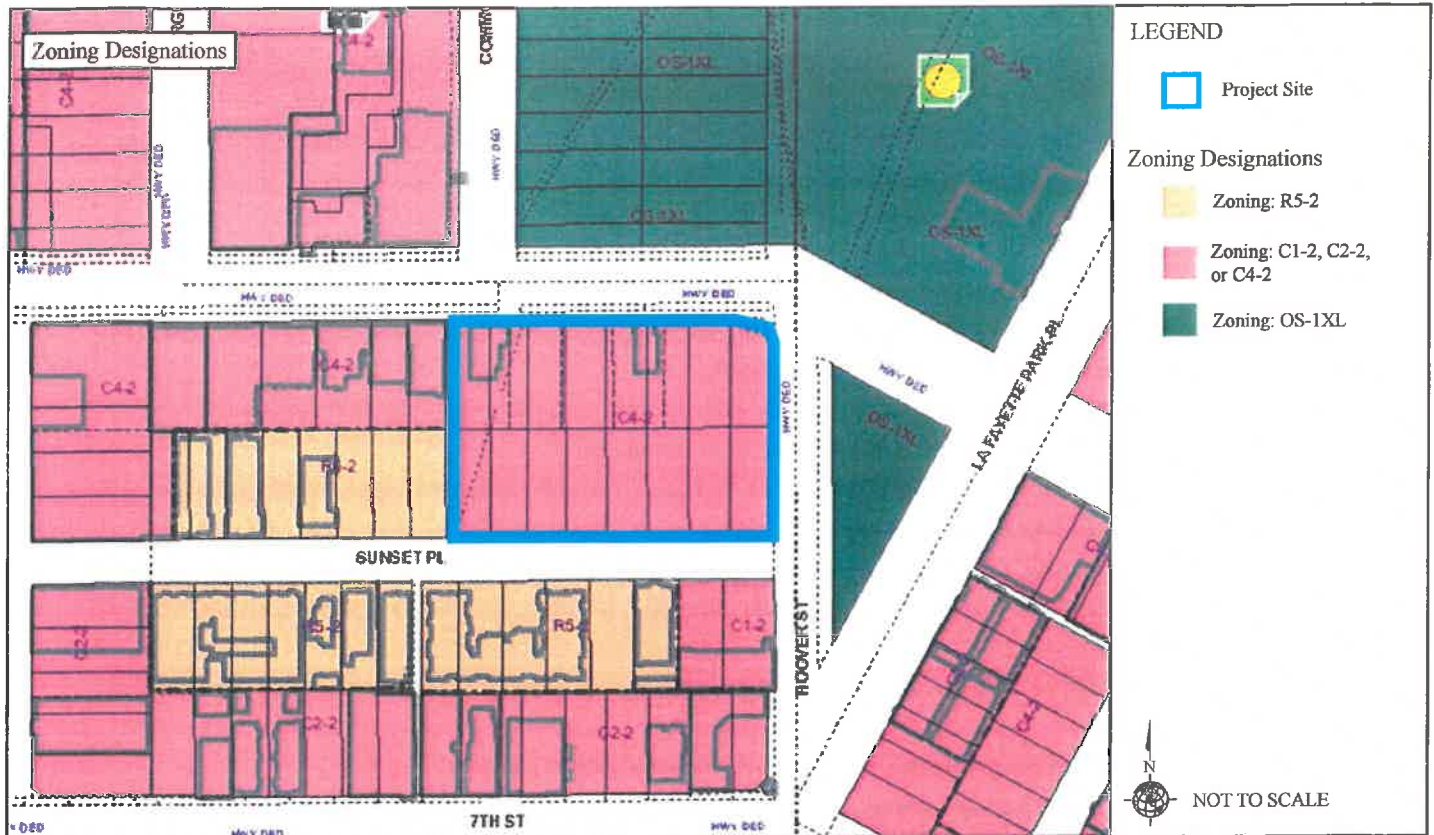
The Project Site is located within the Wilshire Community Plan (“Community Plan”) area of the City of Los Angeles. More specifically, the Project Site is located within the Wilshire Center Regional Commercial Center, which is identified as an area that “includes a dense collection of high rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and both high-rise and low-rise apartment buildings.”¹ The Project Site is also 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 Wilshire Center/Koreatown Redevelopment Project area, the Metro Rail Project Area, the Adaptive Reuse Incentive Area, Wilshire Center Business Improvement District, and Enterprise Zone (the Employment and Economic Incentive Program Area).

Wilshire Center/Koreatown Redevelopment Plan

The Project Site is located within the Wilshire Center/Koreatown Redevelopment Project area. The Wilshire Center/Koreatown Redevelopment Plan, effective December 13, 1995, is valid until December 13, 2025.² As such, the Proposed Project will 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 Wilshire Center/Koreatown Redevelopment Project.

¹ City of Los Angeles Department of City Planning, *Wilshire Community Plan* (pg. III-5).

² City of Los Angeles Community Redevelopment Agency – Los Angeles, *Wilshire Center/Koreatown*, website: http://www.crala.org/internet-site/Projects/Wilshire_Center/workprogram.cfm, accessed September 2015.



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



Figure II-2
Zoning and General Plan Land Use Designations

The purpose of the Redevelopment Plan is to implement the Community Plan's goals for the revitalization of the Wilshire Center/Koreatown neighborhood. The Redevelopment Plan identifies overall objectives including the following:

- Elimination of blight and deterioration in the community;
- Encouragement of involvement and participation by property owners, residents, business persons, and religious and community organizations;
- Promotion of the economic, social, educational, cultural, and physical well-being in the community; promotion of the livability of the community;
- Encouragement of the development of housing in a wide range of types; enhancement of the safety and security in the community;
- Encouragement of employment in the community; promotion of educational and job training opportunities for community residents with the LAUSD, public and private employers and institutions;
- Provide for an efficient circulation system and encouragement of improvement of public transit services;
- Promotion of programs that recognize and support diverse cultures;
- Provide additional open space;
- Enhancement and beautification of the major thoroughfares;
- Promotion and encouragement of artists, crafts people, and entertainers in the community;
- Development of a cultural and entertainment district;
- Preservation of historical buildings and monuments;
- Establishment of sign standards and controls to avoid clutter;
- Coordination of revitalization efforts and take advantage of other programs; and
- Promotion and encouragement of the development of bicycle-friendly streets and a full range of amenities.³

EXISTING CONDITIONS

Figure II-3, Aerial Photograph of the Project Site, shows an aerial view of the Project Site, which includes a surface parking lot, two one-story commercial buildings (a total existing building area of approximately 4,488 square feet), and identifies the location points for the site photographs shown in Figure II-4, Photographs of the Project Site, and Figure II-5, Photographs of Surrounding Land Uses. Additionally, as shown in Views 2 and 5 in Figure II-4, a billboard is located on the north side of the Project Site. The perimeter of the Project Site is secured with a metal fence and sliding gates across the driveways to limit access on-site during non-operational hours.

The Project Site is entirely devoid of any significant vegetation. There are 31 existing trees located on the Project Site, including evergreen pears (*Pyrus kawakamii*), Mexican fan palms (*Washingtonia robusta*) and date palms (*Phoenix dactylifera*). The public right-of-way contains 22 street trees adjacent to the

³ City of Los Angeles Community Redevelopment Agency, *Redevelopment Plan for the Wilshire Center/Koreatown Recovery Redevelopment Project*, 1995.

Project Site, including 12 evergreen pears, 3 Mexican fan palms, 1 date palm, 4 Bottlebrush trees (*Callistemon viminalis*), and 2 Queen palms (*Syagrus Romanzoffiana*), which are not considered protected trees. The development of the Proposed Project would require the removal of all non-protected tree species within the Project Site and the 22 street trees within the public right-of-way. Removal of the 22 trees in the public right-of-way would be conducted in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Board of Public Works.

SURROUNDING LAND USES

The surrounding properties are developed with a public park, court building, and mixed-use commercial, office, and multiple-family residential uses. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses.

To the west of the Project Site, across an alley, are one to three-story commercial and multiple-family residential land uses (See Figure II-5, Views 7 and 8). Properties to the west are zoned C4-2 (Commercial Zone) and R5-2 (Multiple Dwelling Zone). The General Plan land use designation is Regional Center Commercial. To the east of the Project Site, across S. Hoover Street, is an extension of Lafayette Park (See Figure II-5, Views 9 and 10). The property to the east is zoned OS-1XL (Open Space Zone). The General Plan land use designation is Open Space. To the north, across Wilshire Boulevard, are Lafayette Park, Central Civil West Courthouse (approximately 38-stories), and The Town House, a 12-story vacant hotel (See Figure II-5, View 11). Properties to the north are zoned OS-1XL (Open Space Zone) and C4-2 (Commercial Zone). The General Plan land use designations are Open Space and Regional Center Commercial. To the south of the Project Site, across Sunset Place, are two to four-story commercial and multiple-family residential land uses (See Figure II-5, View 12). Properties to the south are zoned C1-2 (Commercial Zone) and R5-2 (Multiple Dwelling Zone). The General Plan land use is Regional Center Commercial.

TRANSIT PRIORITY AREA

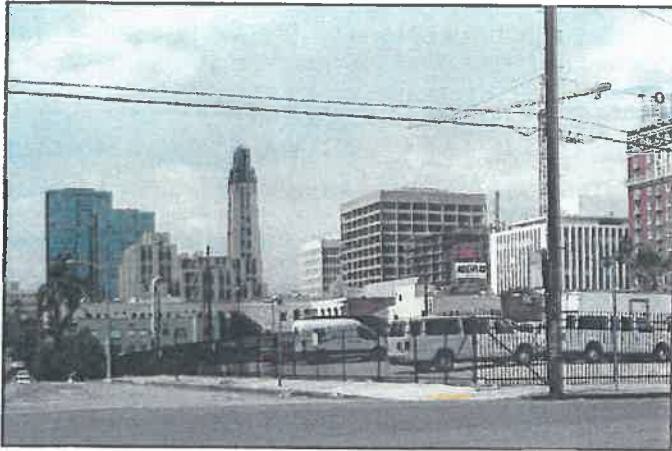
In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” 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.



Source: Google Earth, Aerial View, 2016



Figure II-3
Aerial Photograph of the Project Site



View 1: From the east side of Hoover Street looking northwest at the Project Site.



View 2: From the west side of Hoover Street looking northwest at the Project Site.



View 3: From the south side of Sunset Place looking north at the Project Site.



View 4: From the north side of Wilshire Boulevard looking southeast at the Project Site.



View 5: From the north side of Wilshire Boulevard looking southwest at the Project Site.



View 6: From the north side of Wilshire Boulevard looking southwest at the Project Site.

Source: Parker Environmental Consultants, 2016



Figure II-4
Photographs of the Project Site



View 7: From the south side of Hoover Street looking west.



View 8: From the north side of Wilshire Boulevard looking southwest.



View 9: From the south side of northwest corner of Hoover Street and Sunset Place looking east.



View 10: From the southeast intersection of Wilshire Boulevard and Hoover Street looking north.



View 11: From the south side of Wilshire Boulevard looking north.



View 12: From the east side of Hoover Street looking west.

Source: Parker Environmental Consultants, 2016

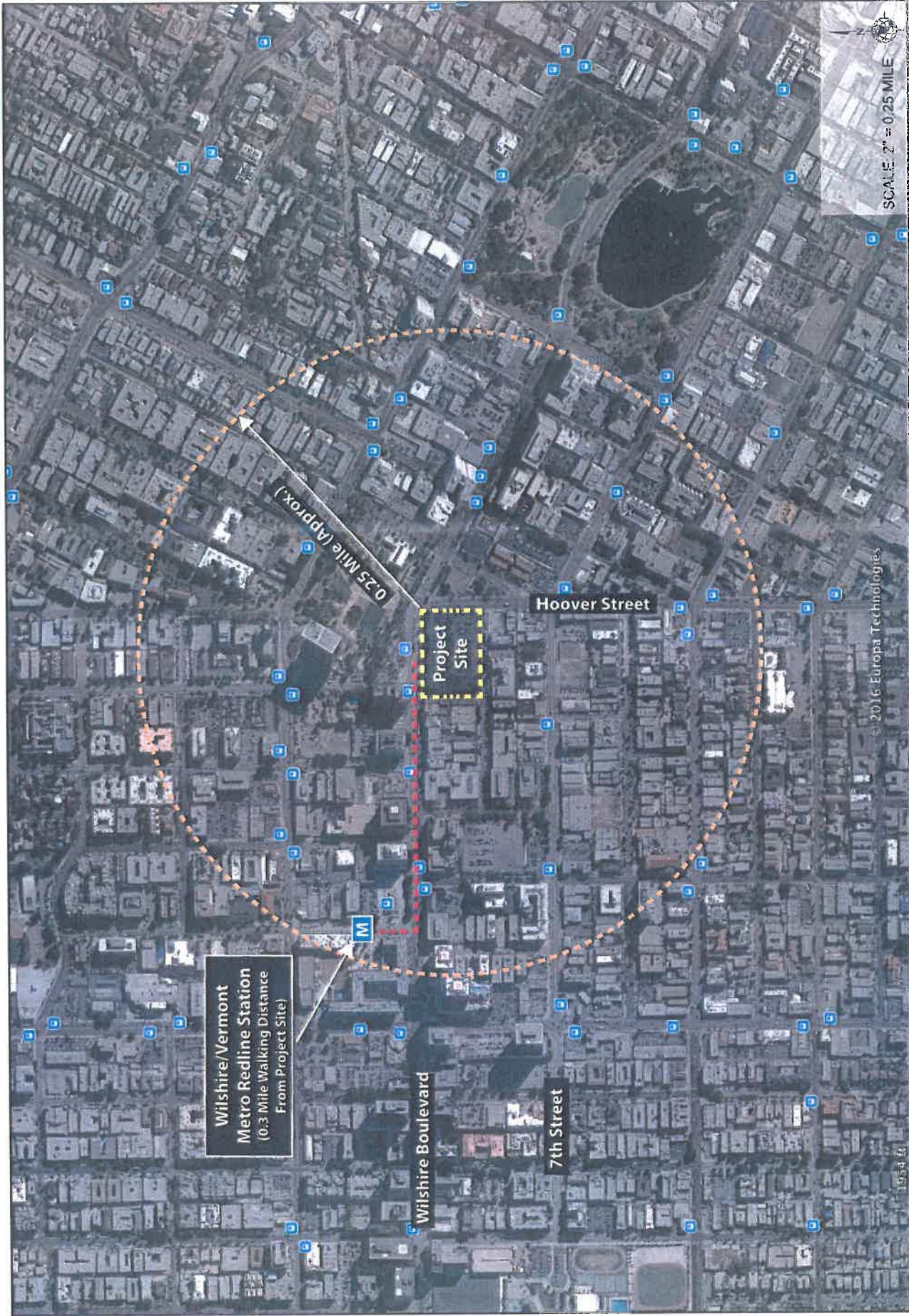


Figure II-5
Photographs of Surrounding Land Uses

The Project Site is an infill site within a Transit Priority Area as defined by CEQA.⁴ As shown in Figure II-6, Project Vicinity – Proximity to Transit Services, the Project Site is approximately 0.3 mile east of the Wilshire/Vermont Metro Redline Station, which provides subway and light rail services. The Metro Redline provides service between Downtown Los Angeles and North Hollywood and has stations along Wilshire Boulevard at Alvarado Street, Vermont Avenue, Normandie Avenue, and Western Avenue. Due to its proximity to the Wilshire/Vermont Metro Redline Station, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area. Public bus and rail transit services with the Project Site are currently provided by a total of three local transit agencies by both bus and rail transit service: the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, and Foothill Transit. Located immediately north of the Project Site, Wilshire Boulevard carries one Metro Rapid Line (720) and one Metro Local Bus line (Metro Line 20/21). Four additional Metro Local Bus lines (16/316, 18, 66/366, 603), one LADOT DASH line (Wilshire Center/Koreatown), and one Foothill Transit line (481) provide service in the vicinity of the Project Site.

Due to its proximity to the Wilshire/Vermont Metro Redline Station and public bus and rail transit services, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

⁴ *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 24, 2016.*



Source: Google Earth, 2016



Figure II-6
Project Vicinity - Proximity to Transit Services

II. PROJECT DESCRIPTION

B. PROJECT CHARACTERISTICS

PROPOSED DEVELOPMENT

The Proposed Project would include the demolition of the existing surface parking lot and two one-story commercial buildings totaling 4,488 square feet of existing building area, and the existing billboard on the Project Site. The Proposed Project involves the construction of a 23-story mixed-use building, which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, 5,500 square feet of restaurant space, a 7-story podium, and 6 above grade parking levels. As shown in Table II-2, Proposed Development Program, below, the Proposed Project would include 644 residential units totaling approximately 642,014 square feet of residential floor area. Residential units would include a mix of 227 studio units, 165 1-bedroom units, 128 1-bedroom/den units, 106 2-bedroom units, and 18 2-bedroom/den units. The commercial uses would include 10,000 square feet of ground floor neighborhood-serving retail and 5,500 square feet of restaurant space, which will be located on the ground floor fronting Wilshire Boulevard. The plot plan of the Proposed Project is depicted in Figure II-7, Plot Plan. Ground Floor, Level 2, Level 3, Level 4, Level 5, Level 6, Level 7, Mid-Level Tower, Level 22, Level 23, Penthouse Level, and the Roof Plan for the Proposed Project are depicted in Figures II-8 through II-19, respectively.

**Table II-2
Proposed Development Program**

Land Uses	Proposed Dwelling Units Mix	Proposed Floor Area
Proposed Project:		
Residential		
Studio Units	227	642,014 sf
1-Bedroom Units	165	
1-Bedroom/Den Units	128	
2-Bedroom Units	106	
2-Bedroom/Den Units	18	
Total Residential	644	
Commercial		
Ground Floor Neighborhood-Serving Retail	--	10,000 sf
Restaurant	--	5,500 sf
TOTAL DEVELOPMENT		657,514 sf
<i>Source: LARGE architecture, October 31, 2016.</i>		

FLOOR AREA

The Project Site occupies 128,994 square feet (2.96 acres) of buildable lot area. The Wilshire Community Plan and zoning for the Project Site permits the total floor area of the site up to a ratio of 6:1 or approximately 773,964 square feet based on buildable lot area. Pursuant to the LAMC Section 14.5.3, the floor area of a building is divided by the lot area of the lot (prior to any dedications) upon which it is located. As shown in Table II-1, above, the Project proposes 657,514 square feet of floor area for an approximate 5.1:1 FAR.

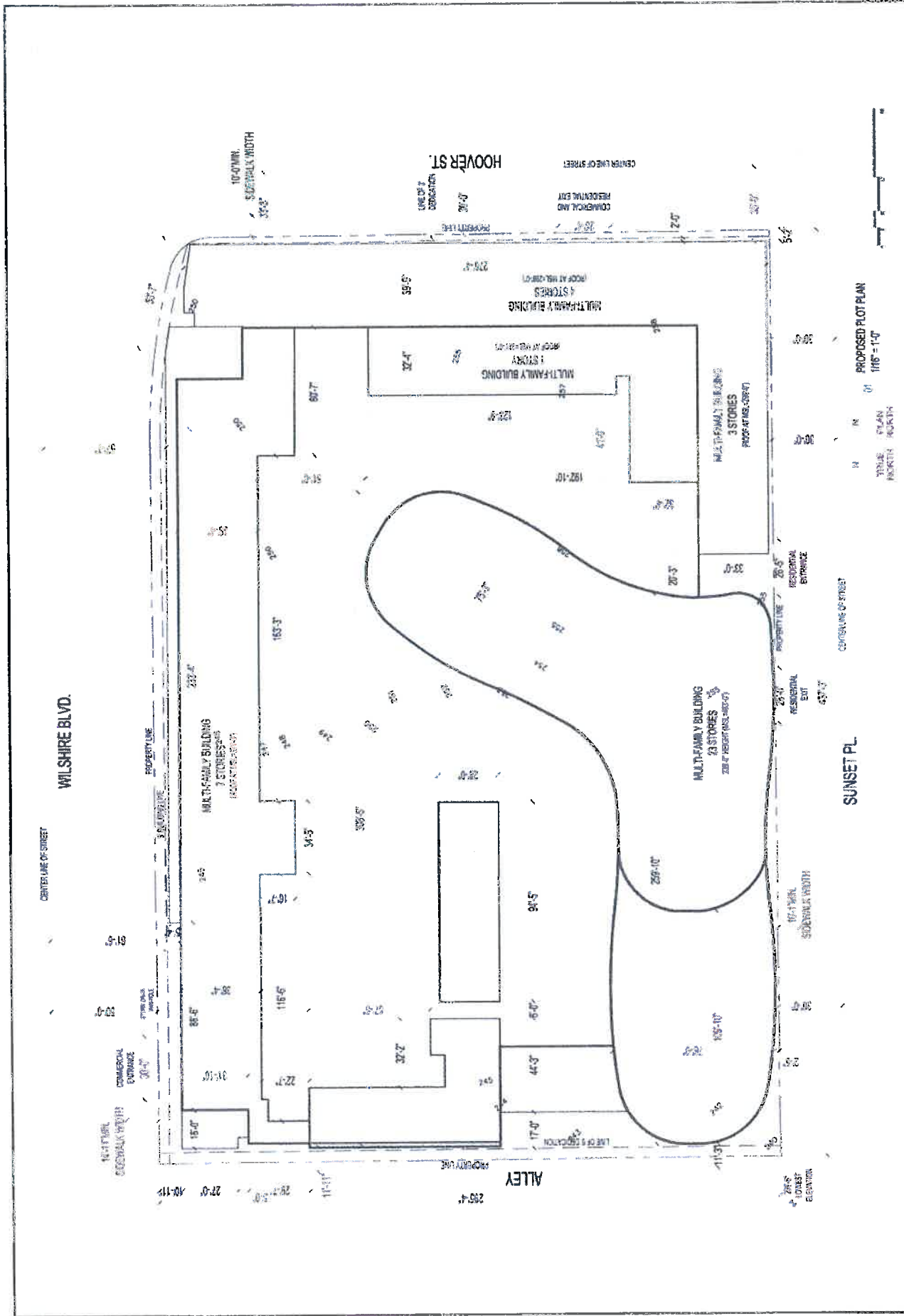
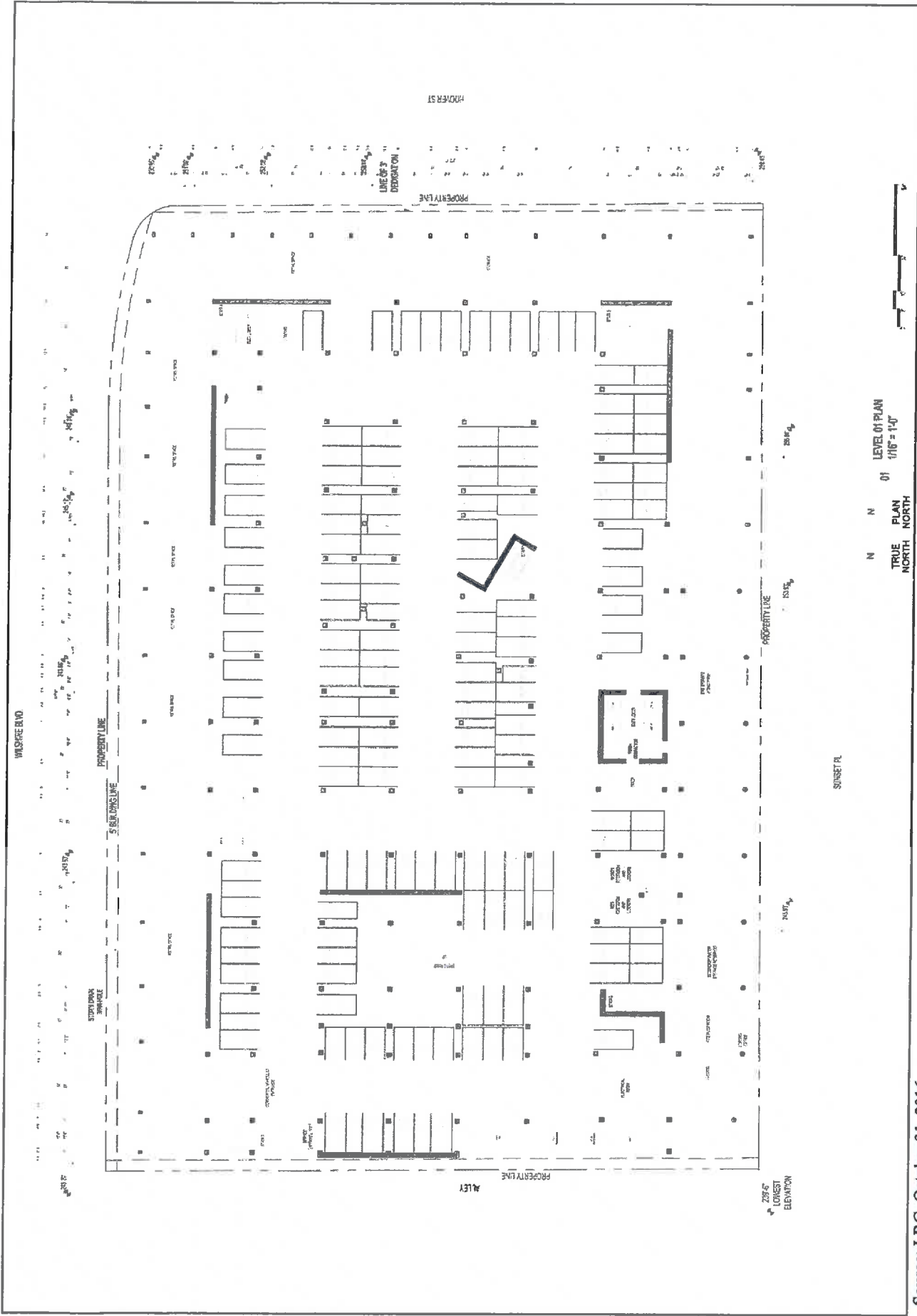


Figure II-7
Plot Plan

Source: LRG, October 31, 2016

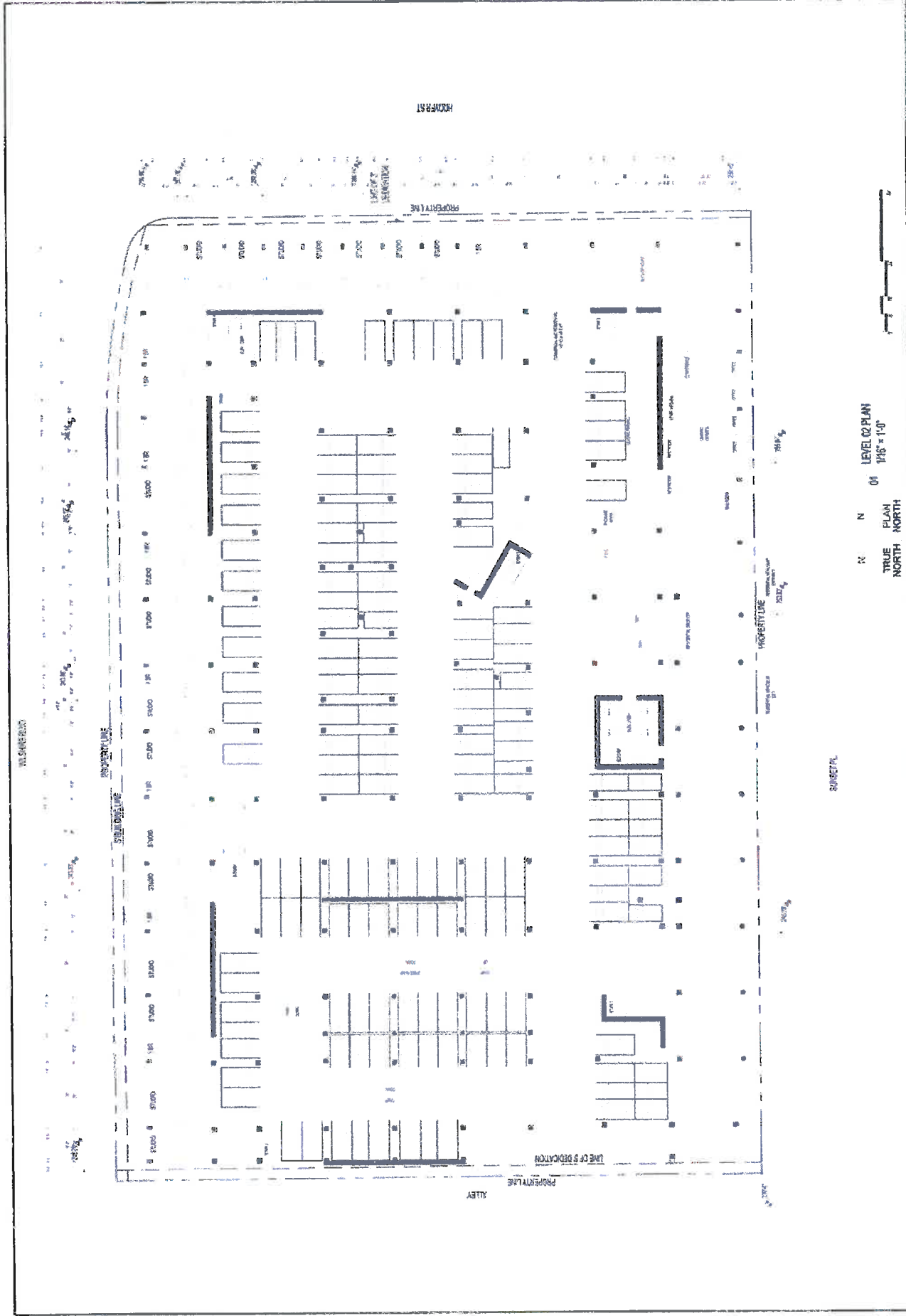




Source: LRG, October 31, 2016



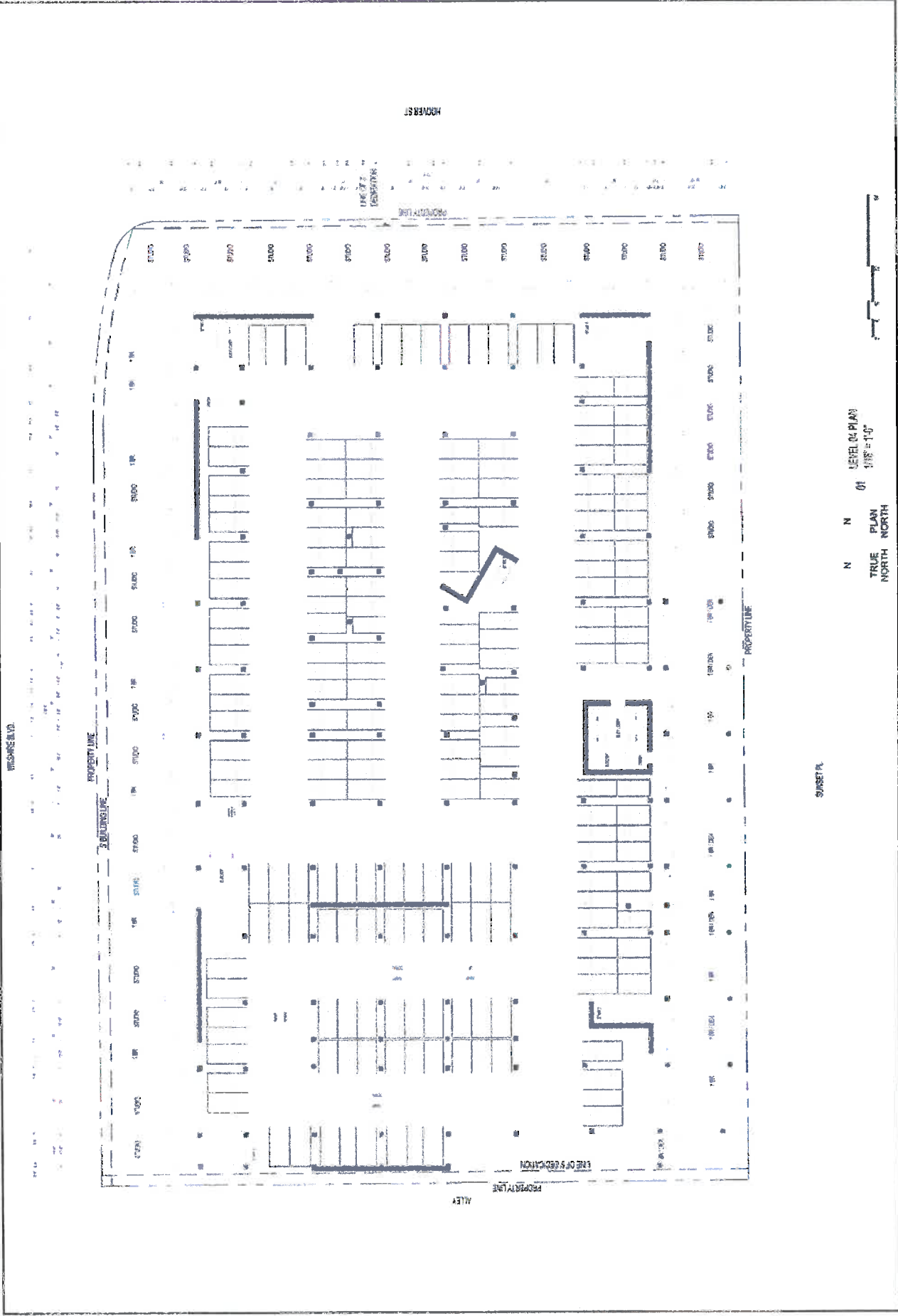
Figure II-8
Ground Floor Plan



Source: LRG, October 31, 2016



Figure II-9
Level 2 Plan



Source: LRG, October 31, 2016



Figure II-11
Level 4 Plan

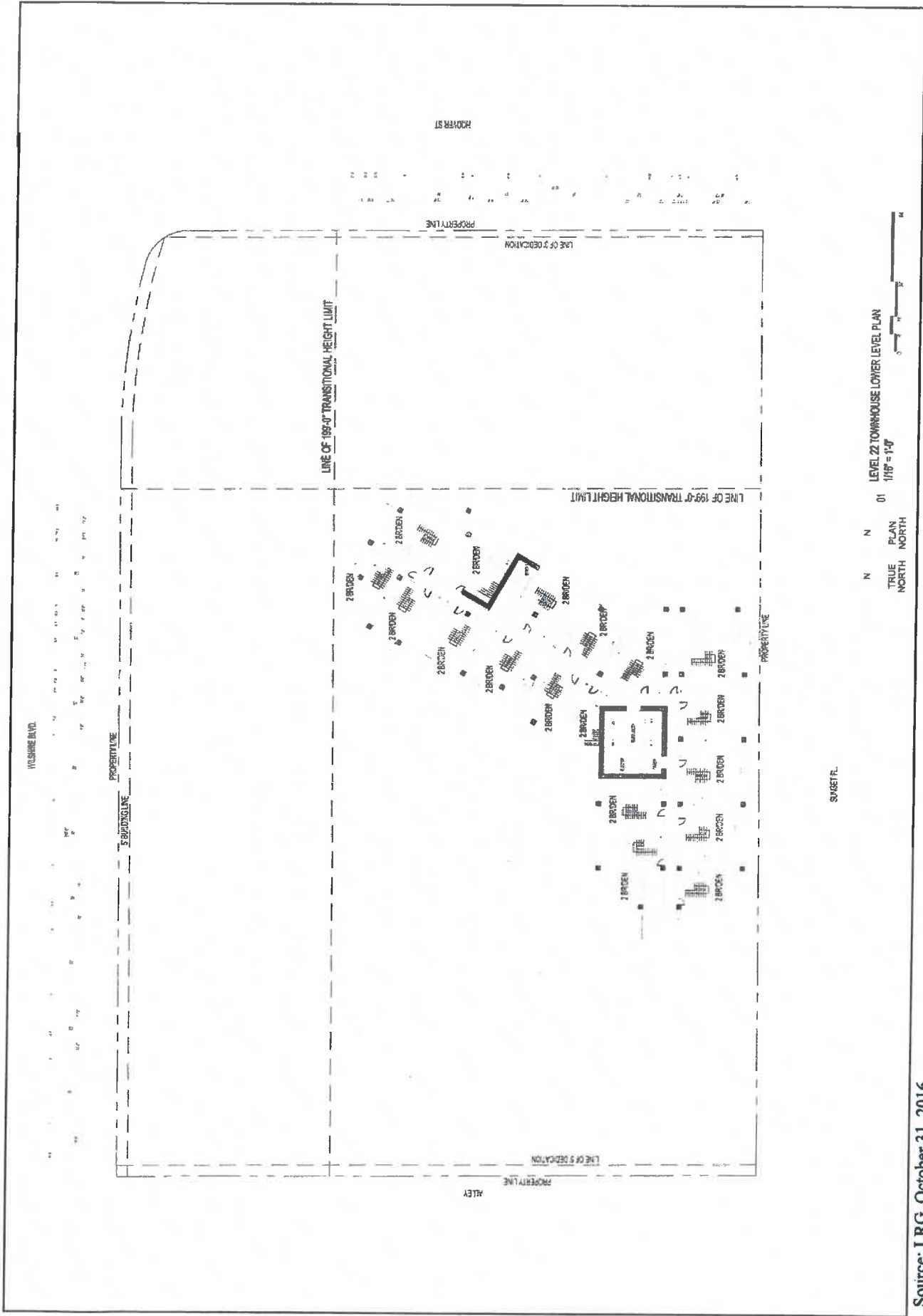


Source: LRG, October 31, 2016



Figure II-15
Mid-Level Tower Plan

N N N
TRUE PLAN
NORTH NORTH
01
TYPICAL MID-LEVELS 18-21 TOWER PLAN
1/8" = 1'-0"



Source: LRG, October 31, 2016



Figure II-16
Level 22 Plan



Source: I.R.G., October 31, 2016



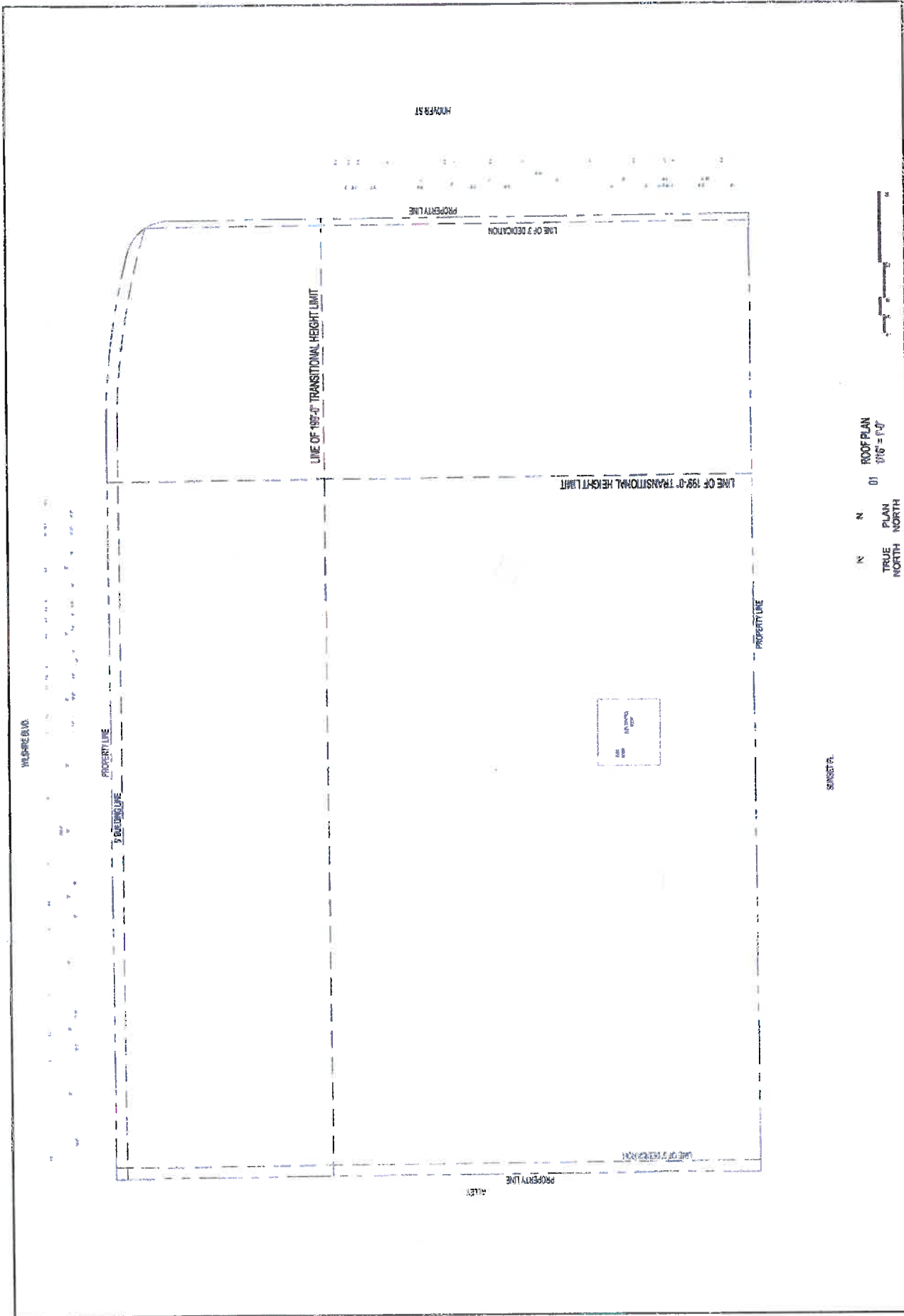
Figure II-17
Level 23 Plan

SHEET PL

N
TRUE
NORTH

PL
PLAN
NORTH

LEVEL 23 TOWNHOUSE UPPER LEVEL PLAN
1/8" = 1'-0"



Source: LRG, October 31, 2016



Figure II-19
Roof Plan

RESIDENTIAL DENSITY & UNIT COUNT

Per LAMC Section 12.22 A 18, the lot area requirements of the R5 Zone applies to all portions of buildings erected and used for residential purposes in the C4 Zone with a Regional Center Commercial land use designation. Per LAMC Section 12.12 C 4, under the R5 Zone, every lot shall have a minimum width of 50 feet and a maximum area of 5,000 square feet and the minimum lot area per dwelling unit shall be 200 square feet. The Project Site will be developed with up to 644 residential units (227 studio units, 165 1-bedroom units, 128 1-bedroom/den units, 106 2-bedroom units, and 18 2-bedroom/den units) and no guest rooms totaling approximately 642,014 square feet of residential floor area. Thus, the Proposed Project is consistent with this requirement.

BUILDING HEIGHT

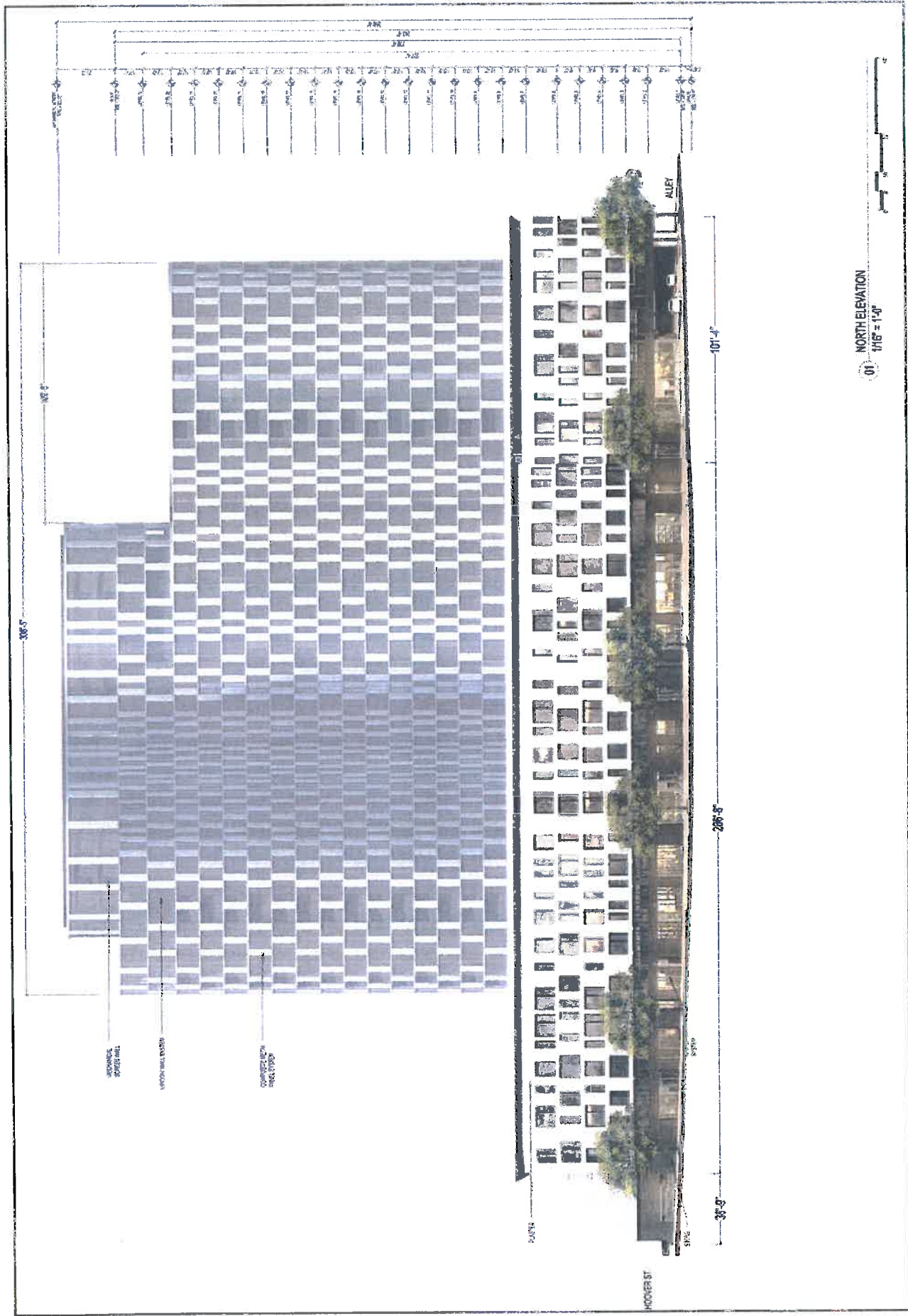
As stated above, the Project Site is zoned C4-2 with a land use designation of Regional Center Commercial. Height District No. 2 does not specify a building height limit for a C4 Zone. However, as the Project Site is located adjacent to an OS Zone (the property to the east and north of the Project Site are zoned OS-1XL), the Proposed Project would be expected to comply with LAMC Section 12.21.1A.10, which limits the portions of building heights on a C zoned lot when located within the following distances from a lot classified in the RW1 Zone or a more restrictive zone, including the OS Zone:

<u>Distance</u>	<u>Height</u>
0 to 49 feet	25 feet
50 to 99 feet	33 feet
100 to 199 feet	61 feet

The Proposed Project includes the development of a mixed-use residential and commercial building with four distinguishing breaks in height and step-backs. Thus, the proposed 23-story mixed-use building will have a maximum height of approximately 268.5 feet above grade with a break in height at approximately 215 feet above grade (Level 21). The proposed mixed-use building would also include an approximately 64 foot Level 7 podium (Amenity Podium) and an approximately 53 foot 6-story parking garage. The proposed mixed-use building would also have an approximately 81 foot transitional height limit. Therefore, the Proposed Project is consistent with the LAMC building height requirements. Elevations depicting the scale and massing of the proposed structure are depicted in Figure II-20 through Figure II-23. A building section of the Proposed Project is depicted in Figure II-24.

ARCHITECTURAL FEATURES

The Proposed Project consists of a 23-story building with 22 floors of dwelling units and a 7-story podium with ground-floor commercial space and a 6-story parking garage. As discussed above, the proposed 23-story mixed-use building will have a maximum height of approximately 268.5 feet above grade with a break in height at approximately 215 feet above grade (Level 21). Of the 644 total dwelling units, 437 dwelling units would be located in the 23-story hi-rise tower and 207 dwelling units would be located in 7 stories that front Wilshire Boulevard and 4 stories that front Hoover Street and Sunset Place. The 207 dwelling units would wrap around the 7-story podium and the 6 above grade parking levels. The above-grade parking for the building will be indoors and concealed with architectural elements. Architectural materials and elements include glass, glass fiber reinforced concrete, handrail, grill work, and glazing. The design and configuration of the Proposed Project, as currently proposed, would be memorialized. Renderings of the Proposed Project are depicted in Figures II-25 through II-27.



Source: LRG, October 31, 2016



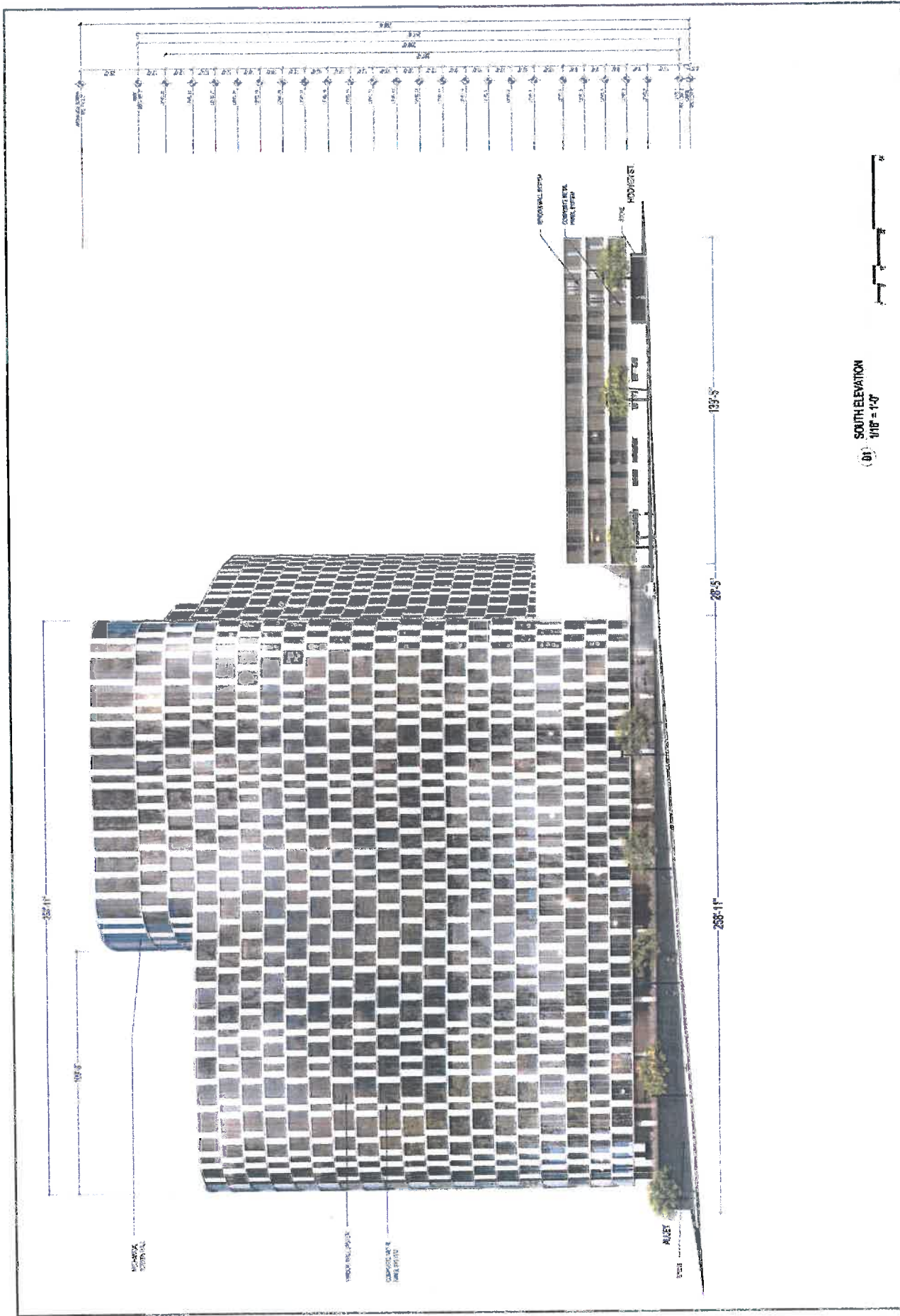
Figure II-20
North Elevation



Source: LRG, October 31, 2016



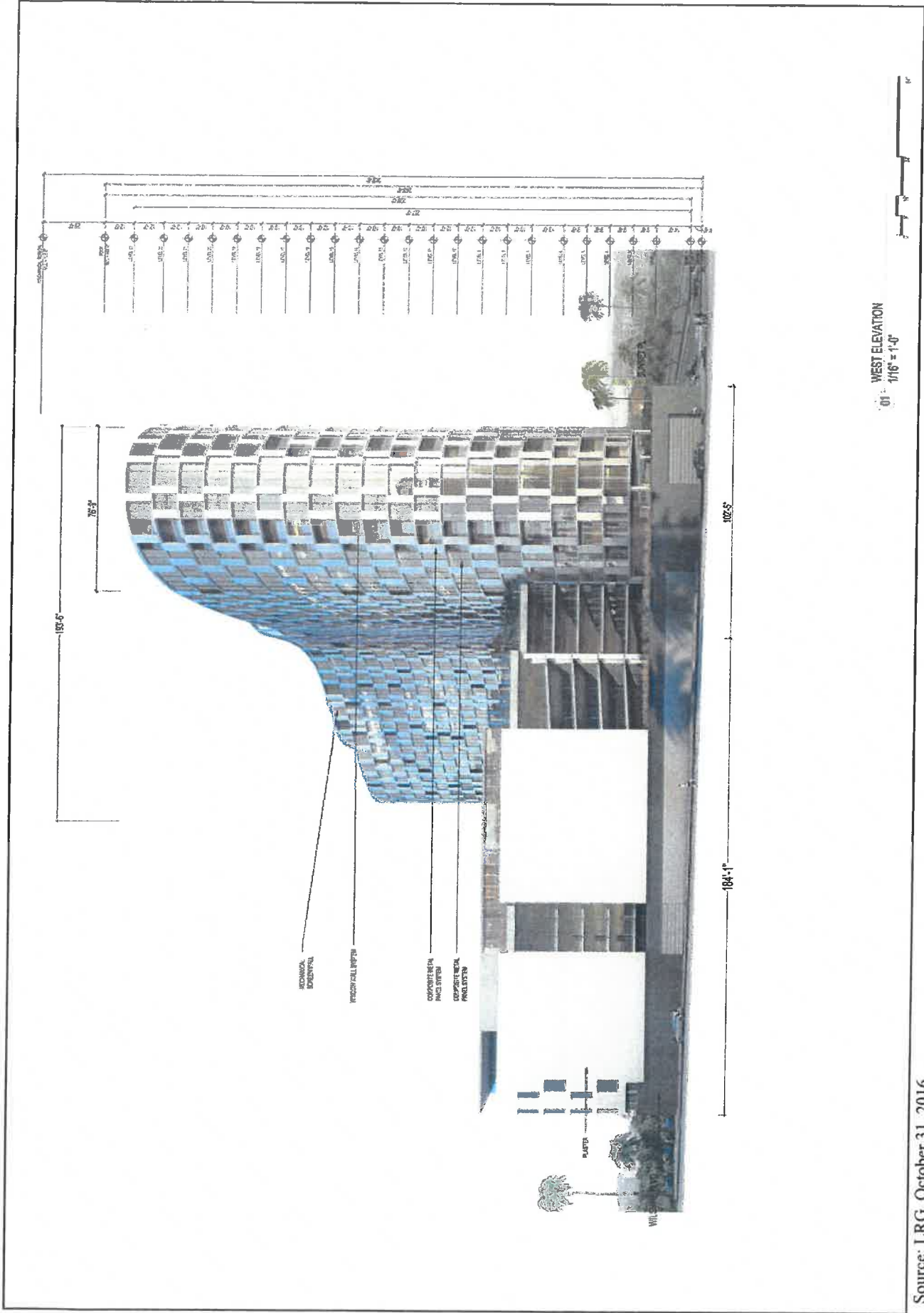
Figure II-21
East Elevation



Source: IRG, October 31, 2016



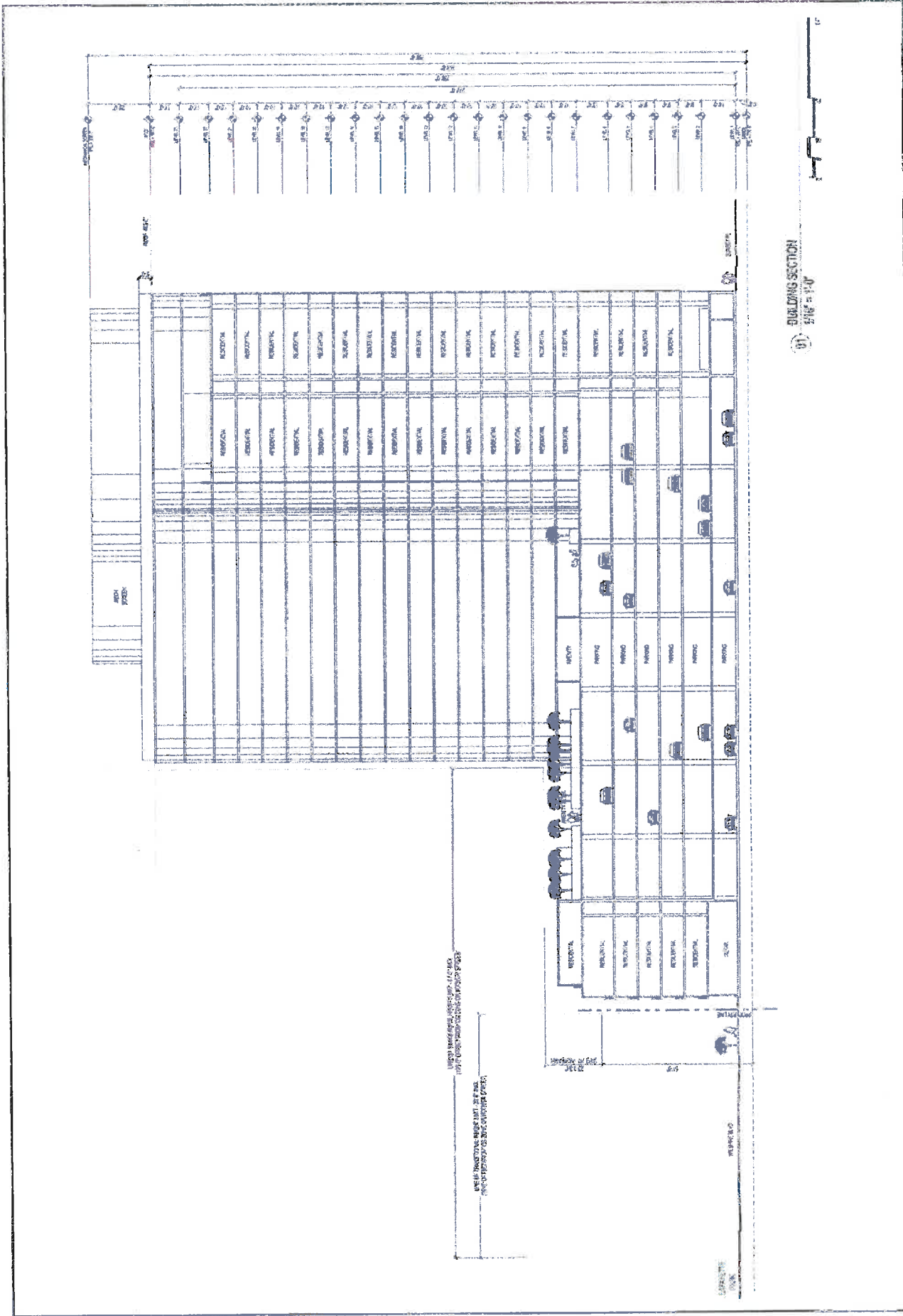
Figure II-22
South Elevation



Source: LRG, October 31, 2016



Figure II-23
West Elevation



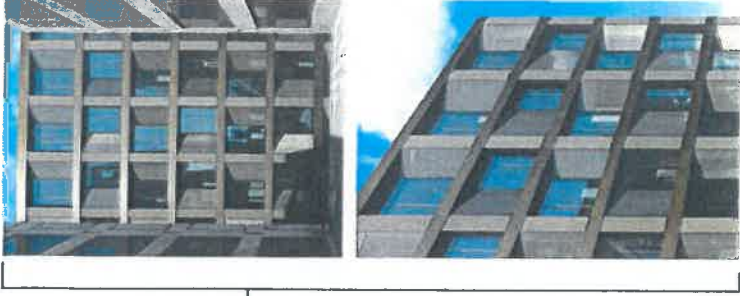
Source: LRG, October 31, 2016



Figure II-24
Building Section



WILSHIRE BLVD. PERSPECTIVE (AERIAL VIEW)



TOWER
(EXTERIOR FACADE SUGGESTIVE IMAGES)



LOW-RISE BUILDING
(EXTERIOR FACADE SUGGESTIVE IMAGES)

Source: LRG, October 31, 2016



Figure II-25
Wilshire Boulevard Perspective (Aerial View)



HOOPER ST. - WILSHIRE BLVD. PERSPECTIVE (AERIAL VIEW)



ROOF GARDEN
(SUGGESTIVE IMAGE)



LOWRISE BUILDING
(EXTERIOR FACADE SUGGESTIVE IMAGES)



Source: LRG, October 31, 2016



Figure II-26
Hoover Street – Wilshire Boulevard Perspective (Aerial View)



SUNSET PL. PERSPECTIVE (AERIAL VIEW)



ROOF GARDEN
(SUGGESTIVE IMAGE)



LOW-RISE BUILDING
(EXTERIOR FACADE SUGGESTIVE IMAGES)



Source: LRG, October 31, 2016



Figure II-27
Sunset Place Perspective (Aerial View)

OPEN SPACE AND LANDSCAPING

Amenities proposed within the residential common open space areas include indoor and outdoor communal areas on Level 7 (Amenity Podium). The open space requirements and amount of open space proposed for the Project are summarized in Table II-3, Summary of Required and Proposed Open Space Areas. The Project would include a total of 64,440 square feet of common and private open space areas incorporated throughout the Project Site. These common and private open space areas include, but are not limited to, an outdoor fire pit / gathering area, private outdoor patio areas for residential units, outdoor game area, indoor party room, dog park area, barbeque area, spa and downtown viewing deck, cabanas, indoor yoga and fitness area, and pool located on Level 7 (Amenity Podium). Pursuant to LAMC Section 12.21.G.3, the Applicant is requesting a 10% reduction in total open space. The Proposed Project's open space will be attractively landscaped as shown in Figures II-28 and II-29. Street trees are currently located adjacent to the property along Wilshire Boulevard, S. Hoover Street, and Sunset Place. Removal of the 22 trees in the public right-of-way as a result of the Proposed Project would be conducted in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Board of Public Works. The Project will also provide one tree per four units for a total of 161 trees on-site and 9,000 square feet of planted open space.

**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) (Studio and 1-bedroom units)	392	39,200
3 Habitable Rooms (125 sf/du)	234	29,250
More than 3 Habitable Rooms (175 sf/du)	18	3,150
<i>Subtotal Required Open Space</i>	<i>644</i>	<i>71,600</i>
<i>10% Reduction Allowed per ^a</i>	<i>--</i>	<i>-7,160</i>
Total Open Space Required/Proposed	--	64,440
<i>Notes: du = dwelling unit; sq = square feet</i>		
<i>^a LAMC Section 12.21.G.3</i>		
<i>Source: LARGE architecture, October 31, 2016.</i>		

SETBACKS

Pursuant to LAMC Section 12.22.A18(c), no yard requirements apply for residential portions of building located in the C4 Zone used for combined commercial and residential uses, if such portions are used exclusively for residential uses, abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. The proposed development provides no setbacks and complies with these requirements.

PARKING AND ACCESS

Pedestrian egress and ingress to the Proposed Project's residential component would be provided via the lobby entrance located on Sunset Place. Pedestrian access to the commercial component would be from the Wilshire Boulevard and Hoover Street frontages. Parking for the retail and residential uses on-site will be provided above grade on Level 1 through Level 6, a total of six parking levels. Vehicular access to the Project Site will be provided via the following four driveways:

- A full-access-inbound only driveway at Commonwealth Avenue & Wilshire Boulevard;
- An outbound only right-turn-out driveway from Hoover Street on the east side of the Project Site;
and
- Two full-access driveways for residents only from Sunset Place on the south side of the Project Site.

The loading entrance for truck deliveries would also be located on Sunset Place.

As summarized in Table II-4, and discussed in further detail below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC. As proposed, the Proposed Project would require a total of 1,010 parking spaces, which includes: 979 residential spaces and 31 commercial spaces. The Project would provide a total of 1,124 parking spaces, which includes: 1,093 residential spaces and 31 commercial spaces. The Proposed Project would provide more parking than is required pursuant to the LAMC.

The Proposed Project provides on-site bicycle parking in bicycle storage spaces. 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. The Proposed Project would be required to provide 724 bicycle parking spaces, which includes 72 short term spaces and 652 long term spaces.

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

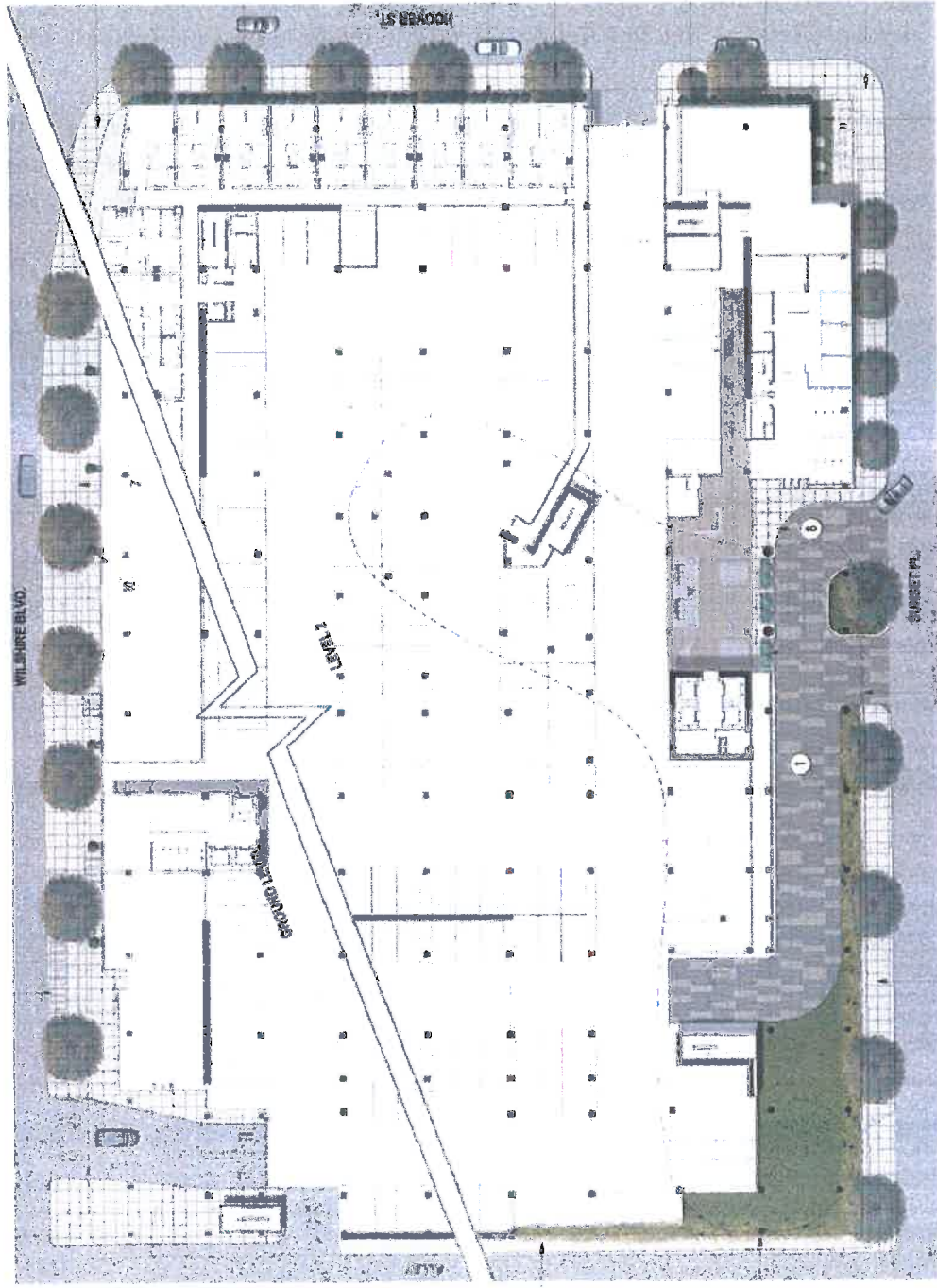
Description	Quantity	Parking Required		Parking Provided
		Rate	Spaces	
Residential				
Units with 3 or less Habitable Rooms	227	1.0/du	227	--
Units with 3 Habitable Rooms	165	1.5/du	248	--
Units with more than 3 Habitable Rooms	252	2.0/du	504	--
Required Residential Parking			979	1,093
Commercial				
Commercial	15,500 sf	2/1,000 sf	31	--
Required Commercial Parking			31	31
TOTAL PARKING REQUIRED			1,010	1,124
<i>Notes:</i> du = dwelling unit, sf = square feet Source: LARGE architecture, October 31, 2016.				

**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					
Dwelling Units	644 du	(1 per 10 DUs)	(1 per DU)	708	708
Commercial					
Retail/Restaurant	15,500 sf	(1 per 2,000 sf)	(1 per 2,000 sf)	16	16
TOTAL		72	652	724	724
<i>Notes:</i> du = dwelling unit, sf = square feet ^a LAMC 12.21 A.16. Bicycle Parking and Shower Facilities. Source: LARGE architecture, October 31, 2016.					

LEGEND

- 1 ENTRANCE LOBBY
- 2 DECORATIVE PAVING
- 3 STREET TREE
- 4 W/TREE GRATE
- 5 SMALL SITE TREE
- 6 ARTICULATED CANOPY (MARIANA STRANSEBERRY TREE)
- 7 SHRUB / GROUND COVER PLANTING (SIZ)
- 8 RAISED PLANTER, TYP
- 9 GENERAL GREENWALLS (ART TERRACES)
- 10 SYSTEM WALLS
- 11 ENHANCED PEDESTRIAN SUBWAY
- 12 VEHICLE BOLLARD
- 13 SHORT TERM BIKE PARKING (PER ARCH)
- 14 MOVABLE FIBERGLASS PLANTERS
- 15 BUILDING OVERHANG



TREE COUNT (ON SITE)
(MIN. 24" BOX SIZE)

LEVEL 1	0
SMALL SITE TREE	5
ARTICULATED CANOPY (MARIANA STRANSEBERRY TREE)	3
TOTAL	8

Source: LRG, October 31, 2016



Figure II-28
Ground Floor & Level 2 Landscape Plan

CONSTRUCTION

Construction Schedule/Phasing

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 32 months, with full operation occurring in 2020. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition/site clearing, (2) excavation and grading, (3) building construction, and (4) architectural coating/finishing. It is anticipated that the construction activities would involve the export of up to 76,441 cy of soil.

Construction activities would necessitate temporary closures to the sidewalk and parking lane are anticipated for the project along Sunset Place and Hoover Street for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. The sidewalks along Sunset Place and Hoover Street will be closed for the duration of the project. Lane closures are not anticipated along Wilshire Boulevard. The sidewalk on the south side of Sunset Place and east side of Hoover Street will be open and pedestrians are anticipated to use this as a detour throughout construction. 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. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, will be properly permitted by the City agencies and will conform to City standards.

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 Department of City Planning further restricts the hours of construction in residential zones to 6:00 p.m. on weekdays. 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, 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 27 miles north of the Project Site (approx. 54 miles round trip). The Chiquita Canyon landfill is approximately 40 miles to the north of the Project Site (approx. 80 miles round trip). For recycling efforts, Waste Management Downtown Diversion accepts construction waste for recycling and is located approximately 5.4 miles from the Project Site (approx. 10.8 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 haul route for the project would be southbound on Hoover Street to the eastbound I-10 Freeway, to the northbound I-110 Freeway, to the northbound SR-170 Freeway, to the northbound I-5 Freeway to the Sunshine Canyon Landfill. Approval of a modified haul route would be requested prior to construction. The haul route specified above may be modified in compliance with 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 Project, were identified for evaluation.

The related projects identified are included in Table II-6, Related Projects List, below. A total of 91 related projects were identified within the affected Project area. An analysis of the cumulative impacts associated with these related projects and the 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-30, Related Projects Location Map.

**Table II-6
Related Projects List**

Project Number	Project Name	Location/Address	Project Description	Number	Units
1	Mixed-Use Project	1130 W. Wilshire Boulevard	Office	88,224	sf
			Day Care	20	students
			Restaurant (high-turnover and quality)	5,623	sf
2	Mixed-Use Project	2901 E. Olympic Boulevard	Apartments	4,400	du
			Retail	185,000	sf
			Office	125,000	sf
			Medical Office	25,000	sf
			Day Care	15,000	sf
			Library	15,000	sf
3	Mixed-Use Project	1340 S. Figueroa Street	Apartments	252	du
			Restaurant	11,000	sf
4	Mixed-Use Project	848 S. Grand Avenue	Condominiums	420	du
			Supermarket	38,500	sf
5		1430 W. Beverly Boulevard	Apartments	157	sf
6	Mixed-Use Project	1050 S. Grand Avenue	Condominiums	151	du
			Retail	3,472	sf
			Restaurant	2,200	sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
7	Mixed-Use Project	250 S. Hill Street	Condominiums Retail/Restaurant	330 12,000	du sf
8		1245 W. Wilshire Boulevard	Medical Office	56,450	sf
9	Mixed-Use Project	220 E. Washington Boulevard	Apartments Retail Restaurant	357 7,750 7,750	du sf sf
10	Mixed-Use Project	900 W. Wilshire Boulevard	Mixed Use		
11		820 S. Towne Avenue	Elementary & Middle School	505	students
12	Mixed-Use Project	1902 E. Marengo Street	Retail Fast-food Restaurant High-Turnover Restaurant Medical Office	4,415 1,500 4,500 16,820	sf sf sf sf
13	Mixed-Use Project	900 N. Broadway	Condominiums Retail Restaurant	223 25,000 15,000	du sf sf
14	Mixed-Use Project	527 N. Spring Street	Apartments Retail Specialty Retail Restaurant	345 23,000 21,000 11,000	du sf sf sf
15	Mixed-Use Project	146 W. 11th Street	Office Retail Condominiums	32,670 37,600 565	sf sf du
16	Mixed-Use Project	1115 S. Hill Street	Condominiums Restaurant	172 6,850	du sf
17		540 S. Santa Fe Avenue	Office		
18	Mixed-Use Project	601 S. Main Street	Apartments Retail	444 32,000	du sf
19		1036 S. Grand Avenue	Restaurant	7,000	sf
20	Mixed-Use Project	300 S. Santa Fe Avenue	Apartments Retail Fast-food Restaurant Quality Restaurant	420 45,000 7,500 7,400	du sf sf sf
21	Mixed-Use Project	940 S Flower Street	School Apartments	1,450 112	students du
22	Mixed-Use Project	225 S. Los Angeles Street	Condominiums Retail	300 3,400	du sf
23	Mixed-Use Project	520 S. Mateo Street			
24	Mixed-Use Project	1133 S. Hope Street	Apartments Retail	208 5,029	du sf
25	Mixed-Use Project	427 W. 5th Street	Apartments Retail	615 16,309	du sf
26	Mixed-Use Project	1101 N. Main Street			
27	Mixed-Use Project	1335 W. 1st Street	Apartments Retail	101 3,514	du sf
28	Mixed-Use Project	905 E. 2nd Street	Condominiums	320	du

Project Number	Project Name	Location/Address	Project Description	Number	Units
			Retail	18,700	sf
29	Mixed-Use Project	745 S. Spring Street	Condominiums Retail	247 10,675	du sf
30	Mixed-Use Project	609 W. 8th Street	Condominiums Hotel Retail Restaurant	225 200 30,000 32,000	du rooms sf sf
31	Mixed-Use Project	1011 E. Adams Boulevard	Apartments Retail	80 17,372	du sf
32		810 E. Pico Boulevard	Wholesale Market	181,620	sf
33	Bus Facility	920 N. Vignes Street			
34	Mixed-Use Project	1102 W. 6th Street	Apartments Retail	648 39,996	du sf
35		1340 S. Olive Street	Condominiums	150	du
36	Mixed-Use Project	1211 W. Miramar Street	High School Apartments Retail	500 80 17,372	students du sf
37	Maintenance Facility	590 S. Santa Fe Avenue			
38		1828 E. Cesar Chavez Street	Medical Office	32,300	sf
39	Mixed-Use Project	710 S. Grand Avenue	Apartments Retail Restaurant	700 27,000 5,000	du sf sf
40		610 St. Louis Street	Senior Housing	97	du
41	Mixed-Use Project	1435 W. 3rd Street	Apartments Retail	122 5,000	du sf
42	Mixed-Use Project	237 S. Grand Avenue	Condominiums Apartments Retail Office	1,648 412 449,000 681,000	du du sf sf
43	Mixed-Use Project	201 S. Broadway		27,675	sf
44	Mixed-Use Project	1500 S. Figueroa Street	Apartments Retail	190 12,432	du sf
45	Mixed-Use Project	301 W. Olympic Boulevard	Apartments Retail Restaurant	300 14,500 8,500	du sf sf
46		150 N. Los Angeles Street	Office Retail Child Care	713,000 35,000 2,500	sf sf sf
47	Mixed-Use Project	899 S. Francisco Street	Condominiums Office Hotel Retail/Restaurant	836 988,225 480 46,000	du sf rooms sf
48	Mixed-Use Project	1306 S. Hope Street	Apartments Retail	419 42,000	du sf
49		1027 S. Olive Street	Apartments	100	du
50	Mixed-Use Project	1200 S. Grand Avenue	Apartments Retail	640 45,000	du sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
51	Mixed-Use Project	928 S. Broadway	Apartments Condominiums Retail	670 17 58,800	du du sf
52	Mixed-Use Project	534 S. Main Street	Apartments Retail Restaurant Fast-food Restaurant	160 18,000 3,500 3,500	du sf sf sf
53	Mixed-Use Project	1057 S. San Pedro Street	Office Retail Cinema Apartments Condominiums Hotel Medical Office	471,877 224,862 744 877 68 210 77,264	sf sf seats du du rooms sf
54	Mixed-Use Project	1329 W. 7th Street	Apartments Retail	94 2,000	du sf
55	Mixed-Use Project	840 S. Olive Street	Condominiums Restaurant Retail	303 9,680 1,500	du sf sf
56	Mixed-Use Project	1525 E. Industrial Street	Apartments Retail Restaurant	240 7,165 4,110	du sf sf
57	Mixed-Use Project	233 W. Washington Boulevard	Apartments Retail	160 24,000	du sf
58	Mixed-Use Project	1000 S. Grand Avenue	Apartments Restaurant	274 12,000	du sf
59	Mixed-Use Project	400 S. Broadway	Apartments Retail Bar	430 10,000 5,000	du sf sf
60		1185 W. Sunset Boulevard	Apartments	210	du
61	Mixed-Use Project	1001 S. Olive Street	Apartments Retail Restaurant	240 7,165 4,110	du sf sf
62	Mixed-Use Project	950 E. 3rd Street	School Retail Apartments	532 30,062 635	students sf du
63	Mixed-Use Project	920 S. Hill Street	Apartments Retail	216 3,900	du sf
64	Mixed-Use Project	955 S. Broadway	Apartments Retail	201 6,000	du sf
65	Mixed-Use Project	801 S. Olive Street	Apartments Restaurant	331 10,000	du sf
66	Mixed-Use Project	1212 W. Flower Street	Condominiums Retail Office	730 10,500 70,465	du sf sf
67	Mixed-Use Project	820 S. Olive Street	Apartments Retail	589 4,500	du sf

Project Number	Project Name	Location/Address	Project Description	Number	Units
68		459 Hartford Avenue	Apartments	94	du
69	Mixed-Use Project	700 W. Cesar Chavez Avenue	Apartments Restaurant	247 8,000	du sf
70	Mixed-Use Project	960 S. Olive Street	Apartments Restaurant	263 14,500	du sf
71	Mixed-Use Project	2051 E. 7th Street	Apartments Retail Restaurant	240 8,000 12,000	du sf sf
72	Mixed-Use Project	1148 S. Broadway	Apartments Retail	94 2,500	du sf
73	Mixed-Use Project	1111 S. Broadway	Apartments Office Retail	391 39,725 49,000	du sf sf
74	Mixed-Use Project	1247 S. Grand Avenue	Apartments Retail	118 5,125	du sf
75	Mixed-Use Project	1120 S. Grand Avenue	Apartments Hotel Retail	461 300,000 8,700	du sf sf
76	Mixed-Use Project	1230 S. Olive Street	Apartments Retail	362 4,000	du sf
77	Mixed-Use Project	1400 S. Figueroa Street	Apartments Retail	106 4,834	du sf
78	Mixed-Use Project	963 E. 4th Street	Office Retail Restaurant	79,000 25,000 20,000	sf sf sf
79		742 S. Hartford Avenue	Condominiums	58	du
80		401 N. Boylston Street	Apartments	101	du
81	Mixed-Use Project	1111 W. 6th Street	Apartments Retail Other Other Other	362 18,959 3,504 1,476 1,866	du sf sf sf sf
82	Mixed-Use Project	826 S. Mateo Street	Condominiums Other Other	90 11,000 5,600	du sf sf
83	Mixed-Use Project	1150 Wilshire Boulevard	Apartments Restaurant	80 4,589	du sf
84	Mixed-Use Project	737 S. Spring Street	Apartments Pharmacy	320 25,000	du sf
85		1218 W. Ingraham Street	Apartments	80	du
86	Mixed-Use Project	1145 W. 7th Street	Condominiums Apartments Retail	126 100 7,200	du du sf
87		1147 E. Palmetto			
88		2030 E. 7th Street	Office Retail	243,583 40,000	sf sf
89	Mixed-Use Project	732 S. Spring Street	Apartments	400	du

Project Number	Project Name	Location/Address	Project Description	Number	Units
			Pharmacy	15,000	sf
90	Mixed-Use Project	340 S. Hill Street	Apartments	428	du
			Restaurant	6,700	sf
91	Mixed-Use Project	360 S. Alameda Street	Apartments	55	du
			Other	2,500	sf
			Other	6,300	sf

Notes:
du = dwelling unit, sf = square feet; gsf = gross square feet
Source: Fehr & Peers, 2900 Wilshire Project Draft Transportation Impact Analysis, March 2016.



Source: Fehrs & Peers, March 2016



Figure II-30
Related Project Location Map

II. PROJECT DESCRIPTION

C. ENTITLEMENT REQUESTS

The Applicant is requesting approval of the following discretionary actions:

- (1) Site Plan Review; and
- (2) A 10% reduction in total open space pursuant to LAMC Section 12.21.G.3.

The Applicant will also 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 (for the export of approximately 76,441 cy of soil), removal/replacement of 22 street trees within the public right-of-way, and building and tenant improvements for the Project Site.

III. ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

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

Based on the criteria set forth above the Proposed Project is a mixed-use residential project located on an infill site within a Transit Priority Area as defined by CEQA.² The Project Site is located within 0.3 mile of the Wilshire/Vermont Metro Redline Station. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. See Figure II-6, Project Vicinity – Proximity to Transit Services in Section II, Project Description. Accordingly, the Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public

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

² City of Los Angeles, Department of City Planning, *City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 24, 2016.

Resources Code Section 21099. 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.

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

Less Than Significant Impact. The City's CEQA thresholds provide that a significant impact may occur if the Proposed Project includes a proposal to develop or allow development in an existing natural open space area, has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is currently developed with a surface parking, two one-story commercial buildings (a total existing building area of approximately 4,488 square feet), and a billboard. There is no significant vegetation on the Project Site. The Project Site is not located within or along a designated scenic corridor and no scenic views exist from or through the Project Site. The Proposed Project will include the demolition of the existing structures and the billboard to allow for the development and operation of a 23-story mixed use residential and commercial building. The scale and character of the area immediately surrounding the Project Site consists of structures that vary in height, massing, architectural style, and age, including multiple high-rise commercial buildings. To the north, across Wilshire Boulevard, is the Central Civil West Courthouse (600 S. Commonwealth Avenue), which is approximately 38 stories. Immediately north, across Wilshire Boulevard, is The Town House (2959-2973 Wilshire Boulevard), which is a 12-story vacant hotel. Additional high-rise buildings within one-quarter mile of the Project Site are located at 2975 Wilshire Boulevard (12 stories), 3045 Wilshire Boulevard (12 stories), 3075 Wilshire Boulevard (9 stories), 3050 Wilshire Boulevard (5 stories with a 241 foot spire), 3150 Wilshire Boulevard (23 stories), and 2701 Wilshire Boulevard (9 stories). Wilshire Boulevard is primarily a commercial corridor. The Proposed Project's height, scale, massing, and setbacks is consistent and compatible with the scale and massing of other high-rise developments in the immediate Project vicinity and viewshed. The proposed structure would include a maximum building height of approximately 268.5 feet above grade at the tower.

From a focal perspective, the Proposed Project would be compatible with other high-rise buildings along Wilshire Boulevard. From a panoramic perspective, panoramic views of the Downtown Los Angeles skyline are currently substantially hindered by intervening development, including several mid- to high-rise buildings, located east of the Project Site along Wilshire Boulevard. While the Proposed Project would provide a change in the skyline and contribute to the mid- to high-rise development that currently intermittently obstructs the long-range views of the Downtown Los Angeles skyline, the Proposed Project's scale and massing would not impede any scenic views of Downtown Los Angeles. Additionally, partial long-range panoramic views of the Hollywood Hills are currently available from the street level as well as from the upper floors of the residential buildings fronting Sunset Place. However, both public and private views are largely obstructed by intervening development between Sunset Place and the Hollywood Hills, including, but not limited to, the approximately 38-story Central Civil West Courthouse and the 12-story Town House. As such, there are no clear sight lines through the Project Site from either

public or private vantage points to the Hollywood Hills. Therefore, the Proposed Project would not have a substantial adverse effect on a scenic vista. Furthermore, as discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a mixed-use residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. Therefore, the Proposed Project's potential to result in a substantial adverse impact upon the environment is less than significant.

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. The City's CEQA thresholds provide that a significant impact may occur if scenic resources would be damaged and/or removed by development of a project. The Project Site does not contain any scenic resources. The Project Site is currently developed with a surface parking lot. There is no vegetation or unique geologic features on-site. Furthermore, the Project Site is not bordered by or within the viewshed of any City designated scenic highway. The Proposed Project is located adjacent to several historic buildings including:³ the 12-story Town House (National Register of Historic Places and Los Angeles Historic Cultural Monument), located immediately north of the Project Site across Wilshire Boulevard; the three to four-story Granada Buildings (National Register of Historic Places and Los Angeles Historic Cultural Monument), located southeast of the Project Site; the 9-story Bryson Apartment Hotel (National Register of Historic Places and Los Angeles Historic Cultural Monument), located east of the Project Site, and the one-story Felipe de Neve Branch Library (National Register of Historic Places, California Register of Historic Resources, and Los Angeles Historic Cultural Monument), located north of the Project Site. As discussed in response to Checklist Question I a), above, the Proposed Project has been designed in a manner that respects the scale and massing of the historic buildings in the immediate project vicinity, with distinguishing breaks in height and step-backs that align with the height of the historic buildings. Views of these historic buildings will be maintained and would not be damaged by the Proposed Project.

Additionally, the Proposed Project is located adjacent to Lafayette Park, across Wilshire Boulevard to the north. Immediately east of the Project site across Hoover Street are public tennis courts, an extension of Lafayette Park. This public park contains a children's play area, picnic tables, basketball courts, tennis courts, community room, soccer field, kitchen, stage, TV area, and skate park. Currently, sidewalks and roadways in the project vicinity such as Wilshire Boulevard, Hoover Street, and Sunset Place provide views of the park. Views of the main portion of Lafayette Park are limited by painted green wrought-iron security fencing along its perimeter as well as intermittently placed trees along most of its perimeter. Views of the main portion of Lafayette Park are further obscured as the interior of the park slopes downward from Wilshire Boulevard. Views of the tennis courts are also partially obstructed by intervening trees and development, including the Project Site. Development of the Proposed Project would not directly impact or adversely affect views of Lafayette Park. Therefore, the Proposed Project would not damage and/or remove any scenic resources within a State or City designated scenic highway,

³ *Historic Places LA, Los Angeles Historic Resources Inventory, website: <http://www.historicplacesla.org/index.htm>, accessed September 2015.*

and no impact would occur. Furthermore, as discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a mixed-use residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impacts on the environment.

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

Less Than Significant Impact. The City's CEQA thresholds provide that a significant impact may occur if the Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines. The Proposed Project will be required to comply with all applicable building code requirements, some of which relate to the general aesthetic appearance, upkeep, and character of the Project Site. Pursuant to Municipal Code Section 91.8104, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. Pursuant to Municipal Code Section 91.8104.15, the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. With respect to signage, the 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 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. As such, with adherence to these regulatory requirements, Project impacts upon the aesthetic character of the Project Site and surrounding environment would be less than significant.

Building Heights and Massing

The Project Site is currently developed with surface parking and two one-story commercial buildings. Buildings in the vicinity of the Project Site vary in building massing and height. In a few blocks radius of the Project Site, there are numerous commercial, office, restaurant, parking, and residential land uses ranging in height from one to thirty-eight stories above grade. Buildings in the vicinity of the Project Site include multiple heights. To the west of the Project Site, across an alley, are one to three-story commercial and multiple-family residential land uses. To the east of the Project Site, across S. Hoover Street, is an extension of Lafayette Park. To the north, across Wilshire Boulevard, are Lafayette Park, Central Civil West Courthouse (approximately 38-stories), and The Town House, a 12-story vacant hotel. To the south of the Project Site, across Sunset Place, are two to four-story commercial and multiple-family residential land uses. Existing views of the Project Site and surrounding land uses can be seen in Figures II-3 through II-5, located in Section II, Project Description.

The Proposed Project would alter the existing visual character of the Project Site, views along public rights-of way, and the pedestrian experiences along Wilshire Boulevard, S. Hoover Street, and Sunset Place. Existing views of the Project Site along Wilshire Boulevard, S. Hoover Street, and Sunset Place are of a typical commercial site and surface parking lot with a billboard. The two buildings on site are one story. The Proposed Project includes the development of a mixed-use residential and commercial building with four distinguishing breaks in height and step-backs. The proposed 23-story mixed-use building will have a maximum height of approximately 268.5 feet above grade with a break in height at approximately 215 feet above grade (Level 21). The proposed mixed-use building would also include an approximately 64 foot Level 7 (Amenity Podium), and an approximately 53 foot 6-story parking garage. Of the 644 total residential units, 437 residential units would be located in the 23-story residential tower and 207 residential units would be located in 7 stories that front Wilshire Boulevard and 4 stories that front Hoover Street and Sunset Place. The 207 residential units would wrap around the 7-story podium and the 6 above grade parking levels. The proposed mixed-use building would also have an approximately 81 foot transitional height limit. The Project's design, architectural materials, multiple heights, setbacks, and landscaping create a dynamic visual appearance that breaks up the Proposed Project's massing. Further, the Proposed Project's 15,500 square feet of commercial uses on the ground level fronting Wilshire Boulevard create a pedestrian scale environment. The design and configuration of the Proposed Project, as currently proposed, would be memorialized.

As such, the development of the Proposed Project would change the existing visual character of the Project Site and the immediate surrounding areas in a manner that would complement the surrounding land uses. Further, the Project's proposed density and height is allowed under the existing zoning and General Plan Land Use Designation on the Project Site. As such, the Project's building height and massing would result in a less than significant aesthetic impact.

Shade/Shadow

Building shadow is a general condition of the urbanized environment, and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. In accordance with the *L.A. CEQA Thresholds Guide*, "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort of commerce. Pursuant to the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if the Proposed Project's structures cast shadows on a shadow sensitive land use for more than three hours each day between the hours of 9:00 a.m. and 3:00 p.m. during winter months, and for more than four hours each day between the hours of 9:00 a.m. and 5:00 p.m. during the summer months. While the Proposed Project would include the development of a 23-story mixed-use building, which could create building shadow, as discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a mixed-use residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. Therefore, the Proposed Project's shadow impacts would therefore be less than significant.

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

Less Than Significant Impact. The City's CEQA thresholds provide that a significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the proposed project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

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 will be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. A moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along Wilshire Boulevard, S. Hoover Street, and Sunset Place. The Project's lighting fixtures would be installed and operated in accordance with 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code. The Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. The Proposed Project would include four driveways located on Commonwealth Avenue and Wilshire Boulevard, Hoover Street, and two driveways on Sunset Place, which would direct vehicle headlights towards the properties across the street as vehicles exit the Project Site. A moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along Wilshire Boulevard, Hoover Street, and Sunset Place. As such, vehicles leaving the Project Site would not substantially increase light in the Project Site area. The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas. Thus, with code compliance, the Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses.

The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas. Therefore, the Proposed Project's impacts would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding areas.

Furthermore, as discussed above, pursuant to SB 743 and the provisions set forth by P.R.C. § 21099, the Proposed Project is classified as a mixed-use residential project on an infill lot in a transit priority area and, as such, its aesthetic impacts shall not be considered a significant impact on the environment. Therefore, the Proposed Project's impacts would be less than significant.

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 91 related projects would result in an intensification of existing prevailing land uses in the Transit Priority Area within the Wilshire 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.

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 in a highly developed area of 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 2012" 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.⁴ Therefore, under current analysis, no impact to agricultural lands would occur.

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

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 Los Angeles Municipal Code (LAMC). The Project Site is currently zoned C4-2 with the land use designation of Regional Center Commercial and is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no

⁴ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>, accessed March 2016.*

Williamson Act Contracts are in effect for the Project Site.⁵ 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 C4-2, which has a land use designation of Regional Center Commercial in the Wilshire Community Plan. 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 a paved surface parking lot and two one-story commercial buildings. The Project Site is located in a highly developed area 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 2012” 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.⁶ Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the 91 related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural 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 2012 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.⁷ The Project Site is located in an urbanized area in the Wilshire 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.

⁵ *State of California Department of Conservation, Division of Land Resource Protection, Land Conservation Act Maps, Los Angeles County Williamson Act FY 2015/2016, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>, accessed March 2016.*

⁶ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>, accessed March 2016.*

⁷ *Ibid.*

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 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 (“Final 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 the 2011 Federal Transportation Improvement Program (FTIP) and with SCAG’s previously adopted 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). 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 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), the Proposed Project is consistent with the regional population and employment 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). A HQTA is defined as generally a 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 Proposed Project would concentrate new development and jobs within a half of a mile (walking distance) from the Wilshire/Vermont Metro rail station and is served by several Metro bus lines. Thus, the Project’s location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips. 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 as compared to the base trip rates for similar stand-alone residential 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 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 Project construction schedule of approximately 32 months, with full operation occurring in 2020. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing, (2) excavation and grading, (3) building construction, and (4) architectural coating/finishing. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving site excavation, grading and foundation preparation would primarily generate PM_{2.5} and PM₁₀ 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 ROG 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.

The analysis of daily construction emissions has been prepared 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 construction phase. 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. For purposes of this analysis, the Proposed Project's construction activities would be required to comply with the provisions of 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: (1) 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.

**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	--	--	--	--	1.36	0.21
On-Site Off-Road (Diesel Equipment)	2.76	26.76	15.56	0.02	1.65	1.54
Off-Site (Hauling, Vendor, Worker)	0.23	4.80	1.60	0.01	0.42	0.13
Total Emissions	2.99	31.56	17.16	0.03	3.43	1.88
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading						
On-Site Fugitive Dust	--	--	--	--	2.79	1.50
On-Site Off-Road (Diesel Equipment)	2.32	26.16	10.78	0.02	1.30	1.19
Off-Site (Hauling, Vendor, Worker)	1.57	49.74	10.27	0.12	2.95	0.99
Total Emissions	3.89	75.90	21.05	0.14	7.04	3.68
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction						
On-Site Off-Road Diesel Equipment	3.58	25.31	18.11	0.03	1.64	1.56
Off-Site (Hauling, Vendor, Worker)	5.01	21.68	39.10	0.11	8.43	2.41
Total Emissions	8.59	46.99	57.21	0.14	10.07	3.97
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Architectural Finishing						
On-Site Architectural Coating	32.97	--	--	--	0.00	0.00
On-Site Off-Road Diesel Equipment	0.27	1.84	1.84	<0.01	0.13	0.13
Off-Site Hauling/Vendor/Worker Trips	0.69	0.49	5.27	0.01	1.46	0.40
Total Emissions	33.93	2.33	7.11	0.01	1.59	0.53
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Source: CalEEMod 2016.3.1. Calculation worksheets are provided in Appendix A to this IS/MND.</i>						

Wetting the soil during earthwork activities could reduce fugitive dust by as much as 50%; (2) 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; (3) 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; (4) all dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust; (5) all dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust; (6) general contractors shall maintain and operate construction equipment so as to minimize exhaust emissions; and (7) trucks having no current hauling activity shall not idle but be turned off. The project shall also comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. Additionally, 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. The Proposed Project would also be 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. As shown in Table III-1, below, 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.

Operational Emissions

Air pollutant emissions are currently generated at the Project Site by the existing commercial buildings. 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						
Mobile (Vehicles)	0.12	0.55	1.56	<0.01	0.34	0.10
Energy (Natural Gas)	<0.01	0.01	0.01	<0.01	<0.01	<0.01
Area Source	0.10	0.00	<0.01	0.00	0.00	0.00
Total Emissions	0.22	0.56	1.57	<0.01	0.34	0.10
Wintertime (Non-Smog Season) Emissions						
Mobile (Vehicles)	0.11	0.57	1.47	<0.01	0.34	0.10
Energy (Natural Gas)	<0.01	0.01	0.01	<0.01	<0.01	<0.01
Area Source	0.10	0.00	<0.01	0.00	0.00	0.00
Total Emissions	0.21	0.58	1.48	<0.01	0.34	0.10
<i>Source: CalEEMod 2016.3.1, Calculation worksheets are provided in Appendix A to this IS/MND.</i>						

The Proposed Project would result in the demolition of the existing commercial buildings and billboard and the development and operation of a mixed-use building with 644 residential dwelling units and approximately 15,500 square feet of commercial retail. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. During operation, the Proposed Project would be required to comply with all applicable SCAQMD requirements. As required by South Coast Air Quality Management District Regulation XIII, New Source Review, 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). The Proposed Project's

regional operational emissions are presented in Table III-3, Proposed Project 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						
Mobile (Vehicle) Sources	6.66	30.62	69.79	0.22	16.96	4.69
Energy (Natural Gas)	0.22	1.94	0.96	0.01	0.16	0.16
Area Source	16.22	0.62	53.42	<0.01	0.29	0.29
Total Project Emissions	23.04	33.18	124.17	0.23	17.41	5.14
<i>Less Existing Project Site Emissions</i>	<i>(0.22)</i>	<i>(0.56)</i>	<i>(1.57)</i>	<i>(<0.01)</i>	<i>(0.34)</i>	<i>(0.10)</i>
NET Project Emissions	22.82	32.62	122.60	0.23	17.07	5.04
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Mobile (Vehicle) Sources	6.32	31.00	67.16	0.21	16.96	4.69
Energy (Natural Gas)	0.22	1.94	0.96	0.01	0.16	0.16
Area Source	16.22	0.62	53.42	<0.01	0.29	0.29
Total Project Emissions	22.76	33.56	121.54	0.22	17.41	5.14
<i>Less Existing Project Site Emissions</i>	<i>(0.21)</i>	<i>(0.58)</i>	<i>(1.48)</i>	<i>(<0.01)</i>	<i>(0.34)</i>	<i>(0.10)</i>
NET Project Emissions	22.55	32.98	120.06	0.22	17.07	5.04
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
<i>Source: CalEEMod 2016.3.1, Calculation worksheets are provided in Appendix A to this IS/MND.</i>						

- 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, PM₁₀, and PM_{2.5},⁸ related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In

⁸ The Los Angeles County portion of the Basin is also currently a nonattainment area for the federal lead (Pb) standard due to source-specific monitoring, but Pb air quality data and attainment has been addressed separately in greater detail in the 2012 Lead SIP for Los Angeles County. (2012 AQMP, pp.2-1.

determining the significance of a projects cumulative contribution to regional air pollution, 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.⁹

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,¹⁰ 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, PM₁₀, 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 PM₁₀, 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 PM₁₀ 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

⁹ *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

¹⁰ *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

County area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are the multi-family residences fronting Sunset Place to the west and south of the Project Site and Lafayette Park and multi-purpose center located north and east of the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a three-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase.

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, 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 three-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	26.76	15.56	3.01	1.75
Grading	26.16	10.78	4.09	2.70
Building Construction	25.31	18.11	1.64	1.56
Architectural Coatings	1.84	1.84	0.13	0.13
SCAQMD Localized Thresholds ^c	126	1,319	11	6
<i>Potentially Significant Impact?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Notes:

^a The localized thresholds for all phases are based on a receptor within a distance of 25 meters in SCAQMD's SRA 1 for a Project Site of 3 acres.

^b The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.

^c The thresholds for a 3-acre site were estimated using linear regression as recommended by SCAQMD. SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K - Linear Regression, February 2005.*

Source: CalEEMod 2016.3.1, Calculation worksheets are provided in Appendix A to this IS/MND.

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)

The Proposed Project consists of a mixed-use residential development with retail uses and 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. 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. 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 Proposed Project 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. The Proposed Project would also be subject to applicable regulatory compliance measures with respect to controlling odors from any operational activities within the proposed commercial uses. As such, the Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. Thus, with implementation of this regulatory compliance measure, potential operational odor impacts would be further reduced to less than significant levels.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 91 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 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. 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?**

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or

the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is improved with a paved surface parking lot and two one-story commercial 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. Thus the potential for impacts to occur to 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 would be less than significant.

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. A surface parking lot and two one-story commercial buildings occupy the Project Site. As discussed above in Section IV(a), all of the trees on-site are non-native and are not protected tree species under the Native Protected Tree Ordinance. 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.

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 a surface parking lot and two one-story commercial buildings. An existing storm drain that conveys storm water in a southerly direction also occupies the Project Site. The Project Site contains impermeable surfaces. There are no wetlands or natural drainage channels on the Project Site. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section IV(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 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 will 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)?

Potentially Significant Impact Unless Mitigation Incorporated. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, 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. The Project Site is improved with a surface parking lot and two one-story commercial buildings. There are 31 existing trees located on the Project Site, including evergreen pears (*Pyrus kawakamii*), Mexican fan palms (*Washingtonia robusta*) and date palms (*Phoenix dactylifera*). All of the trees on-site are non-native and are not protected tree species under the Native Protected Tree Ordinance. The public right-of-way contains 22 street trees adjacent to the Project Site, including 12 evergreen pears, 3 Mexican fan palms, 1 date palm, 4 Bottlebrush trees (*Callistemon viminalis*), and 2 Queen palms (*Syagrus Romanzoffiana*). The existing trees within the public right-of-way are not protected species as defined by the City of Los Angeles' Protected Tree Ordinance. The development of the proposed project would require the removal of all non-protected tree species within the Project Site and the 22 street trees within the public right-of-way. Removal of the 22 trees in the public right-of-way requires approval by the Board of Public Works. Implementation of mitigation measure BIO-1 would reduce potential impacts associated with the loss of trees to a less than significant impact. Further, the Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory non-game birds. Compliance with mitigation measure BIO-2 would ensure that potential impacts to nesting bird species would be less than significant.

Mitigation Measures:

BIO-1 Tree Removal (Non-Protected Trees)

- 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 1:1 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.

BIO-2 (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 or 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.

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 mitigation. Development of the Proposed Project in combination with the 91 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, Federal Migratory Bird Treaty Act, and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. 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.¹¹

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.

As previously stated, the Project Site includes a surface parking lot, two one-story commercial buildings (a total existing building area of approximately 4,488 square feet) and a billboard. There are no known or potential historical resources that occur on the Project Site. The Proposed Project is located near several historic buildings including:¹² the 12-story Town House (National Register of Historic Places and Los Angeles Historic Cultural Monument), located immediately north (approximately 115 feet) of the Project Site across Wilshire Boulevard; the three to four-story Granada Buildings (National Register of Historic Places and Los Angeles Historic Cultural Monument), located 0.2 miles southeast of the Project Site; the 9-story Bryson Apartment Hotel (National Register of Historic Places and Los Angeles Historic Cultural Monument), located 0.2 miles east of the Project Site, and the one-story Felipe de Neve Branch Library (National Register of Historic Places, California Register of Historic Resources, and Los Angeles Historic Cultural Monument), located 0.2 miles north of the Project Site. Due to distance between the Project Site and these historic buildings, the Proposed Project would not directly or indirectly affect the historical significance of these historic buildings. 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. Therefore, the Proposed Project would have a less than significant impact with respect to changes in historical resources.

¹¹ CEQA Guidelines, Section 15064.5(b)(1).

¹² Historic Places LA, Los Angeles Historic Resources Inventory, website: <http://www.historicplacesla.org/index.htm>, accessed September 2015.

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 would disturb archaeological resources. No known archaeological sites are identified on the Project Site. There is no evidence that suggests any archaeological sites or archaeological resources exist on the Project Site.¹³ There is no evidence that suggests any archaeological sites or archaeological resources exist on the Project Site. The Project Site has been previously developed and is located in a highly urbanized area of Los Angeles. Historic information from the Phase I ESA Report (See Appendix D.1 of this IS/MND) indicates that the Project Site was used for both residential and commercial purposes. Prior the 1907, the eastern half of the Project Site was improved with residential structures and by 1921 the western portion of the Project Site also contained residential structures. From the late 1920's to the late 1930's, the Project Site was occupied by a gasoline service station. By the 1950's, the residences on the northern half of the Project Site were demolished and converted as commercial buildings. By 1970, the two commercial structures on the northeastern portion of Project Site were utilized as restaurants and residential structures were present on the southern portion of the Project Site until the mid-to-late 1970's. Currently, the Project Site is utilized as a rental car business, Midway Car Rental, with a surface parking lot and two one-story commercial buildings. The Proposed Project will include demolition of the surface parking lot and the two one-story commercial buildings and excavation to a depth of up to 16 feet below grade to construct the 23-story mixed-use building. Thus, the potential exists for the accidental discovery of unknown and unrecorded archaeological materials. In the unlikely event any archaeological resources are encountered during the construction phase, the discovery of such materials would be mitigated to less than significant levels through compliance with the following applicable regulatory compliance measure. If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Modified Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Due to the absence of any known archeological resources, no further mitigation measures are warranted. Because the presence or absence of such materials cannot be determined until the site is excavated, compliance with the regulatory compliance measure discussed above would ensure any impacts to archaeological resources encountered during construction would be less than significant.

¹³ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

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 a paved surface parking lot and two one-story commercial buildings. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹⁴ 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. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Implementation of the above regulatory compliance measure will ensure that if any such resources are found during construction of the Proposed Project, they would be handled according to the proper regulations and any potential impacts would be reduced to less than significant levels.

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 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 occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. To reduce potential impacts related to disturbance of unknown human remains, the Proposed Project would be required to comply with the following regulatory compliance measure. 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: (1) 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); (2) If

¹⁴ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC); (3) The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American; (4) 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; and (5) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Implementation of the above regulatory compliance measure would reduce potential impacts related to the disturbance of unknown human remains to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the other 91 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 mitigation. 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 preliminary Geotechnical Report prepared by Geotechnologies, Inc., Preliminary Summary of Geotechnical Explorations and Observations, Proposed Mixed-Use Development, 2900 Wilshire Boulevard, Los Angeles, California, dated March 3, 2016 ("Geotechnical Report"). The Geotechnical Report is included as Appendix B.

- 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.

On October 4, 2006, a previous geotechnical report was performed on the Project Site by MACTEC, which included a total of nine borings performed on the Project Site. Geotechnologies, Inc. performed four borings as part of their field investigation on September 16 and 17, 2015. Based on the information contained in the Geotechnical Report, the Project Site is underlain by existing fill, older alluvium, and bedrock of the mid-Miocene Puente Formation. The existing fill materials underlying the Project Site consist of dark brown, moist, medium dense, stiff, and fine grained silty sands and sandy silts with

varying amounts of gravel and minor debris. Between 3 and 7 ½ feet of the existing fill was encountered during exploration. The older alluvium consist of silty sands and sandy silts. The older alluvium is characterized as generally brown, slightly moist to moist, dense, stiff, and fine grained with minor amounts of gravel. The bedrock of the upper-Miocene Puente Formation was encountered at depths ranging between 3 and 7 ½ feet below the ground surface in all of the borings. The bedrock consists of siltstones and sandstones, which are generally gray to dark gray, and brown to dark brown in color, moist, hard, moderately weathered, fine grained and bedded. The Geotechnical Report also found minor to moderate amounts of naturally occurring tar within the fill, older alluvium, and bedrock underlying the Project Site and multiple tar seeps occur at the ground surface throughout the Project Site. A detailed description of the soil conditions may be obtained from the individual logs of the subsurface excavations in the Geotechnical Report. Groundwater was not encountered during exploration to a maximum depth of 70 feet below the ground surface. However, the Seismic Hazard Zone Report (SHZR) for the Hollywood 7½-Minute Quadrangle indicates the historic highest groundwater level in the vicinity of the Project Site was 18 to 20 feet below the ground surface. The Geotechnical Report determined that fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors not evident at the time of the measurements performed in the Geotechnical Report and fluctuations may also occur across the Project Site.

The closest active fault to the Project Site is the Puente Hills Blind Thrust located approximately 0.3-mile of the Project Site.¹⁵ Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 M_w 5.9 Whittier Narrows earthquake and the January 17, 1994 M_w 6.7 Northridge earthquake were a result of movement on these buried thrust faults. The Los Angeles segment of the Puente Hills Blind Thrust is located approximately 0.3-mile of the Project Site.¹⁶ This thrust fault is not exposed at the surface and does not present a potential surface fault rupture hazards; however, this active feature is capable of generating future earthquakes. 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.

The Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. No active or potential active faults with the potential for surface fault rupture are known to pass directly beneath 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. However, the Project Site is located in the seismically active Southern California region, and could be

¹⁵ City of Los Angeles, Department of City Planning, *City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 24, 2016.

¹⁶ City of Los Angeles, Department of City Planning, *City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report*, website: www.zimas.lacity.org, accessed February 24, 2016.

subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

Based on these considerations, the potential for surface ground rupture at the Project Site is considered low, and the potential for impacts associated with surface fault rupture would be considered less than significant. The Project would adhere to current engineering standards and the seismic safety requirements set forth in the City of Los Angeles Building Code (LABC) and the Los Angeles Municipal Code (LAMC). In addition, geologic and geotechnical evaluations of the Proposed Project would follow the guidelines presented in CGS *Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California*, which provides guidance for evaluation and mitigation of earthquake-related hazards (other than fault rupture). Thus, impacts related to strong seismic shaking would be reduced to less than significant levels. Furthermore, the design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety. With incorporation of this regulatory compliance measure, potential impacts associated with seismic safety would be further reduced to less than significant levels.

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 in the seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. 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 within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The primary seismic hazard for this Project Site is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. However, this hazard and the effects of ground shaking are common in Southern California. Conformance with current building codes and engineering practices during the Project's design and construction would mitigate the potential effects of ground shaking. Seismically induced settlement is often caused when loose to medium-dense granular soils are densified during ground shaking. Settlement of the foundation system is expected to occur on initial application of loading. Differential settlement is not expected to exceed one half inch over a distance of 20 feet. Seismically induced settlement is considered to be less than significant impact. The Project Site is considered suitable for the construction of 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, with implementation of the regulatory compliance measure above, which states the design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, impacts associated with seismic hazards would be reduced to a less than significant level.

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?

No 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 a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil.

Based on the State of California Seismic Hazards Map for the Hollywood 7½-Minute Quadrangle and the City of Los Angeles General Plan Safety Element, the Project Site is not located in an area designated as “liquefiable.” Additionally, the Project Site is not located within an area identified as having a potential for liquefaction as identified in the County of Los Angeles Safety Element of the General Plan and the City of Los Angeles Safety Element of the General Plan (1996). The historic high groundwater level in the site vicinity is reported to be 18 to 20 feet below the ground surface according to the Seismic Hazard Zone Report (SHZR) for the Hollywood 7½-Minute Quadrangle. The Proposed Project would adhere to current engineering standards and the seismic safety requirements set forth in the City of Los Angeles Building Code (LABC) and the Los Angeles Municipal Code (LAMC). Based on these considerations, the potential for liquefaction of the Project Site is very low, and no surface manifestations of liquefaction are expected at the Project Site. Therefore, no impact would occur.

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 is located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project Site is not located within a City of Los Angeles Hillside Grading Area or Hillside Ordinance Area. The County of Los Angeles Safety Element, indicates the Project Site is not within an area identified as having a potential for slope instability. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low. Thus, the probability of landslides, including seismically induced landslides, is considered to be very low. 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 and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Additionally, the Proposed Project would be required to comply with the following regulatory compliance measures. The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. Chapter IX, Division 70 of the Los Angeles Municipal Code 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 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. Thus, implementation of the above regulatory compliance measures would further ensure a less-than-significant impact would occur with respect to 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 that is susceptible to liquefaction or collapse. The Geotechnical Report also stated though caving could not be observed during borings as part of their field investigation, excavations that encounter

granular cohesionless soils, and excavations below the groundwater table will most likely experience caving. The Proposed Project would comply with the Los Angeles Building Code and in accordance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project.

As discussed above, the Geotechnical Report found minor to moderate amounts of naturally occurring tar within the fill, older alluvium, and bedrock underlying the Project Site and multiple tar seeps occur at the ground surface throughout the Project Site. However, the Geotechnical Report concluded, based upon the completed geotechnical exploration, preliminary evaluation, and research, the proposed development is considered feasible from a geotechnical engineering standpoint. Additionally, according to Phase I ESA, the Project Site is located within a City of Los Angeles Methane Buffer Zone. Although the Project Site is located in a City-designated Methane Zone, EP Associates reviewed the California Division of Oil, Gas and Geothermal (CADOGG) Resources Well Finder Website for oil wells in the vicinity of the Site. The Project Site is not located within the boundaries of any oil or gas fields.¹⁷ Additionally, the Proposed Project would implement the regulatory compliance measure listed above, which states the design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety and the regulatory compliance measure discussed in Section VIII (Hazards and Hazardous Materials), below, which states, prior to the issuance of a building permit the Project Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall also implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval. Implementation of these regulatory compliance measures would ensure impacts would be less than significant.

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?

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 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. All grading activities would comply with the requirements and standards designed to limit potential impacts to acceptable levels under provision of the Department of Building and Safety. In addition, all on-site grading and site preparation would comply with applicable provisions of

¹⁷ EP Associates, *Phase I Environmental Site Assessment, 16-Lot Commercial Property, 2926 and 2950 Wilshire Boulevard, Los Angeles, California, dated April 18, 2008. See Appendix D of this IS/MND.*

Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With adherence to requirements and regulatory compliance measures, no impact would occur with respect to expansive soils.

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 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 implement the appropriate mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance measures recommended above, Proposed Project impacts would be further reduced to less than significant levels. 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 (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF₃), and water vapor (H₂O). CO₂ 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 CO₂ equivalents (CO₂e).

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 MMTCO₂e to 431 MMTCO₂e based on the scientifically updated global warming potential (GWP) values in the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report.¹⁸ The total future emissions forecasted in the 2020 BAU scenario were also updated from the previously adopted estimate of 596 MMTCO₂e to 509 MMTCO₂e. 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). As shown in Table III-5, below, the State anticipates it will meet its 2020 GHG emissions limit of 431 MMTCO₂e 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 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 ₂ e Emissions (MMTCo ₂ e) ^[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.	

While the Scoping Plan does not provide any specific mandates or policies that directly applies to CEQA Projects, statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the California Green Building Standards (CALGreen) Code and other State-mandated laws and regulations. Originally adopted in 2008, the CALGreen Code included all voluntary

¹⁸ The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.

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. Effective January 2014, the scope of the CALGreen Code was expanded to all residential buildings, including high-rise residential, as well as to additions or alterations with increases in conditioned space.

L.A. 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 CO₂ to 35% 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.

L.A. Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181480), 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% 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% construction waste recycling levels. Additionally, new construction shall comply with Section 99.04.106.4.1 and 99.04.106.4.2 to facilitate future installation of electric vehicle supply equipment (EVSE). Pursuant to Section 99.04.106.4.2 (Multifamily Dwellings), at least five (5)% of the total parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future EVSE. 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: Towards a Sustainable Future (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/residential projects that emit greater than 3,000 metric tons of CO₂e 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. The *L.A. CEQA Thresholds Guide* does not provide any guidance as to how climate change issues are to be addressed in CEQA documents. Furthermore, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use 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 Proposed Project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) whether the Proposed Project emissions exceed a threshold of significance that the lead agency determines applies to the Project; (3) the extent to which the Proposed 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.

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 LA Green Building Code.

Baseline GHG Emissions

To determine the extent to which the Proposed Project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting, the average annual GHG emissions generated by the existing commercial office building were estimated utilizing CalEEMod *Version 2016.3.1* modeling software, as recommended by the SCAQMD. Table III-6, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with existing operations at the Project Site. As shown in Table III-6, the existing operations on the Project Site generate approximately 104.04 CO₂e MTY.

**Table III-6
Existing Project Site Greenhouse Gas Emissions**

Emissions Source	CO ₂ e Emissions (Metric Tons per Year)
Mobile	56.14
Energy - Electricity	33.36
Energy – Natural Gas	2.52
Area	<0.01
Water	9.92
Waste	2.10
Total	104.04
<i>Source: CalEEMod 2016.3.1, Calculation data and results provided in Appendix C, Greenhouse Gas Emissions Calculations Worksheets.</i>	

Construction GHG Emissions

The next step in the process was to quantify the estimated construction related GHG emissions. 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 32-month duration of construction activities. As shown in Table III-7, the total GHG emissions from the Proposed Project's construction activities would be approximately 3,623.18 CO₂e MTY with the greatest annual emissions of 1,668.55 metric tons occurring in year 2018.

**Table III-7
Project Construction-Related Greenhouse Gas Emissions**

Year	CO ₂ e Emissions (Metric Tons per Year) ^a
2017	899.42
2018	1,668.55
2019	1,037.49
2020	17.72
Total Construction GHG Emissions	3,623.18
<i>Source: CalEEMod 2016.3.1, Calculation data and results provided in Appendix C, Greenhouse Gas Emissions Calculations Worksheets.</i>	

Operational 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 Project's compliance with the *L.A. Green Building Code* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its close proximity to a transit station, and its walking distance to a major employment center. For purposes of demonstrating the Proposed Project's consistency with AB 32 and the State's goals for reducing GHG emissions to 1990 levels by 2020, the Project's greenhouse gas emissions were quantified to reflect the Project's design features such as being an infill development with applicable trip credits for increased density, walkability, transit accessibility, proposing Energy Star rated appliances, and as otherwise being built in compliance with all applicable Green Building Code requirements and applicable regulatory measures (i.e., compliance with Rule 403 (dust suppression), low VOC coatings, increasing energy conservation beyond Title 24, implementing on-site solid waste recycling program).

As shown in Table III-8, below, the Proposed Project would result in a net increase of 6,107.01 CO₂e MTY as compared to existing conditions. For comparative purposes, the GHG emissions from a project of the same size and proposed land uses, but without the GHG-reducing design features described above for the Proposed Project was quantified. This comparative analysis demonstrates the effect the Proposed Project's compliance with SB 375's citing criteria, and the structural and operational design features such as installing energy efficient lighting, low flow plumbing fixtures, Energy Star-rated appliances, and implementing a construction and operational recycling program during the life of the Project would have with respect to reducing GHG emissions. As shown in Table III-8, the Proposed Project's consistency with applicable plans, policies and code requirements imposed through the City of Los Angeles Green Building Ordinance for purposes of conserving resources and reducing GHG emissions, yields an approximate 30% reduction as compared to a base project without such design features and compliance measures.

Through required implementation of the *L.A. Green Building Code*, the Project's mixed-use design, and the Project's location on an infill site, 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. The following describes the benefits and applicability of the Proposed Project's compliance measures and design features that serve to reduce the carbon footprint of the development:

- 1. Infill Development.** The Proposed Project is located on an infill site that is currently developed with commercial land uses and is located within a transit priority area. 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.

**Table III-8
Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year)		
	Base Project Without GHG Reduction Features	Proposed Project	Percent Reduction
Mobile (Motor Vehicles)	5,081.36	2,978.77	41%
Energy - Electricity	2,413.84	2,158.60	11%
Energy – Natural Gas	454.88	408.45	10%
Area	11.14	11.14	0%
Water	550.32	440.26	20%
Waste	186.12	93.06	50%
Construction Emissions ^a	120.77	120.77	--
Project Emissions	8,818.43	6,211.05	30%
<i>Less Existing Project Site</i>	<i>-104.04</i>	<i>-104.04</i>	<i>--</i>
Project Net Emissions	8,714.39	6,107.01	30%

^a The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Appendix C, Greenhouse Gas Emissions Calculations Worksheets.

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.** As mandated by the L.A. Green Building Code, the Proposed Project will be required to meet or exceed Title 24 2016 standards and include ENERGY STAR appliances.
4. **Solid Waste Reduction Efforts.** The Project is subject to construction waste reduction of at least 50%. In addition, operation of the Project is subject to AB 939 requirements to divert 50% of solid waste to landfills through source reduction, recycling, and composting. As required by the California Solid Waste Reuse and Recycling Access Act of 1991, the Project will provide adequate storage areas for collection and storage of recyclable waste materials.
5. **Water Conservation.** The 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%. 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. Therefore, the 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.

Therefore, as demonstrated above, the Proposed Project's design features and compliance with regulatory measures 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 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.

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. 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 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 a mixed-use residential and commercial development is 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 30% reduction in GHG emissions with GHG reduction measures in place as compared to the 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

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

- Phase I Environmental Site Assessment, 16-Lot Commercial Property, 2926 and 2950 Wilshire Boulevard, Los Angeles, California, prepared by EP Associates, dated April 18, 2008 (“Phase I ESA”);
- Report of Environmental Site Assessment Phase II, Existing Commercial Property 2900 – 2950 Wilshire Boulevard Wilshire Boulevard, Los Angeles, California, prepared by Advanced Geotechniques, dated June 16, 2008 (“Phase II ESA”); and
- Additional Environmental Site Assessment, Midway Car Rental, 2902 Wilshire Boulevard, Los Angeles, California, prepared by Environ Phase Consulting Co., dated August 25, 2015 (“Additional ESA”).

The Project Phase I ESA is included as Appendix D.1, the Project Phase II ESA is included as Appendix D.2, and the Project Additional ESA is included as Appendix D.3.

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

No Impact. The Proposed Project would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site, and the use of these substances would comply with State Health Codes and Regulations. Thus, 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. Therefore, no impact would occur.

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 significant impact may occur if a project utilizes quantities of hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

A complete historical record of the building activities and owners of the buildings on the Project Site are listed in the Phase I ESA (see Appendix D.1). Historic information indicates that the Project Site was used for both residential and commercial purposes. Prior the 1907, the eastern half of the Project Site was improved with residential structures and by 1921 the western portion of the Project Site also contained residential structures. From the late 1920's to the late 1930's, the Project Site was occupied by a gasoline service station. By the 1950's, the residences on the northern half of the Project Site were demolished and converted as commercial buildings. By 1970, the two commercial structures on the northeastern portion of Project Site were utilized as restaurants and residential structures were present on the southern portion

of the Project Site until the mid-to-late 1970's. Currently, the Project Site is utilized as a rental car business, Midway Car Rental, with a surface parking lot and two one-story commercial buildings.

No on-site RECs have been noted in the Phase I ESA. No historical RECs were found in association with the adjoining properties. However, one historical REC was noted on the Project Site in the Phase I ESA. This historical REC was the building permits records indicate that a gasoline service station operated at the northeast corner of the Project Site from the late 1920's until the late 1930's. EP Associates recommended a subsurface investigation be conducted at the northeast corner of the Project Site to assess the possible presence of UST's and associated piping as well to determine if historical operation of the gasoline service station has adversely impacted the Project Site. A Phase II ESA was performed by Advanced Geotechniques to analyze the subsurface materials at the Project Site for contamination beneath the Project Site as a result of nearby properties and previous uses on the Project Site, particularly the gasoline service station. The Phase II ESA concluded that soil contamination within the site appeared to be close to nil and no further assessment was necessary.¹⁹ An Additional ESA was conducted by Environ Phase Consulting Co. on August 25, 2015. The Additional ESA included advancing six soil borings, collection of two shallow depth soil vapor samples, collection of soil samples for geological logging, field screening, and laboratory analysis to evaluate the impact of petroleum based contaminants beneath the Project Site as a result of the gasoline service station historical use on the Project Site. The Additional ESA identified a former location of a UST based on a rectangular area of former excavation from the geophysical survey. However, the Additional ESA concluded, based on the results from the samples taken, the petroleum based contaminants did not exceed threshold levels and no further subsurface investigation is necessary.²⁰

The Geotechnical Report found minor to moderate amounts of naturally occurring tar within the fill, older alluvium, and bedrock underlying the Project Site and multiple tar seeps occur at the ground surface throughout the Project Site. However, the Geotechnical Report concluded, based upon the completed geotechnical exploration, preliminary evaluation, and research, the proposed development is considered feasible from a geotechnical engineering standpoint. Additionally, according to Phase I ESA, the Project Site is located within a City of Los Angeles Methane Buffer Zone. Although the Project Site is located in a City-designated Methane Zone, EP Associates reviewed the California Division of Oil, Gas and Geothermal (CADOGG) Resources Well Finder Website for oil wells in the vicinity of the Site. The Project Site is not located within the boundaries of any oil or gas fields.²¹ Therefore, oil wells are not considered to be a Recognized Environmental Conditions ("RECs") (CADOGG, 2015). Additionally, the Proposed Project would be required to comply with the following regulatory compliance measure: As the

¹⁹ *Advanced Geotechniques: Report of Environmental Site Assessment Phase II, Existing Commercial Property 2900 – 2950 Wilshire Boulevard Wilshire Boulevard, Los Angeles, California, dated June 16 2008. See Appendix D of this IS/MND.*

²⁰ *Environ Phase Consulting Co.: Additional Environmental Site Assessment, Midway Car Rental, 2902 Wilshire Boulevard, Los Angeles, California, dated August 25, 2015. See Appendix D of this IS/MND.*

²¹ *EP Associates, Phase I Environmental Site Assessment, 16-Lot Commercial Property, 2926 and 2950 Wilshire Boulevard, Los Angeles, California, dated April 18, 2008. See Appendix D of this IS/MND.*

Project Site is within a Methane Zone, prior to the issuance of a building permit the Project Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval. Implementation of this regulatory compliance measure ensures that any potential impacts relating to the accidental release of methane would be mitigated to a less than significant level.

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?

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 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. 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 of exposure to the health hazard.

There are three schools that are within approximately one-quarter mile from the Project Site:

- Rise Kohyang Middle School, located at 3020 Wilshire Boulevard (approximately 450 feet west of the Project Site);
- Los Angeles Academy of Arts and Enterprise, located at 600 S. La Fayette Park Place (approximately 0.10 mile northeast of the Project Site); and
- Larchmont Charter School, located at 2108 W. 6th Street (approximately 0.15 mile northeast of the Project Site).

The Proposed Project has the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period. The nearest school, Rise Kohyang Middle School, located within 450 feet west of the Project Site school has the potential to experience construction impacts related to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, the Proposed Project would implement Mitigation Measure HAZ-1, below, to reduce the Project's impacts upon the nearby school facility. Furthermore, the haul route for the project would be southbound on Hoover Street to the eastbound I-10 Freeway, to the northbound I-110 Freeway, to the northbound SR-170 Freeway, to the northbound I-5 Freeway to the Sunshine Canyon

Landfill. This proposed haul route would not pass by the aforementioned schools. Therefore, implementation of Mitigation Measures HAZ-1 would reduce any construction impacts related to nearby schools to less than significant levels.

Mitigation Measures:

HAZ-1 Construction Activity Near Schools

- The Applicant and contractors shall maintain ongoing contact with administrator of Rise Kohyang Middle School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)-342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Wilshire Boulevard, adjacent to the school.
- Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Wilshire Boulevard, adjacent to the school, during school hours.

HAZ-2 Schools affected by Haul Route

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

During operation, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housing keeping and janitorial purposes would be present at the Project Site and use of these substances would comply with State Health Codes and Regulations. Therefore, the Proposed Project's impacts associated with hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste during operation would be less than significant.

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?

No 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. Based on the data contained in the Phase I ESA, EP Associates concluded the Project Site was not listed in any government database reviewed by EDR. Therefore, development of the Proposed Project would not create a significant hazard to the public or the environment, and no impact would occur.

- 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 nearest public airport to the Project Site is the Bob Hope Airport located approximately 10.3 miles north of the Project Site. At this distance, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not 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 not located within the vicinity of a private airstrip. 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?**

Less Than Significant Impact. 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. The Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.^{22,23} Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be 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. Furthermore, Mitigation Measures T-1 and T-2, as discussed in

²² Los Angeles County Department of Public Works, *City of Los Angeles Central Area Disaster Route Map*, August 13, 2008.

²³ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles*, April 1995.

Section XVI(a), recommends that a Construction Traffic Management Plan and a Construction Worker Parking Plan be submitted to the Department of Transportation (DOT) for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall include, but are not limited to, the following measures relevant to an adopted emergency response plan or emergency evacuation plan:

- As parking lane and sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic and pedestrians around any such closures.
- If temporary travel lane closures are required, schedule closures to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. If temporary travel lane closures are anticipated, a worksite traffic control plan, approved by the City of Los Angeles, will be implemented to route traffic around any such lane closures.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

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 Proposed Project's construction trip traffic would be a fraction of the operational traffic and it is not anticipated to contribute to a significant increase in the overall congestion in the Project vicinity. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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 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).²⁴ 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 91 related projects has the potential to increase to some degree the risks associated with the use and potential

²⁴ City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 24, 2016.

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.

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 the Standard Urban Storm Water Mitigation Plan (SUSMP) and the Stormwater Low Impact Development (LID) Ordinance (No. 181899) requirements to reduce potential water quality impacts.

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. As required under the National Pollution Discharge Elimination System (NPDES), the Project Applicants are responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES stormwater program requirements are to: 1) effectively prohibit non-stormwater discharges; and 2) reduce the discharge of pollutants from stormwater conveyance systems to the Maximum Extent Practicable ("MEP" statutory standard). 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. Furthermore, the implementation of the code required SWPPP would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

Currently, an existing storm drain that conveys storm water in a southerly direction occupies the Project Site. The existing storm drain on the Project Site is 63 inches in diameter and owned and operated by the City of Los Angeles to convey storm water runoff from the Lafayette Park area. As such, any stormwater runoff from the Project Site would be directed to the existing storm drain occupying the Project Site. The Proposed Project would relocate the existing storm drain to either 1) at the end of the original 63-inch diameter drain two ring circular brick culvert under Wilshire Boulevard to realign the new 63-inch storm drain to the center of a proposed 15-foot wide storm drain easement located parallel and adjacent to the westerly property line within the Project Site and continues southerly within the 15-foot easement, to a point in the southwesterly corner of the site, where the new alignment intercepts with the existing storm drain; or 2) at approximately the centerline of Wilshire Boulevard, approximately 72 feet east of the intersection with Commonwealth Avenue, the existing storm drain will be cut and a new storm drain would join the existing pipe with a curved section (with a 45-foot radius) that will align the proposed storm drain in a westerly direction parallel to Wilshire Boulevard and another 45-foot radius curved pipe that will align the proposed storm drain to the center of the proposed 15-foot storm drain easement located parallel and adjacent to the westerly property line with the Project Site and continue southerly within the easement to the southwesterly corner of the site to intercept with the existing storm drain.²⁵

The Project Site is also currently developed with a surface parking lot and two one-story commercial 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 the existing storm drain and other adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. The Proposed Project would continue to generate surface water runoff. Potential impacts to surface water runoff would be mitigated to a less than significant level by incorporating stormwater pollution control measures. 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

²⁵ *Psomas, Preliminary Report for the Relocation of a 63 Inch Storm Drain Located within the Development Site of Residential and Commercial Development Southwest Corner of Wilshire Boulevard and Hoover Street, City of Los Angeles, California, dated May 15, 2006. See Appendix G of this IS/MND.*

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 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.²⁶

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.²⁷ Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.²⁸

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 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is

²⁶ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

²⁷ *City of Los Angeles Ordinance No. 183,833, 2015.*

²⁸ *Ibid.*

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 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.²⁹

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)?**

No 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 Section VIII(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. The Seismic Hazard Zone Report (SHZR) for the Hollywood 7½-Minute Quadrangle indicates the historic highest groundwater level in the vicinity of the Project Site was 18 to 20 feet below the ground surface. The Proposed Project should not cause the depletion of the groundwater supplies or the interference of groundwater recharge, since the Project Site is currently 100 percent impervious. The Proposed Project would continue to be supplied with potable water by the LADWP. Further, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. Thus, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with

²⁹ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

groundwater recharge, and no impact would occur.

- 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 Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project Site is 100 percent impervious. Currently, an existing storm drain that conveys storm water in a southerly direction occupies the Project Site. As discussed in Section IX(a), while the Proposed Project would relocate the existing storm drain, the Proposed Project would not substantially alter the existing drainage pattern of the site or area. 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. Currently, an existing storm drain that conveys storm water in a southerly direction occupies the Project Site. As discussed in Section IX(a), while the Proposed Project would relocate the existing storm drain, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Therefore, as the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site, no impact would occur. In addition, the Proposed Project would comply with LAMC Section 64.70, and 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 (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. A significant impact may occur if 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 nearly 100 percent of surface water runoff is directed to the existing storm drain on the Project Site as well as adjacent street storm drains. Currently, an existing storm drain that conveys storm water in a southerly direction occupies the Project Site. As discussed in Section IX(a), while the Proposed Project would relocate the existing storm drain, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage pattern. Runoff from the Project Site currently is and would continue to be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy stormwater retention will be required as part of the Low Impact Development (LID) Ordinance / SUSMP implementation features (despite no increase in imperviousness of the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance standards and retain or treat the first $\frac{3}{4}$ -inch of rainfall in a 24-hour period, which will reduce the Proposed Project's impact to the stormwater infrastructure. Therefore, 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. Further, the Proposed Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control, which would ensure impacts are 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. 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?

Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if the 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 located in two zones, with the western portion of the Project Site located in a 100-year flood hazard area. The eastern portion of the Project Site is designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain. However, the western portion of the Project Site is designated as Zone AH, which signifies that the area is subject to flood depths of 1 to 3 feet (usually areas of ponding) and is

subject to inundation by the 1% annual chance flood.³⁰ The Flood Insurance Rate Map (FIRM) designates the Project Site's Base Flood Elevation (BFE) as 242 feet above sea level. Therefore, all building perimeter access openings such as driveway entries, doors, windows, elevated doors, and air vents must be at or above 243 feet above sea level (or 1 foot above BFE) before dropping to a lower level. The Proposed Project would comply with all Federal requirements for construction within this flood zone designation. Furthermore, implementation of mitigation measure HWQ-1, below, would reduce impacts from the Proposed Project related to placing housing within a 100-year flood hazard area to less than significant.

Mitigation Measure:

HWQ-1 Flooding/Tidal Waves

- The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA), the western portion of the Project Site is located in a 100-year flood hazard area. The Project Site is located in two zones. The eastern portion of the Project Site is designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain. However, the western portion of the Project Site is designated as Zone AH, which signifies that the area is subject to flood depths of 1 to 3 feet (usually areas of ponding) and is subject to inundation by the 1% annual chance flood.³¹ 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. As discussed in Section IX(g), the Project would comply with all Federal requirements for construction within this flood zone designation. Furthermore, implementation of Mitigation Measure HWQ-1, above, would further reduce impacts from the Proposed Project related to placing structures which would impede or redirect flood flows to less than significant levels.

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 inundation. Review of the City of Los Angeles General Plan Safety Element, the

³⁰ Federal Emergency Management Agency (FEMA), *Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Map number 06037C1620F, September 26, 2008.*

³¹ Federal Emergency Management Agency (FEMA), *Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Map number 06037C1620F, September 26, 2008.*

Proposed Project does not lie within an inundation or tsunami hazard area.³² 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. Furthermore, implementation of Mitigation Measure HWQ-1, above, would further reduce impacts from the Proposed Project related exposure of people or structures to a significant risk of loss, injury or death involving flooding to less than significant. Therefore, no impact would occur.

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. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Review of the City of Los Angeles General Plan Safety Element, the Proposed Project does not lie within an inundation or tsunami hazard area.³³

Additionally, the Project Site is not located within a liquefaction or earthquake-induced landslide zone, as designated by the Hollywood Quadrangle Seismic Hazard Zones Map. Thus, the occurrence of mudflows on the Site is considered remote. Therefore, the Project Site is not subject to slope instability, tsunamis, and seiches. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in a highly developed area within Los Angeles. As discussed above, the Project Site and the surrounding areas are served by the existing 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, little if any additional cumulative runoff is expected from the Proposed Project and the related project sites, since Los Angeles is highly developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. 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. Therefore, cumulative water quality impacts would be less than significant.

³² *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

³³ *Ibid.*

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 Wilshire community and is consistent with the existing physical arrangement of the properties within the vicinity of the Site. 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 proposes the development of a 23-story mixed-use building with a maximum of 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. The Proposed Project would also include a 7-story podium with a 6-story above grade parking garage. Of the 644 total residential units, 437 residential units would be located in the 23-story residential tower and 207 residential units would be located in 7 stories that front Wilshire Boulevard and 4 stories that front Hoover Street and Sunset Place. The 207 residential units would wrap around the 7-story podium and the 6 above grade parking levels. The Project Site is zoned C4-2 with a land use designation of Regional Center Commercial. The Project Site is located within the Wilshire Community Plan ("Community Plan") area of the City of Los Angeles. More specifically, the Project Site is located within the Wilshire Center Regional Commercial Center area of the Community Plan. As such, development on the Project Site is further defined by the Redevelopment Plan for the Wilshire Center / Koreatown Redevelopment Project ("Redevelopment Plan"). Additionally, the Project Site is located within the Metro Rail Project Area, the Adaptive Reuse Incentive Area, Wilshire Center Business Improvement District, and Enterprise Zone (the Employment and Economic Incentive Program Area). The Proposed Project has been designed to comply with all applicable General Plan, zoning designations, requirements of the LAMC for the Project area.

Regional Plans***SCAQMD Air Quality Management Plan***

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 air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With approval of the TFAR, the Proposed Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Air quality impacts by the Proposed Project and consistency of the Project with the AQMP is analyzed in greater detail in Section III (Air Quality) of this IS/MND. Furthermore, as noted in Checklist Question II(b), Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Project. Therefore, the Project would be consistent with the AQMP.

Congestion Management Plan

The 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. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Project Traffic Study was prepared in accordance with the County CMP and 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 several elements including: Health and Wellness, Air Quality, Conservation, Housing, Noise, Open Space, Public Facilities and Services, Safety, Mobility and Economic Development. Additionally the General Plan includes the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas.

Those elements that would be most applicable to the Proposed Project are the Housing Element, the

Mobility Element and the Land Use Element. Table III-9, below, provides a project consistency analysis with the applicable goals of the Housing and Mobility Elements of the General Plan Framework. Consistency with the Land Use Element is further analyzed under the Wilshire Community Plan for Residential and Commercial Land Uses presented in Table III-9. As shown in Table III-9, the Proposed Project is generally consistent with the applicable elements of the General Plan.

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

City of Los Angeles General Plan Goals	Project Consistency Analysis
<i>Housing Element Goals</i>	
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.	The Proposed Project would increase the housing stock in the Wilshire Center Regional Commercial Center area of Los Angeles by providing safe, attractive, and centrally located studio, one-bedroom, and two-bedroom residential units. The 644 residential units included in the Proposed Project would be available to all persons, including existing Wilshire Center Regional Commercial Center employees and residents, without discrimination. Thus, the Project is contributing to the range of housing choices available to Los Angeles employees and residents and is therefore consistent with this goal.
2. A City in which housing helps to create safe, livable and sustainable neighborhoods.	The Proposed Project would redevelop an underutilized site that is currently used as a surface parking lot and two one-story commercial buildings. The Proposed Project would be attractively designed and landscaped. Compliance with the regulatory compliance measures discussed in Section I (Aesthetics), above, would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Project would eliminate and prevent the spread of blight and deterioration by redeveloping an underutilized site. Therefore, the Proposed Project would be consistent with this goal.
3. A City where there are housing opportunities for all without discrimination.	The Project's residential units would be available at market rate. The Project is increasing the housing choices available in the Wilshire Center Regional Commercial Center area. The Project can attract new, economically, and ethnically diverse households, and as such would be consistent with this goal.
<i>Mobility Element Key Goals</i>	
1. Safety First: Crashes, speed, protection, security, safety education, and enforcement.	The Proposed Project would not include unusual or hazardous design features. Current vehicular access to the Project Site is provided by one driveway along Wilshire Boulevard. The Proposed Project would include four driveways located on Commonwealth Avenue and Wilshire Boulevard, Hoover Street, and two driveways on Sunset Place. The Traffic Study analysis prepared for the Proposed Project (see Appendix F of this IS/MND) determined the driveway locations are projected to operate at acceptable levels of service (LOS). 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

City of Los Angeles General Plan Goals	Project Consistency Analysis
	vehicles. As such, the Proposed Project would not substantially increase hazards due to design features, or incompatible uses, and would be therefore be consistent with this goal.
2. World Class Infrastructure: Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.	This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project’s location near mass transit, its 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 be consistent with this goal.
3. Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, community connections.	The Project Site is located in a highly urbanized area of the Wilshire Center Regional Commercial Center 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 ½ mile of an existing rail transit station, the Wilshire/Vermont Metro Redline Station. The Project Site is also located within ½ mile of numerous bus routes. 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.	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 (see Appendix F of this IS/MND) was determined in conjunction with the City of Los Angeles Department of Transportation (LADOT) and conducted in accordance with the LADOT Traffic Study Guidelines.
5. Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.	The Project is an infill development in a Transit Priority Area. 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 would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Proposed Project is 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, 2016.	

Wilshire Center Regional Commercial Center

As mentioned above, the Project Site is located in the Wilshire Center Regional Commercial Center, which is established by the General Plan Framework and further defined in the Community Plan. Four areas within the Wilshire Community Plan area are designated as Regional Commercial Centers and consist of roughly 270 acres of land within the Community Plan area. These areas include the Wilshire Center, Miracle Mile Center, Beverly Center-Cedars Sinai, and the Koreatown Center. The Wilshire Center is approximately 100 acres in size and is generally bounded by 3rd Street to the north, Hoover Street to the east, 8th Street to the south, and Wilton Place to the West. The Wilshire Center includes the

Metro Red Line and Purple Line subway stations located along Wilshire Boulevard. The Community Plan outlines an overarching goal, objectives, and policies for commercially-designated lands within the Community Plan area. The overarching goal for all of the Regional Commercial Centers is to “encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire Community through well-designed safe and accessible areas, while preserving historic and cultural character.”

Wilshire Community Plan

All development activity on-site is subject to the land use regulations of the Wilshire Community Plan. The Community Plan goals and objectives include enhancing the positive characteristics of residential neighborhoods; improving the function, design, and economic vitality of the commercial areas; preserving and enhancing the positive characteristics of existing land uses; maximizing development opportunities around existing and future transit systems; preserving and strengthening commercial development; and improving the quality of the built environment.³⁴ As described in the Community Plan, the area contains a pattern of low to medium density residential uses interspersed with areas of higher density residential land uses and long narrow corridors of commercial activity. The plan area east of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center.³⁵ The Proposed Project, which would provide a mixed-use residential/retail development in an underutilized area of the Wilshire Center Regional Community Center, 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 a 23-story mixed-use residential and commercial building. The Proposed Project would provide a maximum of 644 dwelling units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space, with a total of 1,124 automobile parking spaces and 724 bicycle spaces. The Proposed Project would provide a variety of on-site amenities, which may include but is not limited to, an outdoor fire pit / gathering area, private outdoor patio areas for residential units, outdoor game area, indoor party room, dog park area, barbeque area, spa and downtown viewing deck, cabanas, indoor yoga and fitness area, and pool located on Level 7 (Amenity Podium). A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the Wilshire Community Plan for Residential and Commercial Land Uses is presented in Table III-10, below.

³⁴ *City of Los Angeles Department of City Planning, Wilshire Community Plan, 2001, p. II-3.*

³⁵ *City of Los Angeles Department of City Planning, Wilshire Community Plan, 2001, p. I-1.*

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

Objective / Policy	Project Consistency Analysis
Residential	
Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.	The Proposed Project would increase the housing stock in the Wilshire Community Plan area with safe, attractive, and centrally located studio, one-bedroom, and two-bedroom residential units. The units would be available to all persons, including existing employees and residents, without discrimination. Thus, the Project would meet the diverse economic and physical needs of the existing and expected new residents.
Policy 1-1.3: Provide for adequate Multiple Family residential development.	The Proposed Project would include development of 644 safe, attractive, and centrally located residential units. The Project is increasing the multiple family residential housing choices available in the Wilshire Community Plan area. Thus, the Proposed Project is consistent with this policy.
Policy 1-1.4: Provide for housing along mixed-use boulevards where appropriate.	The Proposed Project would include development of 644 residential units. The Proposed Project would be consistent with the surrounding neighborhood by adding a mixed-use building to an area that is characterized by mixed-use development. Therefore, the Proposed Project would be consistent with this policy.
Objective 1-2: Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	The Project's dwelling units would be available at market rate. The Proposed Project is increasing the housing choices available in Wilshire Community Plan area. The Project can attract new, economically, and ethnically diverse households, which is a goal of the General Plan and Community Plan. Thus, the Proposed Project supports this objective.
Policy 1-2.1: Encourage higher density residential uses near major public transportation centers.	The Project Site is located in a highly urbanized area of the Wilshire Community Plan area and is adjacent to existing residential uses. The Project Site is located approximately 0.3 mile east of an existing rail transit station, the Wilshire/Vermont Metro Redline Station. The Project Site is also located within ½ mile of numerous bus routes. The location of the Proposed Project encourages higher density residential uses near major public transportation centers.
Objective 1-3: Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	The Project Site is currently used as a surface parking lot and two one-story commercial buildings. As such, the Proposed Project would not destroy or demolish residential uses. Additionally, the Proposed Project, which includes residential uses, would be designed and developed with guidance of City Planning Staff, 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 to be consistent with the residential character and integrity of existing residential neighborhoods.
Policy 1-3.1: Promote architectural compatibility and landscaping for new multiple family residential development to protect the character and scale of existing residential neighborhoods.	The Proposed Project would redevelop an underutilized site that is currently used as a surface parking lot and two one-story commercial buildings. The Proposed Project would be attractively designed and landscaped with guidance of City

Objective / Policy	Project Consistency Analysis
	Planning Staff, 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 to protect the architectural compatibility, character, and scale of existing residential neighborhoods.
Policy 1-3.4: Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.	The Proposed Project would include four driveways located on Commonwealth Avenue and Wilshire Boulevard, Hoover Street, and two driveways on Sunset Place. As discussed in Section XVI (Transportation and Traffic), the Proposed Project would result in less than significant impacts related to transportation and traffic. Therefore, the Proposed Project would not encourage spillover traffic on local residential streets and would be consistent with this policy.
Objective 1-4: Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.	The Proposed Project would provide 644 additional residential units to the Wilshire Center Regional Commercial Center and all residential units will be available at market rate. Additionally, the Project Site is located approximately 0.3 mile east of an existing rail transit station, the Wilshire/Vermont Metro Redline Station. The Project Site is also located within ½ mile of numerous bus routes. Therefore, the Proposed Project would increase accessibility to more population segments and supports this objective.
Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	The Proposed Project would increase the housing stock in the Wilshire Community Plan area with safe, attractive, and centrally located studio, one-bedroom, and two-bedroom residential units. The Project's residential units would be available at market rate and would promote greater individual choice in the type, quality, price and location of housing.
Policy 1-4.2: Ensure that new housing opportunities minimize displacement of residents.	The Proposed Project would add a total of 644 residential units to the Wilshire Community Plan area. The Project Site is currently developed with a surface parking lot and two one-story commercial buildings. Therefore, the Proposed Project would not displace residents. As such, the Proposed Project would be consistent with this policy.
Policy 1-4.3: Encourage multiple family residential and mixed use development in commercial zones.	The Project Site is zoned C4-2. The Proposed Project is consistent with the surrounding neighborhood by adding a mixed-use building to an area that is characterized by mixed-use development in a commercial zone. Therefore, the Project is consistent with this policy.
Commercial	
Objective 2-1: Preserve and strengthen viable commercial development and provide additional opportunities for new commercial development and services within existing commercial areas.	The Project Site is zoned C4-2. The Proposed Project includes up to 15,500 square feet of ground-floor commercial retail uses. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities in the Wilshire Center Regional Commercial Center. The Project would provide new housing, which would provide new foot traffic to support existing and new businesses in this high-density mixed-use neighborhood. The Proposed Project would foster new business and employment opportunities and potential customers, which

Objective / Policy	Project Consistency Analysis
	would support this objective.
Policy 2-1.1: New commercial uses should be located in existing established commercial areas or shopping centers.	The Proposed Project would include up to 15,500 square feet of ground-floor commercial space on an existing site zoned as C4-2. The Project Site is also located in the Wilshire Center Regional Commercial Center. Therefore, the Proposed Project is consistent with this policy.
Policy 2-1.2: Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.	The Project Site is located in the Wilshire Center Regional Commercial Center of the Community Plan area. The Proposed Project involves the construction of a 23-story mixed-use building, which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. The Proposed Project would be developed with guidance of City Planning Staff, 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 to adhere to the community plan land use designations. Therefore, the Proposed Project would be consistent with this policy.
Objective 2-2: Promote distinctive commercial districts and pedestrian-oriented areas.	The Proposed Project involves the construction of a 23-story mixed-use building, which includes 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space in the Wilshire Center Regional Commercial Center. The Project Site is in walking distance from many services, employment opportunities, and retail spaces. Pedestrian egress and ingress to the Proposed Project's residential component would be provided via the lobby entrance located on Sunset Place. Pedestrian access to the commercial component would be from the Wilshire Boulevard and Hoover Street frontages. Additionally, the Project Site is located in a Transit Priority Area and is in close proximity to the Wilshire/Vermont Metro Redline Station (0.3 miles) and numerous bus routes.
Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.	The Proposed Project includes the development of a 23-story mixed-use building with 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. Pedestrian egress and ingress to the Proposed Project's residential component would be provided via the lobby entrance located on Sunset Place. Pedestrian access to the commercial component would be from the Wilshire Boulevard and Hoover Street frontages. The Project Site is in walking distance from many services, employment opportunities, retail spaces, the Wilshire/Vermont Metro Redline Station, and numerous bus routes. Therefore, the Project is consistent with this policy.
Policy 2-2.2: Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.	The Proposed Project includes the development of a 23-story mixed-use building with 644 residential units, 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. The 10,000 square feet of neighborhood-serving retail space may incorporate facilities beneficial to the community.
Policy 2-2.3: Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in	The Proposed Project involves the construction of a mixed-use building with 644 residential units, 10,000 square feet of

Objective / Policy	Project Consistency Analysis
the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.	neighborhood-serving retail space, and 5,500 square feet of restaurant space.
Objective 2-3: Enhance the visual appearance and appeal of commercial districts.	The Proposed Project would redevelop an underutilized site that is currently used as a surface parking lot and two one-story commercial buildings. The Proposed Project would be attractively designed and landscaped with guidance of City Planning Staff, 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 to enhance the visual appearance and appeal of the Wilshire Center Regional Commercial Center.
Policy 2-3.1: Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.	The Proposed Project would be designed and developed with guidance of City Planning Staff, 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 to improve streetscape identity and character and be compatible with the scale of adjacent neighborhoods. Thus, the Proposed Project would be consistent with this policy.
<i>Source: City of Los Angeles, Wilshire Community Plan, Land Use Plan Policies and Programs Parker Environmental Consultants, 2016.</i>	

The Wilshire Community Plan addresses planning and land use issues and opportunities in various sectors, such as residential, industrial, commercial, transportation, among others. The Wilshire Community Plan projected a population of 336,344 persons and 134,300 dwelling units by 2010 within the Community Plan area.³⁶ The 2010 United States Census shows that the Wilshire Community Plan area had an actual population of 278,968 persons and 126,091 dwelling units in 2010.³⁷ The 2010 Census data shows that the actual population and housing units in the Wilshire Community Plan area in 2010 was lower than what was projected. Nevertheless, as discussed in Section XIII (Population and Housing), the Proposed Project is 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 Wilshire Community Plan. Therefore, impacts related to the consistency with the applicable land use and planning

³⁶ City of Los Angeles Department of City Planning, *Wilshire Community Plan, Plan Population and Dwelling Unit Capacity Table*.

³⁷ *The Wilshire Community Plan Area contains the following tracts: 1923, 1924.10, 1924.20, 1925.10, 1925.20, 1926.10, 1926.20, 1927, 1945, 2110, 2111.20, 2111.21, 2111.22, 2112.01, 2112.02, 2113.10, 2113.20, 2114.10, 2114.20, 2115, 2117.01, 2117.03, 2117.04, 2118.02, 2118.03, 2118.04, 2119.10, 2119.21, 2119.22, 2121.01, 2121.02, 2122.02, 2122.03, 2122.04, 2123.03, 2123.04, 2123.05, 2123.06, 2124.10, 2124.20, 2125.01, 2125.02, 2126.10, 2126.20, 2127.01, 2127.02, 2128, 2129, 2131, 2132.01, 2132.01, 2133.10, 2133.20, 2134.04, 2134.02, 2140, 2141, 2144, 2145.01, 2145.01, 2145.02, 2145.03, 2146, 2147, 2148, 2149.01, 2149.02, 2151.01, 2151.02, 2161, 2162, 2163, 2164.01, 2164.02, 2167, 2168, 2169, 2170.01, 2170.02, 2171, 2172. The population and dwelling units were calculated by summing the individual tracts together. Source: United States Census Bureau, 2010 Census Interactive Population Map, website: <http://www.census.gov/2010census/popmap/>, accessed September 2015.*

policies in the Wilshire Community Plan would be less than significant.

Redevelopment Plan for the Wilshire Center/Koreatown Redevelopment Project

The Proposed Project is located within the Wilshire Center/Koreatown 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 Wilshire Center/Koreatown Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in December 1995 by the CRA/LA and remains effective until December 2025. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the Wilshire Center/Koreatown area. Table III-11, below, provides a detailed analysis of the consistency of the Proposed Project with the applicable goals of the Redevelopment Plan.

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

Goals	Project Consistency Analysis
1. Eliminate and prevent the spread of blight and deterioration in accordance with the Redevelopment Plan, the City of Los Angeles Wilshire District Plan and the Agency's Annual Work Program.	The Proposed Project would redevelop an underutilized site that is currently occupied by a surface parking lot and two commercial buildings. The Proposed Project would be attractively designed and landscaped with guidance of City Planning Staff, 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. Compliance with the regulatory compliance measures discussed in Section I (Aesthetics), above, 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 in accordance with the Plan. The Project is consistent with the goal.
2. Encourage the involvement and participation of property owners, residents, business persons, religious and community organizations to meet the diverse needs.	This objective is directed toward City goals and is not specifically applicable to the Proposed Project. The Proposed Project will be designed and developed with the guidance of City Planning Staff, 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 goal.
3. Promote the economic, social, educational and cultural and physical well-being through the revitalization of the residential, commercial and industrial areas.	The Proposed Project's mixed-use design locates high-density housing near many employment opportunities. Additionally, the ground-floor commercial element provides additional employment opportunities in the Wilshire Center Regional Commercial Center. The Project's residential units and employment opportunities will be available to all ethnic, social, and economic groups without discrimination to promote economic, social, educational, cultural, and physical well-being. As such, the Project would be consistent with this goal.
4. Promote the livability of the Project Area as a cohesive and sustainable neighborhood.	The Proposed Project would be designed to be visually compatible with the surrounding buildings and character of the

Goals	Project Consistency Analysis
	neighborhood. Additionally, the design of the proposed building will be guided by the City Planning Staff and other necessary City departments and in accordance with plans and design guidelines that have jurisdiction over the Project Site. All building plans will further require approval from the City. Implementation of the regulatory code compliance measures identified in Section I(c), above, will further ensure that the building promotes the livability of the Project Area during the Project's construction and operation.
5. Encourage the development of housing in a wide range of types, prices, rent levels and ownership options.	The Proposed Project would increase the housing stock in the Wilshire Center Regional Commercial Center with safe, attractive, and centrally located studio, one-bedroom, and two-bedroom residential units. The units would be available to all persons, including existing employees and residents, without discrimination and at market rate. Thus, the Project would meet the diverse economic and physical needs of the existing and expected new residents. Therefore, the Proposed Project would be consistent with this objective.
6. Enhance the safety and security of residents, businesses, employees and visitors.	As discussed in Section XIV (Public Services), 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 Proposed Project would enhance the safety and security of residents, businesses, employees, and visitors.
7. Encourage the employment of Project Area residents.	The Proposed Project would be consistent with this goal, as it provides 15,500 square feet of ground-floor commercial space and will introduce new employment opportunities into the area. As such, the Project would be consistent with this goal.
11. Provide additional open space and recreation activities and facilities.	The Proposed Project would include a total of 64,440 square feet of open space. The total amount of open space required with a 10% reduction allowed per LAMC Section 12.21.G.3 is approximately 64,440 square feet. As part of the open space requirements, the residential component of the Project includes planting trees at a rate of one tree for every four dwelling units. 161 trees are proposed on-site and 9,000 square feet of planted open space, which is consistent with LAMC requirements.
13. Promote and encourage artists, crafts people and entertainers to live and work within the Project Area.	The Proposed Project would increase the housing stock in the Wilshire Community Plan area with safe, attractive, and centrally located studio, one-bedroom, and two-bedroom residential units. The units would be available to all persons, including artists, crafts people and entertainers, without discrimination and would be at market rate. Additionally, the Proposed Project would include 15,500 square feet of ground floor commercial space, which could include employment for artists, crafts people and entertainers. Therefore, the Proposed Project would promote and encourage artists, crafts people and entertainers to live and work within the Project Area.
14. Develop a cultural and entertainment district to establish a regional identity for a significant commercial, retail, and residential center.	Although this goal pertains to the development of a cultural and entertainment district, the Proposed Project would add 644 residential units 10,000 square feet of neighborhood-serving retail space, and 5,500 square feet of restaurant space. The

Goals	Project Consistency Analysis
	mixed-uses proposed by the Project would help to establish a regional identity. Thus, the Proposed Project would be consistent with this goal.
17. Coordinate the revitalization efforts and take advantage of other programs in the City of Los Angeles and other local, state and federal agencies.	The Proposed Project would be designed and developed with the guidance of City Planning Staff, 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 goal.
18. Promote and encourage the development of bicycle-friendly streets and a full range of amenities, where feasible.	Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 72 short-term bicycle parking spaces and 652 long-term bicycle parking spaces, for a total of 724 bicycle parking spaces. The Project proposes to provide 724 spaces and would be consistent with this goal.
<p><i>Notes: 1. "Plan" used within this table means the Wilshire Center/Koreatown Redevelopment Plan.</i> <i>Source: City of Los Angeles, Redevelopment Plan For the Wilshire Center/Koreatown Redevelopment Project (Ordinance No. 170806), December 13, 1995</i> <i>Parker Environmental Consultants, 2016.</i></p>	

The Proposed Project would be consistent with the overall goals of the Redevelopment Plan, as discussed above. The Proposed Project would revitalize an underutilized lot with the development of a 23-story mixed-use building with ground-floor commercial space and residential units. The Project’s land uses are consistent with the surrounding neighborhood that is highly characterized by mixed-use buildings. Additionally, the Project is consistent with the Project Site’s the zoning (C4-2) 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 64,440 square feet of common and private open space. The Proposed Project’s open space would be attractively landscaped. The Proposed Project would include amenities, which are appropriate to the size and type of land uses proposed. The Redevelopment Plan refers to the Community Redevelopment Agency of the City of Los Angeles, California for guidance in building design. The Proposed Project is visually consistent and compatible with the surrounding buildings by providing no setbacks from the public rights-of-way along Wilshire Boulevard, S. Hoover Street, and Sunset Place. The Proposed Project would meet the design and location criteria required by the successor agency to the CRA/LA. Therefore, the Proposed Project would be consistent with the Redevelopment Plan’s criteria for mixed-use development and overall objectives.

Los Angeles State Enterprise Zone

Enterprise Zones (EZs) are specific geographic areas designated by City Council resolution, and have received approval from the California Department of Commerce under either the Enterprise Zone Act Program or Employment And Economic Incentive Act Program.³⁸ The Proposed Project is located in the

³⁸ *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 24, 2016.*

Los Angeles State Enterprise Zone or the ZI No. 2374 Enterprise Zone / Employment and Economic Incentive Program Area (EZ). EZs are specific geographic areas under the Enterprise Zone Act Program or Employment and Economic Incentive Act Program with the goal to “provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services.”³⁹ Under the Los Angeles State Enterprise Zone, two special provisions are applicable to plan check: Parking Standards and Height. Parking Standards, described in Section 12.21A4(x)(3) of the LAMC, states projects within EZs may utilize a lower parking ratio (two parking spaces for every one thousand square feet of combined gross floor area) for certain land uses, including retail and other related uses, in order to increase the buildable area of a parcel in older areas of the City where parcels are small. The height provision, outlined in Section 12.21.4 of the LAMC, allows special height districts in EZs through approval of a Zone Change. The Proposed Project is zoned C4-2. Height District No. 2 does not specify a building height limit and allows a maximum total floor area of six times the buildable area of the lot. The Proposed Project would provide 1,124 parking spaces for a total 657,514 total proposed buildable square footage. Thus, the Proposed Project is in compliance with the provisions in the Los Angeles State Enterprise Zone.

Adaptive Reuse Incentive Area

The Project Site is also within an Adaptive Reuse Incentive Area (Ordinance No. 175,038). Adaptive reuse is defined as any change of an existing non-residential use to new dwelling units, guest rooms, or joint living and working quarters in all or in any portion of an eligible building. The Proposed Project would include the demolition of the existing surface parking lot, two one-story commercial buildings, and the billboard to allow for the development and operation of a 23-story mixed use residential and commercial building. As such, the Proposed Project would not be providing dwelling units within existing non-residential buildings. The Proposed Project does not anticipate any adaptive reuse of the existing buildings. Thus, the permissions of the Adaptive Reuse Ordinance are not applicable to the Proposed Project.

Transit Priority Area (Zoning Information 2452)

On September 2013, the Senate Bill (SB) 743 was signed into law, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. SB 743 states that project’s aesthetics and parking impacts shall not be considered a significant impact on the environment if: (1) the Project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. SB 743 is further discussed in Section I (Aesthetics). Proposed Project is a mixed-use residential project located on an infill site within 0.3 miles of the Metro Redline Station. As such, the

³⁹ *City of Los Angeles, Community Development Department, ZI No. 2374 Enterprise Zone / Employment and Economic Incentive Program Area (EZ), website: <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>, accessed March 2016.*

Project Site is within a Transit Priority Area as defined by CEQA.⁴⁰ Therefore, the Proposed Project is eligible for parking reductions and other incentives offered for transit oriented district projects.

Los Angeles Municipal Code

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 Los Angeles Municipal Code (LAMC). The General Plan land use designation for the Project Site is Regional Center Commercial and the zoning designation is C4-2, which allows for residential and commercial retail land uses. The Proposed Project would be comprised of multi-family residential uses and commercial uses. Residential uses are permitted on lots zoned for C4 uses that are located within the Wilshire CPA and the Wilshire Center/Koreatown Redevelopment Project Area. Additionally, per LAMC Section 12.22 A 18, the lot area requirements of the R5 Zone applies to all portions of buildings erected and used for residential purposes in the C4 Zone with a Regional Center Commercial land use designation. Per the LAMC (LAMC Section 12.14), no yard requirements apply for lots in the C4 Zone. The Proposed Project would include no setbacks, which is compatible with surrounding buildings zoned for commercial use and generally occupy entire parcels with little to no setbacks. Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Building Height

The Project Site is zoned C4-2 with the land use designation of Regional Center Commercial. The corresponding zones for Regional Center Commercial are the CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3 and RAS4 Zones. Height District No. 2 does not specify a building height limit. However, as the Project Site is located adjacent to an OS Zone (the property to the east and the properties to the north of the Project Site are zoned OS-1XL), the Proposed Project would be expected to comply with LAMC Section 12.21.1A.10, which limits the portions of building heights on a C zoned lot when located within the

following distances from a lot classified in the RW1 Zone or a more restrictive zone, including the OS Zone:

<u>Distance</u>	<u>Height</u>
0 to 49 feet	25 feet
50 to 99 feet	33 feet
100 to 199 feet	61 feet

The Proposed Project includes the development of a mixed-use residential and commercial building with four distinguishing breaks in height and step-backs. Thus, the proposed 23-story mixed-use building will have a maximum height of approximately 268.5 feet above grade with a break in height at approximately

⁴⁰ City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 24, 2016.

215 feet above grade (Level 21). The proposed mixed-use building would also include an approximately 64 foot Level 7 podium (Amenity Podium) and an approximately 53 foot 6-story parking garage. The proposed mixed-use building would also have an approximately 81-foot transitional height limit. The residential tower would be located on the southern portion of the Project Site farther from the OS Zone, allowing for a higher building height. Therefore, the Proposed Project would be consistent with the LAMC building height requirements.

Floor Area

Per the LAMC, the Project Site's C4-2 zone designation restricts the allowable floor area ratio (FAR) to 6 times the buildable area of the site. The Project Site occupies 128,994 square feet (2.96 acres) of buildable lot area. The Redevelopment Plan limits the total floor area of the site to a ratio of 6:1 or approximately 773,964 square feet based on buildable lot area. Pursuant to the LAMC Section 14.5.3 the floor area of a building is divided by the lot area of the lot (prior to any dedications) upon which it is located. The Project proposes 657,514 square feet of floor area for an approximate 5.1:1 FAR. Thus, the floor area would be consistent with the LAMC.

Density

Per LAMC Section 12.22 A 18, the lot area requirements of the R5 Zone applies to all portions of buildings erected and used for residential purposes in the C4 Zone with the Regional Center Commercial land use designation. Per LAMC Section 12.12 C 4, under the R5 Zone, every lot shall have a minimum width of 50 feet and a maximum area of 5,000 square feet and the minimum lot area per dwelling unit shall be 200 square feet. The Project Site would be developed with up to 644 residential units (227 studio units, 165 1-bedroom units, 128 1-bedroom/den units, 106 2-bedroom units, and 18 2-bedroom/den units) and no guest rooms totaling approximately 642,014 square feet of residential floor area. 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 provide 64,440 square feet of open space for the residents. These common and private open space areas include, but are not limited to, an outdoor fire pit / gathering area, private outdoor patio areas for residential units, outdoor game area, indoor party room, dog park area, barbeque area, spa and downtown viewing deck, cabanas, indoor yoga and fitness area, and pool located on Level 7 (Amenity Podium). Pursuant to LAMC Section 12.21.G.3, the Applicant is requesting a 10% reduction in total open space. Thus, with approval of the 10% reduction in total open space, the Project would be consistent with the LAMC requirements for open space. The Proposed Project's open space would be attractively landscaped as shown in Figures II-28 and II-29 in Section II, Project Description. Landscaping would be located on the ground floor and Level 7 (Amenity Podium). As part of the open space requirements, the residential component of the Project includes planting trees at a rate of one tree for every four dwelling units. 161 trees are proposed on-site, which would be consistent with LAMC requirements. Thus, 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

Parking for the retail and residential uses on-site would be provided above grade on Level 1 through Level 6 for a total of six parking levels. As summarized in Table II-4, in the Project Description Chapter, the Proposed Project would meet the minimum on-site parking requirements of the LAMC. The Proposed Project would require a total of 1,010 parking spaces (979 residential parking spaces and 31 retail parking spaces). The Proposed Project plans to provide 1,124 total parking spaces (1,093 residential parking spaces and 31 retail parking spaces).

The Proposed Project would also provide the required amount of on-site bicycle parking in bicycle storage spaces. Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 72 short-term bicycle parking spaces and 652 long-term bicycle parking spaces, for a total of 724 bicycle parking spaces. The Project proposes to provide 724 spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

As discussed in the previous paragraphs, the Proposed Project would not conflict with the goals, objectives, and allowable land uses in the Los Angeles Municipal Code (LAMC). Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

As discussed in the preceding paragraphs, the Proposed Project would be in substantial compliance with local and regional plans applicable to the Project Site. Upon granting requests, any land use impacts would be considered 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 IV(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 a paved surface parking lot and two one-story commercial buildings. Therefore, the Proposed Project would not have the potential to cause such effects.

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?**

No 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 the Los Angeles Downtown Oil Field and Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. The Project Site is currently developed with a surface parking lot and two one-story commercial buildings. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Site has been historically used for the extraction of mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and no 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?

No 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. 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 historically been used for the extraction of mineral resources. Therefore, no impact to locally important mineral resources would occur.

XII. 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. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. 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).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

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 4.5 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 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.⁴¹

- 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?**

Potentially Significant Unless Mitigation Incorporated. 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 noise reduction device or techniques during the operation of the equipment. Additionally, 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. 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.

⁴¹ *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

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-12, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance). The noise levels shown in Table III-12 represent composite noise levels associated with typical 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 when measured at a reference distance of 50 feet from the center of construction activity. 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 be reduced to approximately 78 dBA L_{eq} at 100 feet from the source to the receptor, and would decline 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-12, during the approximate 32-month construction period.

**Table III-12
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.

Sensitive Receptors

Noise and vibration sensitive land uses identified within proximity to and with a direct line of sight of the Project Site were identified as follows:

1. Residential land uses (multi-family residential), located approximately 180 feet west of the Project Site fronting Sunset Place;
2. Residential land uses (multi-family residential), located approximately 60 feet south of the Project Site fronting Sunset Place;

3. 3020 Wilshire Boulevard #250, Rise Kohyang Middle School (middle school, grades 6-8 land use), located approximately 450 feet west of the Project Site fronting Wilshire Boulevard;
4. 2959-2973 Wilshire Boulevard, The Town House (listed in the National Register of Historic Places and Los Angeles Historic Cultural Monument), located approximately 115 feet immediately north of the Project Site across Wilshire Boulevard; and
5. 672 S. La Fayette Park Place, Granada Buildings (three to four-story buildings listed in the National Register of Historic Places and Los Angeles Historic Cultural Monument), located approximately 255 feet southeast of the Project Site.

The locations of these land uses relative to the Project Site are depicted in Figure III-1, Noise Monitoring and Sensitive Receptor Location Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure II-5, Photographs of the Surrounding Land Uses.

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 uses as the most likely sensitive receptors to experience noise level increases during construction. The detailed noise monitoring data are presented in Appendix E, Noise Monitoring Data, and are summarized in Table III-13, Existing Ambient Daytime Noise Levels in Project Site Vicinity. As shown in Table III-13, the ambient noise in the vicinity of the Project Site ranges from 67.9 to 73.2 L_{eq} . The maximum noise level during four 15-minute recordings was 88.5 dB L_{max} . The primary noise source at all four locations was vehicle traffic along the surrounding streets, including delivery trucks, buses, and street sweepers. Pedestrian traffic also contributed to the ambient noise levels, though to a lesser extent than the vehicle noise.

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, the Proposed Project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors would be increased by 5 dBA or more. As shown in Table III-14, Estimated Exterior Construction Noise at Sensitive Receptors, the ambient exterior noise levels at the identified off-site sensitive receptors would likely be exceeded by 5 dBA or more on a temporary and intermittent basis during the construction period at two of the sensitive receptors: the residential land uses to the immediate west of the Project Site and the residential land uses to the south. Thus, based on criteria established in the *L.A. CEQA Threshold Guide*, a substantial temporary or periodic increase in ambient noise levels would occur at the identified off-site sensitive receptors.



Source: Google Earth, Aerial View, 2016



Figure III-1
Noise Monitoring and Sensitive Receptor Location Map

**Table III-13
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	North of the Project Site, adjacent to Lafayette Park	Vehicular traffic, pedestrian activity, park visitors, buses/bus stop	71.4	57.3	88.5
2	On the southeast corner of Hoover Street and Wilshire Boulevard	Vehicular traffic, pedestrian activity, street sweeper	71.1	56.4	86.0
3	On the northwest corner of Hoover Street and Sunset Place	Vehicular traffic, pedestrian activity, tow truck, delivery truck	67.9	58.4	86.6
4	On the south side of the intersection of Commonwealth Avenue and Wilshire Boulevard	Heavy vehicular traffic, buses, pedestrian activity, delivery trucks	73.2	61.2	86.8

^a Noise measurements were taken on September 10, 2015 at each location for a duration of 15 minutes. See Appendix E of this IS/MND for noise monitoring data sheets.

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

Receptor	Sensitive Land Use	Distance to Project Site (feet)	Ambient Noise Levels (dBA L _{eq})	Estimated Exterior Noise Levels at Receptor (dBA L _{eq})	Noise Level Increase
1. Residential uses to the west	Residential	180	67.9	74.9	7.0
2. Residential uses to the south	Residential	60	67.9	84.4	16.5
3. Rise Kohyang Middle School	Middle school, grades 6-8.	450	73.2	66.9	-6.3
4. The Town House	Historic property, vacant hotel.	115	71.4	78.8	7.4
5. The Granada Buildings	Historic property, office/studio suites.	255	71.1	71.8	0.7

See Figure III-1, Noise Measurement and Sensitive Receptor Location Map.

Notes: “-” sound is estimated to be imperceptible from the sensitive receptor. 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.

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.

The City of Los Angeles Ordinance No. 178048 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 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday. In accordance with LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. Although the estimated construction-related noise levels associated with the Proposed Project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the Proposed Project would exceed the existing ambient noise levels at three of the identified off-site sensitive receptors by more than the 5 dBA threshold established by the *L.A. CEQA Thresholds Guide* during all construction phases, implementation of the following mitigation measures would reduce the noise levels associated with construction of the Proposed Project to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measures N-1 would ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible and temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Mitigation Measures

N-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- To the maximum extent practical, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with noise shielding and muffling devices.

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 HVAC equipment serving the existing buildings 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.

Noise from Mixed Use Commercial and Residential Land Uses

Due to the mixed-use nature of the Project, noise generated from the operation of proposed commercial uses 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, Regulatory Compliance Measure RC-N-1 would ensure that dwelling units associated with 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. Additionally, the Proposed Project would be required to comply with the following regulatory compliance measure: 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. With implementation of this regulatory compliance measure, impacts associated with interior noise levels at the proposed residences would be less than significant.

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).

Table III-15, 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-15, vibration velocities could range from 0.003 to 0.089

**Table III-15
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.

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.

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 both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are used 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-16, below.

**Table III-16
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
<i>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.</i>		

In terms of construction vibration impacts on buildings, the adjacent structures and identified historical structures in the Project vicinity would be exposed to vibration impacts. The vibration impacts on adjacent structures and historical buildings are shown in Table III-17, Project Vibration Impacts on Adjacent Structures and Historical Resources. The residential areas west of the Project Site are observed to be older residential structures. The residential areas to the south fronting Sunset Place are new residential buildings. The school to the west of the Project Site fronting Wilshire Boulevard is located in commercial office buildings that are observed to be modern commercial buildings. The commercial/office buildings to the west are observed to be modern commercial buildings. As discussed previously, the Town House and the Granada Buildings are located northwest and southeast of the Project Site, respectively. Both of these buildings are listed on the National Register of Historic Places and the Los Angeles Historic Cultural Monument and, therefore, are susceptible to building damage from groundborne vibration impacts. As shown in Table III-17, the construction activities of the Proposed Project not would have the potential to exceed the PPV ground-borne vibration level of 0.25 inches per second, and vibration impacts would therefore be considered less than significant. The construction vibration would not cause a significant impact on the adjacent structures that surround the Project Site. Therefore, groundborne vibration damage to adjacent structures and historical resources would be less than significant.

**Table III-17
Project Vibration Impacts on Adjacent Structures and Historic Resources**

Adjacent Structure / Historic Resources	Distance to Construction	Maximum Vibration Level during Construction (in/sec)	Vibration Threshold (in/sec)^a	Significant Impact?
1. Residential uses to the west	180	0.0	0.3	No
2. Residential uses to the south	60	0.02	0.5	No
3. Rise Kohyang Middle School	450	0.0	0.5	No
4. The Town House	115	0.01	0.25	No
5. The Granada Buildings	255	0.0	0.25	No

Notes: in/sec = inches per second
Source:
^a *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.*
It should be noted that the peak vibration levels at the nearby sensitive receptors during Project construction represents the highest composite vibration level that would be generated periodically during a worst-case construction activity and does not represent continuous vibration levels occurring through the construction day or period.

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.

In terms of human annoyance resulting from vibration generated during construction, residents and students in the first three sensitive receptors previously identified in this section would be exposed to increased vibration levels on a temporary and intermittent basis during the construction period. As shown in Table III-18, Estimated Vibration Levels at Nearest Sensitive Receptors, the sensitive receptors within the Proposed Project’s vicinity would not experience vibration impacts above the 80 VdB threshold from the Project’s construction. Implementation of the measures identified under Mitigation Measure N-1 would serve to reduce construction related vibration levels to the maximum extent feasible, and thus would reduce the annoyance factor to an acceptable level. Furthermore, all construction activity will be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Because any vibration level increases experienced at the residential uses in close proximity to the Project Site would occur during the acceptable time periods for construction activities, 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 Hoover Street, Wilshire Boulevard, and Sunset Place, the proposed land uses would not result

in a substantial increased 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.

**Table III-18
Estimated Vibration Levels at Nearest Sensitive Receptors**

Receptor	Sensitive Land Use	Distance to Project Site (feet)	Estimated Vibration Levels (VdB)	Vibration Threshold (VdB)	Significant Impact?
1. Residential uses to the west	Residential	180	61.3	80	No
2. Residential uses to the south	Residential	60	75.6	80	No
3. Rise Kohyang Middle School	Middle school	450	49.3	80	No

See Figure 1, Noise Measurement and Sensitive Receptor Location Map.
Notes: 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.
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006.

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* threshold 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-19, 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-19
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.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater noise increase to the ambient noise level. Locations in the Project vicinity are expected to experience slight increases in ambient noise levels as a result of an increase in motor vehicle trips associated with the Proposed Project. For purposes of quantifying the Proposed Project’s noise impacts resulting from mobile noise sources, the existing noise level from existing traffic volumes at the fifteen study intersections was calculated based on the Existing (2015) Plus Project traffic conditions as reported in the Project Traffic Study (see Appendix F). This methodology is based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Nov. 2009) formula for adding and subtracting equal sound pressure levels when the existing noise level is known. The existing noise level for all fifteen study intersections was assumed to be 73.2 dBA (L_{eq}), which is the recorded noise level at the intersection of Commonwealth

Avenue and Wilshire Boulevard. Based on the existing and future traffic volumes as reported in Appendix F, future roadway noise levels were then forecasted to determine if the Proposed Project's vehicular traffic would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Proposed Project. A substantial permanent increase would result if the Existing Plus Project noise levels exceed the existing traffic noise levels by more than 3 dBA. As shown in Table III-20, none of the fifteen study intersections would experience a noise level increase greater than 0.30 dBA. Therefore, the Proposed Project's mobile source noise impacts would be less than significant.

**Table III-20
Project Roadway Noise Impacts**

Street Intersection	Peak Hour	Traffic Volume Noise Levels in dBA CNEL			
		Existing (2015) Without Project	Existing (2015) Plus Project	Increase	Significant Impact?
1. Vermont Avenue & Wilshire Boulevard	AM	73.2	73.24	0.04	No
	PM	73.2	73.25	0.05	No
2. Vermont Avenue & 8 th Street	AM	73.2	73.22	0.02	No
	PM	73.2	73.22	0.02	No
3. Virgil Avenue & Wilshire Boulevard	AM	73.2	73.25	0.05	No
	PM	73.2	73.26	0.06	No
4. Commonwealth Avenue & 3 rd Street	AM	73.2	73.24	0.04	No
	PM	73.2	73.24	0.04	No
5. Commonwealth Avenue & 6 th Street	AM	73.2	73.25	0.05	No
	PM	73.2	73.25	0.05	No
6. Commonwealth Avenue & Wilshire Boulevard	AM	73.2	73.40	0.20	No
	PM	73.2	73.39	0.19	No
7. Hoover Street & Wilshire Boulevard	AM	73.2	73.27	0.07	No
	PM	73.2	73.27	0.07	No
8. Hoover Street & 7 th Street	AM	73.2	73.32	0.12	No
	PM	73.2	73.30	0.10	No
9. Hoover Street & 8 th Street	AM	73.2	73.23	0.03	No
	PM	73.2	73.23	0.03	No
10. Hoover Street & Olympic Boulevard	AM	73.2	73.22	0.02	No
	PM	73.2	73.22	0.02	No
11. Hoover Street & Pico Boulevard	AM	73.2	73.23	0.03	No
	PM	73.2	73.23	0.03	No
12. Rampart Boulevard & Wilshire Boulevard	AM	73.2	73.24	0.04	No
	PM	73.2	73.26	0.06	No
13. Alvarado Street & Wilshire Boulevard	AM	73.2	73.23	0.03	No
	PM	73.2	73.23	0.03	No
14. Alvarado Street & 8 th Street	AM	73.2	73.21	0.01	No
	PM	73.2	73.21	0.01	No
A. Hoover Street & Sunset Place	AM	73.2	73.50	0.30	No
	PM	73.2	73.44	0.24	No

*Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Oct. 1998) formula for adding and subtracting equal sound pressure levels.
Traffic volumes are based on the Traffic Impact Study, Fehr & Peers, dated March 2016.*

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. Therefore, this impact would be less than significant.

Parking Noise

Activities within the designated surface parking areas associated with the Proposed Project would have the potential to increase ambient noise levels in the area. Sources of noise within the surface 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 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 substantially similar to the existing noise generated at the surface parking areas on the Project Site. 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 five decibels. Impacts with respect to the Proposed Project's surface parking areas would be mitigated to a less than significant level with implementation of Mitigation Measure N-2 below.

Mitigation Measures:**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.

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 less than significant for construction noise and vibration, and operational noise and vibration. Implementation of Mitigation Measures N-1 through 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 any noise impacts would be mitigated to 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 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 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. 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 91 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 to the extent feasible.

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, as shown in Table III-21, Cumulative Roadway Noise Impacts, above. The highest increase in local noise levels shows a maximum of 1.00 dBA CNEL at the intersection of Virgil Avenue and Wilshire Boulevard

during the PM peak hour which would be inaudible to most people. This maximum noise increase 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 traffic noise would be less than significant.

**Table III-21
Cumulative Roadway Noise Impacts**

Street Intersection	Peak Hour	Traffic Volume Noise Levels in dBA CNEL			
		Existing (2015) Without Project	Future (2020) Plus Project	Increase	Significant Impact?
1. Vermont Avenue & Wilshire Boulevard	AM	73.2	73.87	0.67	No
	PM	73.2	73.95	0.75	No
2. Vermont Avenue & 8 th Street	AM	73.2	73.72	0.52	No
	PM	73.2	73.84	0.64	No
3. Virgil Avenue & Wilshire Boulevard	AM	73.2	74.02	0.82	No
	PM	73.2	74.20	1.00	No
4. Commonwealth Avenue & 3 rd Street	AM	73.2	73.64	0.44	No
	PM	73.2	73.67	0.47	No
5. Commonwealth Avenue & 6 th Street	AM	73.2	73.66	0.46	No
	PM	73.2	73.72	0.52	No
6. Commonwealth Avenue & Wilshire Boulevard	AM	73.2	74.05	0.85	No
	PM	73.2	74.15	0.95	No
7. Hoover Street & Wilshire Boulevard	AM	73.2	73.96	0.76	No
	PM	73.2	74.08	0.88	No
8. Hoover Street & 7 th Street	AM	73.2	73.94	0.74	No
	PM	73.2	73.97	0.77	No
9. Hoover Street & 8 th Street	AM	73.2	73.71	0.51	No
	PM	73.2	73.77	0.57	No
10. Hoover Street & Olympic Boulevard	AM	73.2	73.73	0.53	No
	PM	73.2	73.85	0.65	No
11. Hoover Street & Pico Boulevard	AM	73.2	73.72	0.52	No
	PM	73.2	73.81	0.61	No
12. Rampart Boulevard & Wilshire Boulevard	AM	73.2	73.96	0.76	No
	PM	73.2	74.07	0.87	No
13. Alvarado Street & Wilshire Boulevard	AM	73.2	73.86	0.66	No
	PM	73.2	73.94	0.74	No
14. Alvarado Street & 8 th Street	AM	73.2	73.68	0.48	No
	PM	73.2	73.74	0.54	No
A. Hoover Street & Sunset Place	AM	73.2	73.97	0.77	No
	PM	73.2	74.00	0.80	No

*Source: Calculations based on the California Department of Transportation (Caltrans), Technical Noise Supplement (Oct. 1998) formula for adding and subtracting equal sound pressure levels.
Traffic volumes are based on the Traffic Impact Study, Fehr & Peers, dated March 2016.*

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)

In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 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, in 2012, the City of Los Angeles had an estimated permanent population of approximately 3,845,500 persons with approximately 1,325,500 residences and 1,696,400 jobs. By the year 2040, SCAG forecasts the City of Los Angeles will increase to 4,609,400 persons (or a 20% increase since the year 2012) with approximately 1,690,300 residences (or a 28% increase since the year 2012) and 2,169,100 jobs (or a 28% increase since the year 2012). SCAG's population and housing projections for the City of Los Angeles and the SCAG region as a whole for 2012 and 2040 are further summarized in Table III-22, 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, fully developed property in an existing commercial area. The Proposed Project is an infill

**Table III-22
SCAG Population and Housing Projections for the
City of Los Angeles and the SCAG Region**

Population			
	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			
	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			
	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%
<i>Source:</i>			
^a SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.			
^b SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, adopted April 2016.			

development Project within the Wilshire Community Plan Area in 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. The U.S. Census Bureau reported the City of Los Angeles as having a population of 3,792,621 persons and 1,413,995 housing units in 2010.⁴² As shown in Table III-22, SCAG Population and Housing Projections for the City of Los Angeles and the SCAG Region the forecast from 2012 through 2040 envisions a population growth of 763,900 additional persons (an approximate 20% growth rate) and 3,816,000 additional persons (an approximate 21% growth rate), respectively. 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. By 2040, the City of Los Angeles is expected to experience a 20% population growth, 28% household unit growth, and a 28% employment growth as compared to the 2012 values.

⁴² U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, American Community Survey, Census of Population and Housing, County Business Patterns, Economic Census, Survey of Business Owners, Building Permits, Census of Governments, Last Revised: Wednesday, 22-Apr-2015.

Based on the community's current household demographics (e.g., an average of 2.54 persons per household for the Wilshire area), the construction of up to 644 residential dwelling units would result in an increase of approximately 1,636 net permanent residents in the City of Los Angeles.⁴³ The proposed increase in housing units and population would be consistent with the SCAG forecast of 364,800 additional households and approximately 763,900 persons in the City of Los Angeles between 2012 and 2040. As such, the Proposed Project would not 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 Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment. The Proposed Project would not introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan.

According to the Department of City Planning, the Wilshire Community Plan projected a population of 337,144 persons and 138,330 dwelling units by 2010 within the Community Plan area.⁴⁴ The 2010 United States Census shows that the Wilshire Community Plan area had an actual population of 278,968 persons and 126,091 dwelling units in 2010.⁴⁵ The 2010 Census data shows that the actual population and number of households in the Wilshire CPA was lower than projected. The Wilshire CPA 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 Wilshire CPA 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 Wilshire CPA also notes that community plan capacity does not include housing in commercial districts (such as the commercial district in which the Project is located) nor the current residential vacancy rate. Because the actual population and housing stock is lower than what was projected in the Community Plan, the Project would be consistent with the City's goals of increasing mixed-use development near retail and services, and within a transit-rich area. Additionally, as discussed above, the Project addition of up to 644 dwelling units and 1,636 net

⁴³ *City of Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Wilshire Community Plan Area, website: <http://cityplanning.lacity.org/DRU/Loc/Frame.cfm?geo=CP&loc=Wil&sgo=ct&rpt=PnH&yrx=Y09>, accessed September 2015.*

⁴⁴ *City of Los Angeles Department of City Planning, Wilshire Community Plan, Plan, pg II-4.*

⁴⁵ *The Wilshire Community Plan Area contains the following tracts: 1923, 1924.10, 1924.20, 1925.10, 1925.20, 1926.10, 1926.20, 1927, 1945, 2110, 2111.20, 2111.21, 2111.22, 2112.01, 2112.02, 2113.10, 2113.20, 2114.10, 2114.20, 2115, 2117.01, 2117.03, 2117.04, 2118.02, 2118.03, 2118.04, 2119.10, 2119.21, 2119.22, 2121.01, 2121.02, 2122.02, 2122.03, 2122.04, 2123.03, 2123.04, 2123.05, 2123.06, 2124.10, 2124.20, 2125.01, 2125.02, 2126.10, 2126.20, 2127.01, 2127.02, 2128, 2129, 2131, 2132.01, 2132.01, 2133.10, 2133.20, 2134.04, 2134.02, 2140, 2141, 2144, 2145.01, 2145.01, 2145.02, 2145.03, 2146, 2147, 2148, 2149.01, 2149.02, 2151.01, 2151.02, 2161, 2162, 2163, 2164.01, 2164.02, 2167, 2168, 2169, 2170.01, 2170.02, 2171, 2172. The population and dwelling units were calculated by summing the individual tracts together. Source: United States Census Bureau, 2010 Census Interactive Population Map, website: <http://www.census.gov/2010census/popmap/>, accessed September 2015.*

permanent residents is consistent with SCAG's growth projections for the Los Angeles region. Therefore, impacts related to induced population growth would be less than significant.

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 Proposed Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by a surface parking lot and two commercial buildings. As such, the Proposed Project would not displace any existing housing. The proposed mixed-use residential and retail uses are consistent with the allowable uses as permitted by the zoning and General Plan land use designations. Therefore, no impact would occur.

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

No Impact. The Proposed Project would consist of the development of a mixed-use residential and commercial building on a site that is currently occupied as an improved surface parking lot and two commercial buildings. No displacement of existing housing would occur with the development of the Proposed Project. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the City of Los Angeles. Any residential related projects would result in direct population growth in the City of Los Angeles. As shown in Table III-23, the Proposed Project and related projects that involve residential developments would cumulatively contribute 28,379 new residential dwelling units, generating approximately 72,083 new residents.

As discussed in Question XIII(a), the Proposed Project would not exceed the growth projections of SCAG's RCP for the City of Los Angeles subregion. Furthermore, the Proposed Project is the type of project encouraged by SCAG and City policies, as the Project would promote and help accommodate growth in urban centers that are close to existing employment centers and mass transit. 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.

**Table III-23
Projected Cumulative Housing Units**

Related Projects (By Housing Type)	Total Housing Units	Total Residents^a
Apartments/Condominiums ^b		
Related Projects Total:	27,735	70,447
Proposed Project Net Total:	644	1,636
Cumulative Total:	28,379	72,083
<p><i>Notes:</i></p> <p>^a Apartment/Condominiums result in direct population growth.</p> <p>^b Based on a generation rate of 2.54 residents per dwelling unit. Los Angeles Department of City Planning Demographic Research Unit, City of Los Angeles: 2009 Population Estimate Population by Housing Type, Wilshire Community Plan Area, website: http://cityplanning.lacity.org/DRU/Loc/LocFrame.cfm?geo=CP&loc=Wil&sgo=ct&rpt=PnH&yrx=Y09, accessed September 2015.</p> <p>Source: Parker Environmental Consultants, 2016.</p>		

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

Potentially Significant Unless Mitigation Incorporated.

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. Mitigation Measures T-1 through T-3 require that a Construction Traffic Management Plan and a Construction Worker Parking Plan be submitted to the Department of Transportation (DOT) 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.

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. 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 project is located beyond the maximum response distance.

The Proposed Project would include up to 644 dwelling units and 15,500 square feet of ground floor commercial space, which would generate approximately 1,636 new residents and 26 employees.^{46,47} Thus, the Proposed Project would increase the utilization of the Project Site, which is currently used as a rental car center with surface parking and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 11, located at 1819 West 7th Street, which is approximately 0.7 mile southeast of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 11 to the Project Site, fire protection response would be considered adequate. Furthermore, the Proposed Project would be required to comply with the following regulatory compliance measure. The recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department 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, with

⁴⁶ A residential generation rate of 2.54 was used. Source: <http://cityplanning.lacity.org/DRU/Loc/Frame.cfm?geo=CP&loc=Wil&sgo=ct&rpt=PnH&yryx=Y09>, accessed September 2015.

⁴⁷ An employee rate of 588 square feet per employee was used. Source: *U.S. Green Building Code, Building Area per Employee by Business Type, Neighborhood Retail, May 13 2008.*

implementation of this regulatory compliance measure and mitigation measures discussed above, impacts related to fire protection would be reduced to less than significant levels.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 91 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. 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

Less Than Significant Impact. For the purpose of this Initial Study, 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. 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 644 dwelling units and 15,500 square feet of ground floor commercial space, which would generate approximately 1,636 new residents and 26 employees.^{48,49} Thus,

⁴⁸ A residential generation rate of 2.54 was used. Source: <http://cityplanning.lacity.org/DRU/Loc/ LocFrame.cfm?geo=CP&loc=Wil&sgo=ct&rpt=PnH&yxr=Y09>, accessed September 2015.

⁴⁹ An employee rate of 588 square feet per employee was used. Source: *U.S. Green Building Code, Building Area per Employee by Business Type, Neighborhood Retail, May 13 2008.*

the Proposed Project would increase the utilization of the Project Site, which is currently used as a car rental service with surface parking and would potentially increase the demand for LAPD services. The Project Site is located in the Olympic Area division of the LAPD's West Bureau. The West Bureau is approximately 124 square miles and includes the Hollywood, Wilshire, Pacific and West Los Angeles, Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and Miracle Mile.⁵⁰ The Project Site is served by the Olympic Community Police Station located at 1130 S. Vermont Avenue, which is approximately 0.9 miles southwest of the Project Site. Within the Olympic Area, the Proposed Project is located within Reporting District (RD) 2039.⁵¹ Table III-24, Olympic Community Police Station Crime Statistics, provides crime statistics for Olympic 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. With implementation of the following regulatory compliance measure, which requires the plans to incorporate the Design Guidelines, Project impacts would be less than significant during the construction period.

The Proposed Project would be required to comply with the following regulatory compliance measure:

Regulatory Compliance Measure (RCM) P-1 The plans shall incorporate the Design Guidelines (defined in the following sentence) 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" ("Design Guidelines"), 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.

Implementation of the Proposed Project would result in an increase of site visitors, residents, 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 would be anticipated to 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 thematic lighting to enhance public safety. Visually obstructed and

⁵⁰ Los Angeles Police Department, "About West Bureau," http://www.lapdonline.org/west_bureau/content_basic_view/1869, accessed September 2015.

⁵¹ Los Angeles Times Local, Mapping L.A. LAPD Central Division, Reporting District 2039, website: <http://maps.latimes.com/lapd/reporting-district/2039/>, accessed September 2015.

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 residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD. Furthermore, the Proposed Project would be required to comply with the above regulatory compliance measure (RCM P-1), which requires the plans to incorporate the Design Guidelines. With implementation of RCM P-1 the Proposed Project’s potential impact upon LAPD services would be mitigated to a less than significant level.

**Table III-24
Olympic Community Police Station Crime Statistics**

Crimes	2015 (Year to Date) ^a	2014 (Year to Date)	2013 (Year to Date)
<i>Violent Crimes</i>			
Homicide	9	8	3
Rape	76	62	53
Robbery	495	399	405
Aggravated Assault	396	357	283
Total Violent Crimes	976	826	744
<i>Property Crimes</i>			
Burglary	499	488	394
Motor Vehicle Theft	492	395	421
BTFV	1,106	886	769
Personal / Other Theft	986	862	945
Total Property Crimes	3,083	2,631	2,529
Total Part 1 Crimes	4,059	3,457	3,273
Child / Spousal Abuse (Part I & II) ^b	601	491	351
Shots Fired	53	43	33
Shooting Victims	22	25	19
<i>Notes:</i>			
^a Crime Statistics for week ending October 17, 2015.			
^b Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.			
Source: Los Angeles Police Department, COMPSTAT Unit, Olympic Area Profile, 2015.			

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 91 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. 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

Potentially Significant Unless Mitigation Incorporated. 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 the LAUSD Board District 2. The Project Site is currently served by one elementary school, three middle schools, and five 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
Hoover Street Elementary	K-5	2726 Francis Avenue
Berendo Middle School	6-8	1157 S. Berendo Street
Rise Kohyang Middle School	6-8	3020 Wilshire Boulevard, #205
Los Angeles Academy of Arts & Enterprise	6-12	600 S. La Fayette Park Place
Larchmont Charter School	6-12	2108 W. 6 th Street
Miguel Contreras Learning Complex (includes: Academic Leadership Community, School of Business and Tourism, School of Social Justice, and School of Global Studies)	9-12	322 S. Lucas Avenue
Ramon C. Cortines School of Visual & Performing Arts	9-12	450 N Grand Avenue
Belmont Senior High School (includes: Los Angeles Teacher Preparatory Academy)	9-12	1200 W. Colton Street and 1575 W. 2nd Street
Edward R. Roybal Learning Center	9-12	1200 W. Colton Street
<p><i>Notes: Some schools are charter schools and require an application process prior to student enrollment. Source: (a) Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed September 2015. (b) Navigate LA, http://navigatea.lacity.org/navigatea/, accessed October 2015. Parker Environmental Consultants, 2015.</i></p>		

Construction

Based on a review of the Schools identified in Table III-25, below, the closest school to the Project Site is the Rise Kohyang Middle School, located approximately 450 feet west of the Project Site. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. The Proposed Project would provide appropriate construction measures to reduce the Project’s impacts upon the nearby school facility. Further, the Project’s proposed haul route will be designed to minimize, to the greatest degree possible, hauling impacts on Rise Kohyang Middle School. The proposed haul route for the Proposed Project would be southbound on Hoover Street to the eastbound I-10 Freeway, to the northbound I-110 Freeway, to the northbound SR-170 Freeway, to the northbound I-5 Freeway to the Sunshine Canyon Landfill. The construction vehicles are not expected to pass by the Rise Kohyang Middle School. With implementation of mitigation measures, HAZ-1 and HAZ-2, the Proposed Project would have less than significant impact.

Operation

As shown in Table III-26, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 106 elementary students, 29 middle school students and 61 high school students, for a total of approximately 196 students. Furthermore, 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. Pursuant to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.” The Proposed Project would also be required to comply with the following regulatory compliance measure: 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. Thus, the Proposed Project’s potential impact upon public school services would be mitigated to a less than significant level by implementation of the above regulatory compliance measure.

**Table III-26
Proposed Project Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Proposed Project					
Multi-Family Residential ^a	644 du	106.2	29.0	60.7	195.9
Retail ^b	15,500 sf	0.2	0.1	0.1	0.4
Total Estimated Students		106.4	29.1	60.8	196.3
<i>Notes:</i>					
<i>sf = square feet; du = dwelling units</i>					
<i>^a Student generation rates are as follows for multi-family residential uses: .1649 elementary, .0450 middle and .0943 high school students per unit. Los Angeles Unified School District, School Facilities Needs Analysis for Los Angeles Unified School District, September 2012.</i>					
<i>^b 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: Los Angeles Unified School District, School Fee Justification Study, September 2002.</i>					
<i>Source: Parker Environmental Consultants, 2015.</i>					

Cumulative Impacts

Less Than Significant Impact. The Proposed Project, in combination with the 91 related projects is expected to result in a cumulative increase in the demand for school services. While the Proposed Project would not result in a significant impact 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-27, Projected Cumulative Student Generation, the Proposed Project and related projects would cumulatively contribute approximately 4,165.7 elementary school students, 1,127.8 middle school students and 2,295 high school students.

Upgrades to existing schools and the construction of new school would be addressed by the LAUSD Facilities Services Division, which is responsible for the execution of the District's current bond programs, the maintenance and operations of schools, the utilization of existing assets, and master planning for future capital projects. The Facilities Services Division Strategic Execution Plan (2013) outlines the New School Construction Plan, the Repair and Modernization Program, the Joint Use/Innovation Fund and Charter Facilities Program, the Capital Improvement Program and the Capital Needs Assessment Master Planning and Facilities Condition Assessment. Furthermore, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Therefore, cumulative impacts on schools would be considered less than significant.

**Table III-27
Projected Cumulative Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Single-Family Attached ^a	6,911 du	366.3	100.2	209.4	675.9
Multi-Family Residences ^b	20,824 du	3,433.9	937.1	1,963.7	6,334.7
Office ^c	3,755,603 sf	87.5	40.6	39.0	167.2
Retail ^d	2,370,346,sf	161.9	16.9	17.2	196.9
Hotel ^e	811,750 sf	6.2	2.8	2.8	11.8
Related Projects Total:		4,059.3	1,098.7	2,234.2	7,392.2
Proposed Project Net Total:		106.4	29.1	60.8	196.3
Cumulative Total:		4,165.7	1,127.8	2295	7,588.5

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 office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.
^d Student generation rates are as follows for retail/commercial uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet.
^e Student generation rates are as follows for hotel uses: .0076 elementary, .0035 middle and .0034 high school students per 1,000 sf. Los Angeles Unified School District, School Fee Justification Study, September 2002
 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 of square feet per occupant are based on California Building Code (2013), Ch.10, Table 1004.1.2.

(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, 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).

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. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

The Proposed Project is located within a highly urbanized area within the Wilshire Community Plan Area. As shown in Table III-28, there are approximately 105.5 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site. These facilities range from 0.32-acres (Laurel and Hardy Park) to 29.86 acres (Mac Arthur Park). As discussed in Checklist Question XII (a), it is estimated that the development of the Proposed Project would result in an increase of 1,623 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 need for approximately 6.54 acres of public parkland. This demand would be met 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 a total of 64,440 square feet of common and private open space areas incorporated throughout the Project Site. These common and private open space areas include, but are not limited to, an outdoor fire pit / gathering area, private outdoor patio areas for residential units, outdoor game area, indoor party room, dog park area, barbeque area, spa and downtown viewing deck, cabanas, indoor yoga and fitness area, and pool located on Level 7 (Amenity Podium), thereby achieving 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 tax of

**Table III-28
Recreation and Park Facilities within the Project Area**

Park Name	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Lafayette Park and Community Center	8.1	Children's play area, picnic tables, basketball courts, tennis courts, community room, soccer field, kitchen, stage, TV area, skate park	0.01
2. 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	0.31
3. Shatto Recreation Center	5.5	Auditorium, baseball diamond, basketball courts, children's play area, community room, tennis courts, volleyball courts	0.42
4. Hope and Peace Park	0.57	Basketball courts and benches	0.71
5. Lake Street Park and Community Center	1.83	Basketball courts, children's play area, volleyball courts, skate park	0.98
6. Alvarado Terrace Park	0.91	Children's play area and gazebo	1.08
7. Seoul International Park	1.87	Children's play area, picnic tables, auditorium, baseball diamond, indoor gym, jogging path, kitchen, patio, stage	1.10
8. Madison West Park	0.52	Children's play area, open space	1.26
9. Pico Union Park	0.35	Children's play area, picnic tables	1.32
10. Normandie Park and Recreation Center	3.32	Indoor gymnasium, auditorium, baseball diamond, basketball courts, children's play area, community room, picnic tables	1.32
11. Toberman Recreational Center	2.81	Auditorium, barbecue pits, baseball diamond, basketball courts, children's play area, community room, indoor gym, picnic tables	1.45
12. Echo Deep Pool	1.04	Year-round indoor pool which offers various programming	1.47
13. Echo Park, Recreation Center, and Lake	28.6	Children's play area, picnic tables, basketball courts, tennis courts, barbecue pits, pool, soccer field, boathouse, paddle boats	1.47
14. Bellevue Recreation Center	9.11	Children's play area, picnic tables, auditorium, basketball courts, indoor gym, barbecue pits, baseball diamond, football field, jogging path, community room, multi-purpose field	1.53
15. Vista Hermosa Park	2.13	Children's play area, picnic tables, soccer field	1.56
16. Laurel and Hardy Park	0.32	Pocket park	1.56
17. Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	1.95
18. Hoover Recreation Center	2.51	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	2.00
19. Robert L. Burns Park	1.73	Children's play area, picnic tables	2.00
Total Parkland (Approximate):	105.52		

Sources: Park distance from the Project Site and amenities were determined using:

(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, <http://www.laparks.org/>, accessed September 2015;

(2) LA Parks Foundation, Find a Park, Google Maps, Satellite View, 2015. <http://www.laparksfoundation.org/EN/>, accessed September 2015.

(3) Size of each park was determined using Navigate LA, <http://navigatea.lacity.org/navigatea/>, accessed September 2015.

\$200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, which is a regulatory compliance measure, payable to the Department of Building and Safety, shall be deposited into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City’s mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, the Proposed Project’s impact upon parks and recreational facilities would be 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 are required to comply with payment of Quimby (for condominium units) and Parks and Recreation Fee (for apartment units). 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.

(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, eight regional branches and 64 community branches. Approximately 6.2 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

-
- Felipe de Neve Branch Library – 2820 W. 6th Street, approximately 0.1 miles north of the Project Site;
 - Pico Union Branch – 1030 S. Alvarado Street, approximately 0.7 miles south of the Project Site;
 - Pio Pico – Koreatown Branch Library – 694 S. Oxford Avenue, approximately 1.2 miles east of the Project Site; and
 - Wilshire Branch Library – 149 N. Saint Andrews Place, approximate 1.7 miles northwest of the Project Site.⁵²

It is assumed that the library demands of the surrounding community are currently being met and the existing library facilities would be able to meet the Proposed Project's demand for library services. Therefore, the Proposed Project's impacts upon library services would be less than significant.

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 1,636 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 2007-2010 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Thus, the 1,636 additional residents generated by the Proposed Project 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, 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

⁵² *City of Los Angeles Public Library, Hours and Locations, website: <http://www.lapl.org/branches>, accessed September 2015.*

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-28, above, there are 19 existing new and recently improved parks within the Project Area totaling more than 105 acres that are available to serve the future residents and retail visitors to the Project Site. The Proposed Project would include a total of 64,440 square feet of common and private open space areas incorporated throughout the Project Site. These common and private open space areas include, but are not limited to, an outdoor fire pit / gathering area, private outdoor patio areas for residential units, outdoor game area, indoor party room, dog park area, barbeque area, spa and downtown viewing deck, cabanas, indoor yoga and fitness area, and pool located on Level 7 (Amenity Podium). 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, the Project will comply with the regulatory compliance measure discussed above, which states the Project shall pay the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses. 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 19 existing, new, or recently improved parks within the Project Area totaling more than 105 acres that are available to serve the future residents and retail visitors to the Project Site. The Proposed Project would also provide approximately 64,440 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 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 91 related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. Similar to the Proposed Project’s requirement to pay a Dwelling Unit Construction Tax 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 2900 Wilshire Project, Draft Transportation Impact Analysis prepared by Fehr & Peers, dated March 2016.⁵³ The Traffic Study and related correspondence from the Los Angeles Department of Transportation (LADOT) are provided as Appendix F.

- 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 Transportation Research Board Circular 212 Critical Movement Analysis (CMA) Planning Method was used to analyze traffic operating conditions at study intersections. CMA methodology compares the amount of traffic an intersection is able to process (capacity) to the level of traffic during peak hours (volume). The resulting volume-to-capacity ratio (v/c) is expressed in terms of level of service (LOS). LOS A represents free-flow activity and LOS F represents overcapacity operation. LOS is a qualitative assessment of the quantitative effects of such factors as traffic volume, roadway geometrics, speed, delay, and maneuverability on roadway and intersection operations.

The City of Los Angeles determines whether a transportation impact at a signalized intersection is

⁵³ *The Proposed Project includes 13,200 square feet of ground floor retail. For a conservative analysis, the Traffic Study analyzed a 10,000 square feet of ground floor retail and a 5,500 square foot restaurant.*

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-29, Definition of Significant Impact at Intersection, below.

**Table III-29
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

Operational Traffic

A total of fifteen intersections were identified, in conjunction with LADOT staff, for inclusion in the traffic analysis. The analyzed locations are shown in Figure 1 of the Traffic Study. Fourteen signalized intersections were selected for analysis and were analyzed for potential impacts using the signalized intersection methodologies used by the City of Los Angeles. The traffic analysis was also prepared in accordance with LADOT’s Traffic Study Policies and Procedures (August 2014). In accordance with LADOT’s Traffic Study Policies and Procedures, one unsignalized intersection (Hoover Street and Sunset Place) was additionally analyzed in the Traffic Study to determine if the intersection met the traffic signal warrant criteria. However, per the Traffic Study Policies and Procedures (LADOT, August 2014), a significant impact analysis was not conducted for the Hoover Street & Sunset Place intersection.

The fourteen signalized study intersections currently operate under the City’s Automated Traffic Surveillance and Control (ATSAC) system which is a centralized control system that provides for the coordination of traffic signal timing to maximize the street capacities and to minimize traffic delays on City streets. None of these intersections are Los Angeles County Congestion Management Plan (CMP) monitoring locations. In addition, a CMP analysis is not required because the Project would not add 50 or more peak-hour trips to any CMP arterial monitoring intersections, including freeway on- and off-ramps. Furthermore, the Project would not add 150 or more peak-hour trips to freeway mainline monitoring locations. The intersections identified for analysis are as follows:

- | | |
|---|--|
| 1. Vermont Avenue and Wilshire Boulevard | 8. Hoover Street and 7 th Street |
| 2. Vermont Avenue and 8 th Street | 9. Hoover Street and 8 th Street |
| 3. Virgil Avenue and Wilshire Boulevard | 10. Hoover Street and Olympic Boulevard |
| 4. Commonwealth Avenue and 3 rd Street | 11. Hoover Street and Pico Boulevard |
| 5. Commonwealth Avenue and 6 th Street | 12. Rampart Boulevard and Wilshire Boulevard |
| 6. Commonwealth Avenue and Wilshire Boulevard | 13. Alvarado Street and Wilshire Boulevard |
| 7. Hoover Street and Wilshire Boulevard | 14. Alvarado Street and 8 th Street |
| A. Hoover Street and Sunset Place (unsignalized) | |

Existing Intersection Conditions

The unsignalized Hoover Street and Sunset Place intersection was selected for traffic signal warrant analysis. Per the Traffic Study Policies and Procedures (LADOT, August 2014), a significant impact analysis was not conducted for the Hoover Street & Sunset Place intersection. Recent traffic counts were used for all of the analyzed signalized intersections. AM and PM peak period counts (7-10 AM and 3-6 PM) were conducted at all study intersection in September of 2015. The existing peak hour traffic volumes are illustrated in Table III-30 for the AM and PM peak hours (highest volume hours within peak periods). All of the fourteen signalized studied intersections operate at LOS D or better during the AM and PM peak hour.

Table III-30
Existing Condition – Intersection Level of Service

Intersection	Existing Conditions			
	AM		PM	
	V/C	LOS	V/C	LOS
1. Vermont Avenue and Wilshire Boulevard	0.756	C	0.709	C
2. Vermont Avenue and 8 th Street	0.695	B	0.647	B
3. Virgil Avenue and Wilshire Boulevard	0.572	A	0.562	A
4. Commonwealth Avenue and 3 rd Street	0.577	A	0.666	B
5. Commonwealth Avenue and 6 th Street	0.589	A	0.544	A
6. Commonwealth and Wilshire Boulevard	0.533	A	0.477	A
7. Hoover Street & Wilshire Boulevard	0.631	B	0.608	B
8. Hoover Street and 7 th Street	0.625	B	0.657	B
9. Hoover Street and 8 th Street	0.841	D	0.899	D
10. Hoover Street and Olympic Boulevard	0.878	D	0.865	D
11. Hoover Street and Pico Boulevard	0.639	B	0.746	C
12. Rampart Boulevard and Wilshire Boulevard	0.618	B	0.623	B
13. Alvarado Street and Wilshire Boulevard	0.563	A	0.564	A
14. Alvarado Street and 8 th Street	0.545	A	0.516	A

LOS = level of service; V/C = volume-to-capacity ratio
Per the Traffic Study Policies and Procedures (LADOT, August 2014), a significant impact analysis was not conducted for the unsignalized Hoover Street & Sunset Place intersection.
Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.

Existing Transit Service

Transit options in the vicinity of the Project Site are illustrated in Figure 3 of the Traffic Study. Due to its proximity to the transit hubs in the area, the project site is served by several transit lines. The Project Area is currently served by a total of four local and inter-city transit operators.

The Project Site is located within 0.3 mile of the Metro Red and Purple Lines at the Wilshire/Vermont Station and 0.5 mile of the Westlake/MacArthur Station and the Metro Rapid 720. In addition, Wilshire Boulevard has east-west dedicated bus lanes.

Table 1 of the Traffic Study lists the individual rail and bus lines serving the Project Area, and indicates the frequency of service during the key analysis times. The following is a summary of Transit Service of

Major Streets in the Project vicinity.

San Pedro & 7th Street. Located south of the Project Site, San Pedro and 7th Street carries three Metro Local Bus lines (51, 52, 352).

Alvarado Street. Located southeast of the Project Site, Alvarado Street carries one Metro Local Bus lines (200).

Hoover Street. Located south of the Project Site, Hoover Street carries one Metro Local Bus line (603).

3rd Street. Located northeast of the Project Site, 3rd Street carries two Metro Local Bus lines (16 and 316).

6th Street. Located north of the Project Site, 6th Street carries one Metro Local Bus line (18).

Wilshire Boulevard. Located immediately north of the Project Site, Wilshire Boulevard carries one Metro Local Bus line (20), one Metro Rapid line (720), one Foothill Regional line (481), and two Metro Rail lines (Red Line and Purple Line).

Vermont Avenue. Located west of the Project Site, Vermont Avenue carries two Metro Local Bus lines (201 and 204), one LADOT DASH bus line, and one Metro Rapid line (754).

8th Street. Located south of the Project Site, 8th Street carries one Metro Local Bus line (66).

Estimated Trip Generation

The Proposed Project's trip generation estimates are presented in Table III-31. As shown in Table III-31, the analysis estimates that the Project would generate a total of 3,482 daily vehicle trips, 216 AM peak hour vehicle trips and 218 PM peak hour vehicle trips. The daily and peak-hour trips for the project were generated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (9th Edition, 2012). Because of the commercial components of the Project, certain adjustments to the trip generation were therefore made to expect walk-ins either from the Project or surrounding area. The adjustments are approved by LADOT to reflect these conditions. For the trips generated by retail uses, a reduction of 10% for internal trips from the Project, 10% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 50% were applied. For the trips generated by restaurant uses, a reduction of 10% for internal trips from the Project, 10% for use of transit and walk-ins from the surrounding area, and a pass-by rate of 10% were applied.

Project Impacts***Existing With Project Intersection Level of Service***

Intersection analysis was conducted using the "Critical Movement Analysis (Planning Method)" as described in "Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980", to obtain volume/capacity (V/C ratios at each intersection. Figure 2.3 and 2.4 in the Traffic Report presents the existing a.m. and p.m. peak-hour turn movement volumes for the study area intersections.

**Table III-31
Project Trip Generation Estimates**

Land Use (Land Use Code ¹)	Size	Unit	ADT	AM Peak			PM Peak		
				In	Out	Total	In	Out	Total
Trip Rate									
Apartment (222)	644	du	4.2	0.08	0.22	0.3	0.21	0.14	0.35
Retail (820)	10,000	sf	42.70	0.60	0.36	0.96	1.78	1.93	3.71
Restaurant (933)	5,500	sf	716	26.32	17.55	43.87	13.34	12.81	26.15
Trip Generation									
Apartments	295	du	2,705	48	145	193	137	88	225
Retail	3,500	sf	427	6	4	10	18	19	37
Restaurant	3,500	sf	3,938	145	96	241	73	71	144
Total			7,070	199	245	444	228	178	406
Trip Reductions²									
Apartment – internal trips (17%)			-460	-3	-30	-33	-18	-12	-30
Retail – internal trips (10%)			-43	-1	-2	-3	-11	-11	-22
Retail – transit/walk trips (10%)			-38	-1	0	-1	-1	-1	-2
Retail – pass-by trips (50%)			-173	-2	-1	-3	-3	-3	-6
Restaurant – internal trips (10%)			-394	-30	-2	-32	-16	-22	-38
Restaurant – transit/walk trips (10%)			-354	-12	-9	-21	-6	-5	-11
Restaurant – pass-by trips (50%)			-1,595	-51	-42	-93	-25	-22	-47
Total			-3,057	-100	-86	-186	-80	-76	-156
Subtotal Proposed Project Trips			4,013	99	159	258	148	102	250
Subtotal Existing Trips			-531	-18	-24	-42	-11	-21	-32
Net Trip Generation			3,482	88	135	216	137	81	218
ADT = average daily traffic; du = dwelling units; sf = thousand square feet									
¹ ITE trip rates from Trip Generation, 9 th Edition, Institute of Transportation Engineers									
² Reduction rates based on City of Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures (2014).									
Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.									

As discussed above, the LOS were determined using the LADOT spreadsheet for calculating CMA methodology. Table III-32 summarizes the results of the Existing with Project AM and PM peak-hour LOS analyses for the fourteen study area intersections. As shown in Table III-32, the addition of Project traffic would not cause the level of service to change at the fourteen signalized study intersections during the AM peak hour, and any increases in V/C ratios would be less than significant. The addition of Project traffic would not cause the level of service to change at thirteen of the fourteen signalized study intersections during the PM peak hour, and any increases in V/C ratios would be less than significant. The addition of the Project traffic would cause the level of service to change at one intersection during the PM peak hour, Hoover Street and 8th Street (from LOS D to LOS E). However, the increase in V/C ratio at the Hoover Street and 8th Street intersection would be below the threshold of significance and, therefore, impacts would be less than significant.

**Table III-32
Existing With Project Condition - Level of Service Summary**

Intersection	Peak Hour	Existing		Existing With Project		Project Impact	Significant Impact?
		V/C	LOS	V/C	LOS		
1. Vermont Avenue and Wilshire Boulevard	AM	0.756	C	0.769	C	0.013	No
	PM	0.709	C	0.720	C	0.011	No
2. Vermont Avenue and 8 th Street	AM	0.695	B	0.699	B	0.004	No
	PM	0.647	B	0.655	B	0.008	No
3. Virgil Avenue and Wilshire Boulevard	AM	0.572	A	0.575	A	0.003	No
	PM	0.562	A	0.565	A	0.003	No
4. Commonwealth Avenue and 3 rd Street	AM	0.577	A	0.586	A	0.009	No
	PM	0.666	B	0.673	B	0.007	No
5. Commonwealth Avenue and 6 th Street	AM	0.589	A	0.597	A	0.008	No
	PM	0.544	A	0.551	A	0.007	No
6. Commonwealth and Wilshire Boulevard	AM	0.533	A	0.579	A	0.046	No
	PM	0.477	A	0.539	A	0.062	No
7. Hoover Street & Wilshire Boulevard	AM	0.631	B	0.639	B	0.008	No
	PM	0.608	B	0.621	B	0.013	No
8. Hoover Street and 7 th Street	AM	0.625	B	0.647	B	0.022	No
	PM	0.657	B	0.677	B	0.020	No
9. Hoover Street and 8 th Street	AM	0.841	D	0.847	D	0.006	No
	PM	0.899	D	0.907	E	0.008	No
10. Hoover Street and Olympic Boulevard	AM	0.878	D	0.882	D	0.004	No
	PM	0.865	D	0.871	D	0.006	No
11. Hoover Street and Pico Boulevard	AM	0.639	B	0.645	B	0.006	No
	PM	0.746	C	0.751	C	0.005	No
12. Rampart Boulevard and Wilshire Boulevard	AM	0.618	B	0.623	B	0.005	No
	PM	0.623	B	0.633	B	0.010	No
13. Alvarado Street and Wilshire Boulevard	AM	0.563	A	0.565	A	0.002	No
	PM	0.564	A	0.572	A	0.008	No
14. Alvarado Street and 8 th Street	AM	0.545	A	0.547	A	0.002	No
	PM	0.516	A	0.517	A	0.001	No

*LOS = level of service; V/C = volume-to-capacity ratio
Per the Traffic Study Policies and Procedures (LADOT, August 2014), a significant impact analysis was not conducted for the unsignalized Hoover Street & Sunset Place intersection.
Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.*

For the unsignalized intersection, Hoover Street and Sunset Place, the City of Los Angeles traffic analysis methodology and significance criteria are for signalized intersections only. As such, the City does not provide impact thresholds for unsignalized intersections. Rather, the LADOT Traffic Study Policies & Procedures states that “unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device.”⁵⁴ Traffic volumes and lane configurations, as

⁵⁴ LADOT, *Traffic Study Policies and Procedures, August 2014, page 15, website: http://ladot.lacity.org/stellent/groups/departments/@ladot_contributor/documents/contributor_web_content/lacityp_029521.pdf, accessed March 23, 2016.*

presented in Appendix B of the Traffic Study, were used to prepare the signal warrant analysis at the unsignalized intersection. As shown in Table III-33, the Hoover Street and Sunset Place intersection met the signal warrant thresholds under both AM and PM peak hours under the Existing with Project conditions. However, as discussed in Appendix F, the satisfaction of a traffic signal warrant does not in itself require the installation of a signal. Other factors relative to safety, traffic flow, signal spacing, and coordination should be considered. The Applicant shall work with LADOT to seek review and final approval of the traffic signal warrant analysis.⁵⁵ Additionally, as the City does not provide impact thresholds for unsignalized intersections, impacts related to the unsignalized intersection at Hoover Street and Sunset Place would be less than significant. Additionally, the Proposed Project would implement Mitigation Measure T-1, below, to ensure the Proposed Project would comply with the Transportation Demand Management (TDM) Ordinance (No. 167,700) by implementing a TDM Plan, which would further reduce impacts to less than significant levels. Therefore, the Proposed Project's impacts would be less than significant.

Table III-33
Existing with Project Conditions - Unsignalized Intersection Signal Warrant Analysis

Intersection	Peak Hour	Existing Signal Warrant Met	Existing with Project Signal Warrant Met
Hoover Street and Sunset Place	AM	No	Yes
	PM	No	Yes

Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.

Future with Project Intersection Level of Service

The intersection level of service analysis for the Future with Project conditions is summarized in Table III-34 for the AM and PM peak hours. This table also compares the LOS for without Project and with Project conditions, show the increase in V/C ratios at each intersection due to the Project, and identify if the increase constitutes a significant impact. As shown in Table III-34, the level of service at all 14 intersections are not anticipated to change with the addition of ambient traffic from the Proposed Project during the AM peak hour and any increase in V/C ratios would be less than significant. The addition of the Project traffic would cause the level of service to change at three of the fourteen intersections during the PM peak hour: at Commonwealth and Wilshire Boulevard (from LOS A to LOS B), Hoover Street and Olympic Boulevard (from LOS E to LOS F), and Alvarado Street and Wilshire Boulevard (from LOS B to LOS C). However, the increase in V/C ratio at the three study intersections would be below the threshold of significance and, therefore, impacts would be less than significant. Therefore, the Project would not cause any significant traffic impact in either the AM or PM peak hour for future with Project conditions.

⁵⁵ See Appendix F, at page 2 of the LADOT's Traffic Impact Assessment Letter of the Proposed Project dated May 17, 2016.

**Table III-34
Future with Project Condition - Level of Service Summary**

Intersection	Peak Hour	Future Without Project		Future with Project		Project Impact	Significant Impact?
		V/C	LOS	V/C	LOS		
1. Vermont Avenue and Wilshire Boulevard	AM	0.883	D	0.896	D	0.013	No
	PM	0.843	D	0.853	D	0.010	No
2. Vermont Avenue and 8 th Street	AM	0.784	C	0.788	C	0.004	No
	PM	0.759	C	0.767	C	0.008	No
3. Virgil Avenue and Wilshire Boulevard	AM	0.696	B	0.699	B	0.003	No
	PM	0.712	C	0.715	C	0.003	No
4. Commonwealth Avenue and 3 rd Street	AM	0.636	B	0.647	B	0.011	No
	PM	0.733	C	0.741	C	0.008	No
5. Commonwealth Avenue and 6 th Street	AM	0.656	B	0.665	B	0.009	No
	PM	0.605	B	0.613	B	0.008	No
6. Commonwealth and Wilshire Boulevard	AM	0.631	B	0.692	B	0.061	No
	PM	0.588	A	0.645	B	0.057	No
7. Hoover Street & Wilshire Boulevard	AM	0.743	C	0.757	C	0.014	No
	PM	0.727	C	0.741	C	0.014	No
8. Hoover Street and 7 th Street	AM	0.764	C	0.774	C	0.010	No
	PM	0.790	C	0.809	D	0.019	No
9. Hoover Street and 8 th Street	AM	0.963	E	0.969	E	0.006	No
	PM	1.026	F	1.035	F	0.009	No
10. Hoover Street and Olympic Boulevard	AM	0.977	E	0.980	E	0.003	No
	PM	0.996	E	1.003	F	0.007	No
11. Hoover Street and Pico Boulevard	AM	0.736	C	0.742	C	0.006	No
	PM	0.855	D	0.860	D	0.005	No
12. Rampart Boulevard and Wilshire Boulevard	AM	0.743	C	0.748	C	0.005	No
	PM	0.770	C	0.779	C	0.009	No
13. Alvarado Street and Wilshire Boulevard	AM	0.697	B	0.700	B	0.003	No
	PM	0.697	B	0.705	C	0.008	No
14. Alvarado Street and 8 th Street	AM	0.645	B	0.647	B	0.002	No
	PM	0.612	B	0.613	B	0.001	No

*LOS = level of service; V/C = volume-to-capacity ratio
Per the Traffic Study Policies and Procedures (LADOT, August 2014), a significant impact analysis was not conducted for the unsignalized Hoover Street & Sunset Place intersection.
Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.*

As discussed above, for the unsignalized intersection, Hoover Street and Sunset Place, the City of Los Angeles traffic analysis methodology and significance criteria are for signalized intersections only. As such, the City does not provide impact thresholds for unsignalized intersections. As shown in Table III-35, the Hoover Street and Sunset Place intersection met the signal warrant thresholds under both AM and PM peak hours under the Existing with Project conditions. However, as discussed in Appendix F, the satisfaction of a traffic signal warrant does not in itself require the installation of a signal. Other factors relative to safety, traffic flow, signal spacing, and coordination should be considered. The Applicant shall

work with LADOT to seek review and final approval of the traffic signal warrant analysis.⁵⁶ Additionally, as the City does not provide impact thresholds for unsignalized intersections, impacts related to the unsignalized intersection at Hoover Street and Sunset Place would be less than significant. In addition, the Proposed Project would implement Mitigation Measure T-1 to ensure the Proposed Project would comply with the Transportation Demand Management (TDM) Ordinance (No. 167,700) by implementing a TDM Plan. Implementation of Mitigation Measure T-1 would further reduce impacts to less than significant levels.

**Table III-35
Future with Project Conditions - Unsignalized Intersection Signal Warrant Analysis**

Intersection	Peak Hour	Future Without Project Signal Warrant Met	Future with Project Signal Warrant Met
Hoover Street and Sunset Place	AM	No	Yes
	PM	No	Yes

Source: 2900 Wilshire Project Draft Transportation Impact Analysis, Fehr & Peers, March 2016.

Transportation Demand Management (TDM) Program

A transportation demand management (TDM) program will be prepared as part of the project, even though mitigations would not be required as significant impacts were not identified at study area intersections. Several TDM program elements are project features proposed for implementation. Other TDM program elements would be developed in the preparation of a detailed TDM plan.

TDM Project Design Features

- Several project design features would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile, including:
 - Site Design – The site perimeter will be designed to encourage walking, biking, and transit. Amenities would include:
 - New sidewalks and street trees along the perimeter
 - Improved street and pedestrian lighting

Potential Additional TDM Program Elements

A TDM plan that will detail additional program elements beyond the site design features described above will be prepared. Additional TDM program elements could include unbundled parking, rideshare programs and discounted transit passes, although the exact measures to be implemented will be determined when the plan is prepared.

⁵⁶ See Appendix F, at page 2 of the LADOT's Traffic Impact Assessment Letter of the Proposed Project dated May 17, 2016.

- **Unbundled Parking** – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. The research literature shows that unbundled parking costs can reduce VMT by up to 13% (CAPCOA, 2010).
- **Rideshare Programs** – Rideshare programs typically include the provision of an on-site transit and rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. The research literature shows that rideshare programs can reduce commuting VMT by up to 15% (CAPCOA, 2010).
- **Transit Pass Discount Program** – Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk, and therefore at a discounted rate. Discounted passes are then sold to interested residents or employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. The research literature shows that discounted transit passes can reduce commuting VMT by up to 20% (CAPCOA, 2010).
- **Bicycle Parking and Bike Share Program** – As described in Chapter 7, the project will provide both long term and short term bicycle parking as well as bicycle showers and lockers for employees per the Los Angeles Municipal Code (LAMC). In addition, the project could provide complementary amenities such as a self-service bike repair area, and potentially a bike share service among residents, employees and visitors of the site.
- **Car Share Program** – The Proposed Project could allow space for a car share service within its proposed parking facilities. A car share program car rental where people rent cars for short periods of time, often by the hour. The programs are attractive to customers who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.
- **Upgrade to Transit Amenities** – The Proposed Project, in conjunction with Los Angeles Metropolitan Transportation Authority and Los Angeles Department of Transportation, could identify nearby bus- stops to upgrade stop location to further encourage the use of transit within the area.

Construction Traffic

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 Propose Project would require approximately 76,441 cy of soil to be exported off site. The haul route for the Proposed Project would be southbound on Hoover Street to the eastbound I-10 Freeway, to the

northbound I-110 Freeway, to the northbound SR-170 Freeway, to the northbound I-5 Freeway to the Sunshine Canyon Landfill. 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. Additionally according to the Traffic Study, construction of the Proposed Project is anticipated to involve two key phases for a total of approximately 32 months to complete: (1) demolition, off-site utilities, excavation; and (2) structural concrete work, building framing and finishes, including rough framing, exterior skin, and interior unit finishes. The Traffic Study concluded, on a peak construction activity day, a total of up to 328 daily passenger car equivalent (PCE) trips are estimated to occur under Phase 1, out of which 32 PCE trips would occur during each of the morning and evening peak hours. Phase 2 is estimated to generation a total of 390 daily PCE trips on a day with peak construction activity, out of which 58 PCE trips are estimated to occur during each of the morning and evening peak hours. 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 they 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. As concluded in the Traffic Impact Study (see Appendix F), impacts related to construction traffic were found to be less than significant. In addition, the peak construction activity will generate fewer daily and peak hour trips than are projected for the project once it is completed and occupied. While mitigation measures are not required to mitigate significant impacts, to be conservative a Construction Traffic Management Plan and Construction Worker Parking Plan should be implemented. Incorporation of these mitigation measures would further reduce temporary construction impacts to less than significant levels.

With respect to pedestrian access in the project area during construction of the Proposed Project, implementation of mitigation measure T-3 would ensure adequate and safe pedestrian circulation on adjacent sidewalks throughout all construction phases. This mitigation measure would ensure temporary sidewalk closures are avoided or minimized and that safe pedestrian access is provided around the site in accordance with LAMC Section 91.3306. Thus, due to the temporary nature of the construction activities, construction impacts would be less than significant with the incorporation of mitigation.

Mitigation Measures

T-1 Construction Traffic Management Plan

- A Construction Traffic Management Plan shall be developed by the contractor and approved by the City of Los Angeles to alleviate construction period impacts, which may include but is not limited to the following measures:
 - Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the project site will be off Sunset Place and Hoover Street.
 - Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload

for protracted periods of time.

- As parking lane and sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic and pedestrians around any such closures.
- If temporary travel lane closures are required, schedule closures to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. If temporary travel lane closures are anticipated, a worksite traffic control plan, approved by the City of Los Angeles, will be implemented to route traffic around any such lane closures.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

T-2 Construction Worker Parking Plan

- A Construction Worker Parking Plan shall be developed by the contractor and approved by the City of Los Angeles to ensure that the parking location requirements for construction workers will be strictly enforced. These could include but are not limited to the following measures:
 - During construction activities when construction worker parking cannot be accommodated on the project site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the project site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no parking is permitted on residential streets.

T-3 Construction Plan (Pedestrian Safety)

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks along Wilshire Boulevard, Hoover Street, and Sunset Place throughout all construction phases to the maximum extent feasible. Pursuant to LAMC Section 62.45, permits shall be obtained from the Bureau of Street Services prior to the closure of any adjacent sidewalks

and/or construction of protection fences or canopies within the public right-of-way. If temporary sidewalk closures are required, the sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

- Protection of pedestrian access shall be provided to LAMC Section 91.3306. The Applicant shall maintain adequate and safe pedestrian protection, including physical separation (i.e., utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closures or blockage, at all times.
- Covered walkways along Wilshire Boulevard, Hoover Street, and Sunset Place shall be provided where pedestrians are exposed to potential injury from falling objects.

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 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 local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. In addition, any CMP freeway monitoring segment where a project is expected to add 150 or more trips in any direction during the peak hours is to be analyzed. The study area analyzed in the Traffic Study includes the 14 intersections listed above. One of these intersections, Alvarado Street and Wilshire Boulevard, located east of the Project Site, is a Los Angeles County Congestion Management Plan (CMP) monitoring location. Based on the project trip distribution and trip generation, the Proposed Project is expected to add approximately 26 trips in the AM peak hour and 31 trips in the PM peak hour through this CMP arterial monitoring station. Thus, the Proposed Project is not expected to add enough new traffic to exceed the arterial analysis criteria of 50 vehicle trips at the Alvarado Street and Wilshire Boulevard intersection. Therefore, the Traffic Study concluded no further CMP analysis is required.

The CMP freeway monitoring stations closest to the Project Site include the US 101 Freeway south of Santa Monica Boulevard, US-101 Freeway at the I-110 Freeway interchange, and I-10 Freeway at Budlong Avenue. According to the trip generation estimates shown in Table 5 of the Traffic Study, the Proposed Project would result in an increase of 17 peak hour trips on the US 101 Freeway at Santa Monica Boulevard, an increase of 5 trips in the morning and 9 evening peak hour trips at the US 101 Freeway at the I-110 Freeway interchange monitoring station, and an increase of 8 peak hour trips to the I-10 Freeway at Budlong Avenue monitoring station. Therefore, the Proposed Project would not add 150 or more peak-hour trips to freeway mainline monitoring locations and no further CMP analysis is required. As such, the Proposed Project would not conflict with the adopted CMP and project 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. Current vehicular access to the Project Site is provided by one driveway along Wilshire Boulevard. The Proposed Project would include four driveways located on Commonwealth Avenue and Wilshire Boulevard, Hoover Street, and two driveways on Sunset Place. The Traffic Study conducted a level of service analysis for the Proposed Project's driveways. The driveway located at Commonwealth Avenue and Wilshire Boulevard, which is currently signalized and would serve as an inbound-only access point for the Project Site, would operate at LOS A during both peak hours under Existing with Project conditions and would operate at LOS B during both peak hours under Future with Project conditions. The other three driveway locations (Hoover Street, and two driveways on Sunset Place) will be unsignalized and stop-controlled and were analyzed using the Two-Way Stop methodology from 2010 Highway Capacity Manual (HCM). The Traffic Study concluded the three unsignalized driveway locations are projected to operate at acceptable LOS (LOS D or better) under Existing with Project and Future with Project conditions. As such, the Proposed Project would include new vehicular access driveways that would not conflict with pedestrian circulation and traffic. Additionally, pedestrian egress and ingress to the Proposed Project's residential component would be provided via the lobby entrance located on Sunset Place. Pedestrian access to the commercial component would be from the Wilshire Boulevard and Hoover Street frontages. The Proposed Project would also implement Mitigation Measures HAZ-1 and HAZ-2 during construction, which would further reduce the Project's impacts related to hazards due to design features or incompatible uses. 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 VII(h), 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. 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. The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Proposed Project would not interfere with any class I or class II bikeway systems or pedestrian facilities. The Traffic Study concluded since there would be no remaining uses on the site, the project construction would not block any vehicle or pedestrian access to other parcels fronting the construction area and impacts would be less than significant. Additionally, the sidewalk on the south side of Sunset Place and east side of Hoover Street would be open and pedestrians are anticipated to use this as a detour throughout construction. As such, the temporary impacts to pedestrians during construction would be less than significant. During the construction, implementation of mitigation measure T-3 would ensure the Applicant maintains safe pedestrian access around the Project Site in accordance with LAMC Section 91.3306. Since the Proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, the Proposed Project would have no impact on such programs.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 91 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Wilshire Community Plan Area. As noted in Table III-34, above, 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. 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 Treatment Plant (HTP). The HTP 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).⁵⁷ 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.⁵⁸

On September 7, 2016 the City of Los Angeles Department of Water and Power Board of Water and Power Commissioners adopted the Water Supply Assessment for the Proposed Project, finding that the total additional water demand for the Proposed Project is 120 acre feet per year. The LADWP concluded that this additional demand has been accounted for in the City's overall total demand projections in the 2015 UWMP using a service area-wide approach that does not rely on individual development demand.⁵⁹ Based on the Planning Department's determination that the Proposed Project is consistent with the demographic forecasts for the City from the 2012 SCAG RTP, LADWP finds that Proposed Project water demand is included in the City's 2015 UWMP water demand projection. Furthermore, the 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040. LADWP therefore concludes that the 120 AFY increase in the total water demand for the Proposed Project falls within the available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2040, as described in LADWP's 2015 UWMP. LADWP finds it will be able to meet the proposed water demand of Proposed Project, as well as existing and planned future water demands of its service area.⁶⁰

As shown in Table III-36 below, the Proposed Project would generate a net increase in water demand of approximately 103,839 gallons per day (gpd) of water, or approximately 116 acre feet per year. This estimate is slightly less than the estimated provided for in the Project's Water Supply Assessment due to a change in the range of dwelling unit types (*i.e., studios, 1-BR, 2-BR, etc.*). Because the Proposed Project's water demand falls within the available and projected water supplies for the City, no new or expanded water treatment facilities would be required as a result of the Proposed Project. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Although no system upgrades are anticipated at this time, the local water system will 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

⁵⁷ Los Angeles Department of Water and Power, *Water, Facts & History, The Story of the Los Angeles Aqueduct*, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-losangelesaqueduct/a-w-laa-factsandhistory?_adf.ctrl-state=k5t6w2ihy_4&_afzLoop=63926375209828, accessed March 2016.

⁵⁸ Los Angeles Department of Water and Power, website: <http://www.ladwp.com/>, accessed March 2016.

⁵⁹ See *Water Supply Assessment for the 2900 Wilshire Boulevard Project contained in Appendix H to this IS/MND* (at page 45).

⁶⁰ *Ibid.*

**Table III-36
Proposed Project Estimated Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) ^a	Base Demand	Required Ordinances Water Savings	Total Water Demand (gpd)	
Existing Uses						
Two Commercial Buildings	4,488 sf	--	--	--	1,047 ^b	
Proposed Project						
Residential Units (644 total du)ⁱ						
Studio	227 du	75 gpd/du	17,025	--	--	
One Bedroom	293 du	110 gpd/du	32,230	--	--	
Two Bedroom	124 du	150 gpd/du	18,600	--	--	
Base Demand Adjustment (Residential) ^c	--	--	8,762	--	--	
Residential Units Total			76,617	19,009	57,608 ⁱ	
Residential Common						
Community / Cultural Area ^d	53,066 sf	0.05 gpd/du	2,653	--	--	
Pool	1,925 sf		181	--	--	
Residential Common Total			2,834	646	2,188	
Commercial^c						
Ground-floor Retail	10,000 sf	0.025 gpd/sf	250	--	--	
Restaurant	242 seats	30 gpd/seat	7,260	--	--	
Base Demand Adjustment (Commercial) ^c	--	--	138	--	--	
Commercial Total			7,648	1,873	5,775	
Landscaped Open Space^e	14,391 sf	--	1,344	727	617	
Parking Structure (enclosed)^f	441,771 sf	0.02 gpd/sf	290	0	290	
Cooling Tower^g	1,400 ton	35.64 gpd/ton	49,896	9,979	39,917	
Total Project Water Demand:			142,254	32,234	106,395	
					<i>Less Existing Water Demand:</i>	1,047
					<i>Less Additional Conservation^h:</i>	1,509
NET Additional Water Demand:					103,839	

Notes: sf = square feet; du = dwelling units, gpd: gallons per day

^a Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at <http://www.lacitysan.org/fmd/odf/sfscfeerates.pdf>.

^b The existing uses' water demand is based on the LADWP billing data.

^c Base Demand Adjustment is the estimated ordinance savings already accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.

^d Community / Cultural Area is assumed to have water use similar to lobby of retail area.

^e Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.

^f Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates tables, and 12 times/year cleaning assumption.

^g Operating 24 hours/day, 365 days/year, 6 cycles of concentration and 55% of chiller capacity.

^h Water conservation due to additional conservation commitments agreed by the Applicant. See Table II in Appendix H of this IS/MND.

ⁱ The Proposed Project's unit mix differs from the unit mix in the Water Supply Assessment included as Appendix H of this IS/MND. However, the water demand generated by the Proposed Project's unit mix is less than the water demand generated by the unit mix in the Water Supply Assessment. Therefore, the Proposed Project is within the scope and impacts discussed in the Water Supply Assessment.

Source: Los Angeles Department of Water and Power, Water Supply Assessment, October 2016. See Appendix H of this IS/MND.

improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

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 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.

The Los Angeles Bureau of Sanitation provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP).⁶¹ The Hyperion Treatment Plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (mgd) and peak wet weather flow of 800 mgd.⁶² As shown in Table III-37, the Proposed Project would generate a net increase of approximately 84,661 gpd of wastewater, representing a fraction of one percent of the available capacity. Based on the configuration of the sewer lines serving the Project Site, the Proposed Project's sewer flows may be routed to the lines under Wilshire Boulevard and Sunset Place.⁶³ In accordance with the *L.A. CEQA Thresholds Guide*, the estimated sewer flows were based on the sewerage generation factors for residential and commercial categories (City of Los Angeles, Bureau of Sanitation, 1996). Thus, the HTP would have adequate capacity to serve the Project Site. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

⁶¹ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=k0dvwf112_4&_afLoop=20587311382317713#!, accessed March 2016.

⁶² City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=k0dvwf112_4&_afLoop=20587311382317713#!, accessed March 2016.

⁶³ City of Los Angeles Bureau of Engineering, Navigate LA, website: <http://navigatela.lacity.org/>, accessed: March 2016.

**Table III-37
Proposed Project Estimated Wastewater Generation**

Type of Use	Size	Wastewater Generation Rate (gpd/unit) ^a	Total Wastewater Generation (gpd)
Existing Uses			
Two Commercial Buildings	4,488 sf	0.08 gpd/sf	359
Proposed Project			
Residential Units (644 total du)			
Studio	227 du	80 gpd/du	18,160
One Bedroom	293 du	120 gpd/du	35,160
Two Bedroom	124 du	160 gpd/du	19,840
Commercial^c			
Ground-floor Retail	10,000 sf	0.08 gpd/sf	800
Restaurant	367 seats	30 gpd/seat ^b	11,010
Total Project Wastewater Generation:			84,970
<i>Less Existing Wastewater Generation:</i>			<i>359</i>
NET TOTAL Wastewater Generation:			84,661
<p><i>Notes: sf = square feet; du = dwelling units, gpd: gallons per day</i></p> <p>^a <i>L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12.</i></p> <p>^b <i>Restaurant assumes 15 sf/seat. Based on full service indoor restaurant for conservative estimate. California Airport Land Use Planning Handbook (2002), Appendix C, Occupancy Levels – California Building Code.</i></p> <p>^c <i>The Proposed Project includes 10,000 square feet of ground floor neighborhood-serving retail and a 5,500 square foot (367 seat) restaurant.</i></p> <p><i>Parker Environmental Consultants, 2016.</i></p>			

- 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 Section 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 ¼-inch of rainfall in a 24-hour period. The Proposed Project Site is currently developed as a surface parking lot and two commercial buildings. Runoff from the Project Site currently is and would continue to be directed towards the existing storm drain that currently occupies the Project Site as well as existing storm drains in the Project vicinity. As stated previously in response to Checklist Question IX(a), the Project shall comply with the LID Plan, Standard Urban Stormwater Mitigation Plan (SUSMP) and/or the site-specific mitigation plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. 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 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. 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 103,839 gallons per day. The Project is 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 2016-2040 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, pursuant to LAMC Section 122.03(a), the Proposed Project is required to utilize water saving devices including, but not limited to, urinals equipped with flush-o-meter valves, which flush with a maximum of 1.28 gallons, which would further reduce impacts associated with this issue to a level that is less than significant. Environmental impacts would further be reduced by the Proposed Project's required implementation of all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use. Furthermore, the Proposed Project would be required to comply with Ordinance No. 170,978 (Water Management Ordinance), 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). 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, and no further mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project and 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 existing and other planned future uses of the LADWP system through the 25-year water demand growth projection. 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 contributes to population and housing growth in Wilshire CPA beyond what was projected for 2010. Nevertheless, the Proposed Project's growth is consistent with SCAG's growth projections for the 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 Project are accounted for in the 2015 Urban Water Management Plan.

Development of the Proposed Project in conjunction with the 91 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 related projects cumulative water demand can be seen in Table III-38, below. As shown in Table III-38, the net water demand of the 91 related projects and the Proposed Project totals 7,175,596.1 gpd or 7.18 mgd. Of the 50 to 150 mgd available water treatment capacity in LAAFP, the cumulative demand of 7.18 mgd would not significantly reduce its capacity. As such, cumulative impacts with respect to water demand would be less than significant.

- 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

**Table III-38
Projected Cumulative Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) ^a	Total Water Demand (gpd)
Related Projects			
Dwelling Units ^b	27,638 du	192 gpd/du	5,306,496
Senior Housing ^c	97 du	144 gpd/du	13,968
Bar and Cocktail Area	5,000 sf	0.6 gpd/sf	3,000
Hotel	1,411.74 room ^e	156 gpd/room	220,231.3
Library	15,000 sf	0.096 gpd/sf	1,440
Medical Office	207,833 sf	0.3 gpd/sf	62,350
Office	3,540,768 sf	0.18 gpd/sf	637,338.4
Fast Food Restaurant – Indoor ^d	833.33 seat	24 gpd/seat	20,000
Restaurant Full Service – Indoor ^d	15,534.13 seat	36 gpd/seat	559,228.8
Retail	2,045,843 sf	0.096 gpd/sf	196,401
Schools (includes day care, elementary school and middle school)	3,797 stu	9.6 gpd/student	36,451
School: High School	500 stu	14.4 gpd/student	7,200
Theater: Cinema	1,594.3 seat	4.8 gpd/seat	7,652.6
Total Related Projects Water Demand:			7,071,757.1
Total Project Water Demand:			103,839
TOTAL CUMULATIVE:			7,175,596.1
Project % of Cumulative:			1.4%
<p><i>Notes: sf = square feet; du = dwelling units, gpd = gallons per day, stu = student Uses not listed are estimated by the closest type of use available in the table.</i></p> <p>^a L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12. Consumption Rates based on 120% of the City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, March 20, 2002.</p> <p>^b Dwelling units include condominiums and multi-family residential units. Consumption rate was based on 2 bedrooms per unit as a conservative estimate.</p> <p>^c Senior Apartments assume one bedroom per dwelling unit.</p> <p>^d Fast-food and Restaurant uses assume indoor seating for conservative estimate.</p> <p>^e Hotel rooms assumed to be 575 sf. Based on 811,750 hotel square footage, 1,411.73 rooms were calculated. Restaurant assumes 15 sf/seat. Theaters/Cinemas/Event Space assumes 15 sf/seat. Schools assume 35 sf/child. Source: California Airport Land Use Planning Handbook (2002), Appendix C, Occupancy Levels –California Building Code Source: Parker Environmental Consultants, 2016.</p>			

General Plan and its elements. As stated in Checklist Question XVII(b), above, the sewage flow would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Proposed Project.⁶⁴ Therefore, impacts would be less than significant.

⁶⁴ City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://www.lasewers.org/treatment_plants/hyperion/index.htm, accessed September 2015.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 91 related projects would further increase regional demands on HTP's capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of HTP's service to the City of Los Angeles. The related projects cumulative wastewater demand can be seen in Table III-39. As shown in Table III-39, the net wastewater demand of the 91 related projects and the Proposed Project totals 5,977,793 gpd or 5.98 mgd. Of the 88 mgd available in HTP, the cumulative demand of 5.98 mgd accounts for almost 6.8% 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.

**Table III-39
Projected Cumulative Wastewater Generation**

Type of Use	Size	Wastewater Generation Rate (gpd/unit) ^a	Total Wastewater Generation (gpd)
Related Projects			
Dwelling Units ^b	27,638 du	160 gpd/du	4,422,080
Senior Housing ^c	97 du	120 gpd/du	11,640
Bar and Cocktail Area	5,000 sf	0.5 gpd/sf	2,500
Hotel	1,411.74 room ^e	130 gpd/room	183,526.1
Library	15,000 sf	0.08 gpd/sf	1,200
Medical Office	207,833 sf	0.25 gpd/sf	51,959
Office	3,540,768 sf	0.15 gpd/sf	531,115.2
Fast Food Restaurant – Indoor ^d	833.33 seat	20 gpd/seat	16,666.7
Restaurant Full Service – Indoor ^d	15,534.13 seat	30 gpd/seat	466,024
Retail	2,045,843 sf	0.08 gpd/sf	163,667.4
Schools (includes day care, elementary school and middle school)	3,797 stu	8 gpd/stu	30,376
School: High School	500 stu	12 gpd/stu	6,000
Theater: Cinema	1,594.3 seat	4 gpd/seat	6,377.1
Total Related Projects Wastewater Generation:			5,893,132
Total Project Wastewater Generation:			84,661
TOTAL CUMULATIVE:			5,977,793
Project % of Cumulative:			1.4%

Notes:

sf = square feet; du = dwelling units, gpd = gallons per day, emp = employee, stu = student

Uses not listed are estimated by the closest type of use available in the table.

^a *L.A. CEQA Thresholds Guide (2006), Exhibit M.2-12.*

^b *Dwelling units include condominiums and multi-family residential units. Consumption rate was based on 2 bedrooms per unit as a conservative estimate.*

^c *Senior Apartments assume one bedroom per dwelling unit.*

^d *Fast-food and Restaurant uses assume indoor seating for conservative estimate.*

^e *Hotel rooms assumed to be 575 sf. Based on 811,750 hotel square footage, 1,411.73 rooms were calculated.*

Restaurant assumes 15 sf/seat. Theaters/Cinemas/Event Space assumes 15 sf/seat. Schools assume 35 sf/child. Source: California Airport Land Use Planning Handbook (2002), Appendix C, Occupancy Levels –California Building Code.

Source: Parker Environmental Consultants, 2016.

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, or 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 either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. State law currently requires at least 50% solid waste diversion and establishes a state-wide goal of 75% diversion by 2020. 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. 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.

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 64.68 million tons. Chiquita Canyon Landfill currently has a remaining capacity of 1.83 million tons.

Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted capacity of approximately 66.51 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 23 years, and the Chiquita Canyon Landfill has an estimated remaining life of 2 years.⁶⁵ An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 48,114,000 tons (a 43-year life expectancy based on 2014 average daily disposal of 3,558 tons per day or 15 years based on the maximum permitted rate of disposal of 10,000 tons per day).⁶⁶

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. As shown in Table III-40 below, the development of 647,014 square feet of building area, including 642,014 of residential floor area and 15,500 square feet of retail/restaurant floor area, it is estimated that the construction of the Proposed Project would generate approximately 1,783.9 tons of debris during the demolition and construction process.⁶⁷ Under the requirements of the hauler’s AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris will be delivered to a Certified Construction and Demolition Waste Processing Facility.

**Table III-40
Estimated Construction and Demolition Debris**

Construction Activity	Size	Rate ^a (lbs./sf)	Generated Waste (tons)
Demolition			
Two Commercial Buildings	4,488 sf	155 lbs/sf	347.8
Total Project Demolition Debris Generation:			347.8
Construction			
Multi-Family Residential	642,014 sf	4.38 lbs/sf	1,406
Ground-floor Retail / Restaurant ^b	15,500 sf	3.89 lbs/sf	30.1
Total Project Construction Debris Generation:			1,436.1
Proposed Project NET TOTAL:			1,783.9
<i>Notes: sf = square feet; lbs = pounds</i> ^a USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States</i> , July 1998. ^b <i>The Proposed Project includes 10,000 square feet of ground floor neighborhood-serving retail and a 5,500 square foot restaurant.</i> Source: Parker Environmental Consultants, 2016.			

As shown in Table III-41, Estimated Operational Solid Waste Generation, the Proposed Project’s net generation during operation of the Proposed Project would be approximately 8,065.7 pounds per day. This estimate is conservative, as it does not factor in any recycling or waste diversion programs. The

⁶⁵ County of Los Angeles Department of Public Works, 2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, pages 31 and 32, December 2015.

⁶⁶ County of Los Angeles Department of Public Works, 2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, page 60, December 2015.

⁶⁷ The Proposed Project includes 13,200 square feet of ground floor retail. For a conservative analysis, the Proposed Project’s estimated construction and demolition debris analyzes 10,000 square feet of ground floor retail and a 5,500 square foot restaurant.

Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills, and the Project impacts to regional landfill capacity would be less than significant. The Proposed Project would also be required to comply with the following code compliance measures. In compliance with the LAMC, the proposed Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals. Additionally, in order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, 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 through 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. In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation. Furthermore, in compliance with AB341, 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 AB341. Implementation of the above code compliance measures would further reduce the Project's impacts on solid waste generation.

**Table III-41
Expected Operational Solid Waste Generation**

Type of Use	Size	Solid Waste Generation Rate ^a (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
Two Commercial Buildings (4,488 sf)	8 emp ^b	10.53 lbs/emp/day	84.2
Proposed Project			
Multi-Family Residential	644 du	12.23 lbs/du/day	7,876.1
Retail/Restaurant (15,500 sf) ^c	26 emp ^b	10.53 lbs/empl/day	273.8
Total Project Solid Waste Generation:			8,149.9
<i>Less Existing Uses:</i>			<i>84.2</i>
NET TOTAL Solid Waste Generation:			8,065.7

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 588 square feet of retail/commercial space.

^c The Proposed Project includes 10,000 square feet of ground floor neighborhood-serving retail and a 5,500 square foot restaurant.

Source: Parker Environmental Consultants, 2016.

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 commercial 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.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the 91 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-42 shows the cumulative solid waste generation in pounds per day.

**Table III-42
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	27,638 du	12.23 lbs/du/day	338,012.7
Senior Housing	97 du	12.23 lbs/du/day	1,186.3
Retail / Commercial (2,370,346 sf) ^c	6,189 emp	10.53 lbs/employee/day	65,170.2
Medical Office	207,833 sf	0.007 lbs/sf/day	1,454.8
Office	3,547,770 sf	0.006 lbs/sf/day	21,286.6
Hotel	1,411.74 room ^d	2 lbs/room/day	2,823.5
Schools	77,640 sf	0.006 lbs/sf/day	465.8
Related Projects Total:			92,387.2
Proposed Project Net Total:			8,065.7
CUMULATIVE TOTAL:			100,452.9
Project % of Cumulative			8.0%

*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 and multi-family residential units.
^c Generation rates are based on 1 employee per 383 square feet of retail/commercial.
^d Hotel rooms assumed to be 575 sf. Based on 811,750 hotel square footage, 1,411.73 rooms were calculated.
 Theaters and restaurant space assume 15sf/seat. Schools assume 20 sf/student. Day cares assume 35 sf/child. California Airport Land Use Planning Handbook (2002) Appendix C, Occupancy Levels –California Building Code.
 Conversions of floor area per occupant based on California Building Code (2013), Ch.10, Table 1004.1.2.
 Source: Parker Environmental Consultants, 2016.*

The cumulative operational solid waste generation of the related projects and Proposed Project would contribute approximately 100,452.9 pounds of solid waste per day (18,332.7 tons of solid waste per year)⁶⁸, 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 66.51 million tons. While in the short-term adequate landfill capacity exists to accommodate solid waste generated by the Proposed Project, in the future there will 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.

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 1989.⁶⁹ 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, black 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 will continue to decrease as it increases waste diversion rates in accordance with City goals. Therefore, the Project's contribution to cumulative solid waste impacts will be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

XVIII. 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**

⁶⁸ *Tons of solid waste per year were calculated by multiplying the solid waste generated in pounds per day from Table III-42 by 365 days and converting it to tons.*

⁶⁹ *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June 14 2005.*

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?

No Impact. 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 provided the mitigation measures listed above are implemented. 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, no 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 other 91 related projects in the area of the Project Site, 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, 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?

Potentially Significant Impact Unless Mitigation Incorporated. 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 associated with hazards and hazardous materials, hydrology and water quality, land use compatibility, noise and vibration, public services, and traffic (for a list of applicable mitigation measures, see Summary of Mitigation Measures in the Initial Study Checklist Form of this IS/MND).

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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
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 (2007)
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
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	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
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
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
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-10	Santa Monica Freeway
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
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

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
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 ₂ O	nitrous oxide
NAAQS	National ambient air quality standards
NFRAP	No Further Remedial Action Planned Sites
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	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
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
RTP	Regional Transportation Plan
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
SO _x	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
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	stormwater management plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
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
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m ³	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System