

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 1
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PROJECT TITLE 1201 N. Broadway	CASE NO. ENV-2016-4076-MND
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PROJECT LOCATION
1201 N. Broadway Avenue, Los Angeles, CA 90012

PROJECT DESCRIPTION
See Attachment A, Project Description.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Johnson Fain, 1201 N. Broadway Avenue, Los Angeles, CA 90012

FINDING:
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments 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 THIS FORM	TITLE	TELEPHONE NUMBER
HEATHER BLEEMERS	CITY PLANNER	(213) 978-0092

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		5/20/2017

SUMMARY OF PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Aesthetics

PDF AES-1: The Applicant shall provide and maintain a construction fence for safety and to screen views to the project site during construction to the extent feasible. The fence shall be located along the perimeters of the project site with a minimum height of 8 feet. The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

PDF AES-2: Outdoor lighting shall be designed, shielded and directed toward the areas of the project site to be lit to limit spill-over onto adjacent residential uses.

PDF AES-3: The exterior of the proposed building shall be constructed of materials such as, but not limited to, high-performance low reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would avoid substantial glare and reflected heat.

No mitigation measures are required.

Agriculture and Forestry Resources

No mitigation measures are required.

Air Quality

MM AIR-1 Construction Measures: The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 final off-road emissions standards for equipment rated at greater than 50 horsepower (hp) during project construction. To the extent possible, pole power will be made available for use with electric tools, equipment, lighting, etc. Tower cranes shall be electric-powered instead of diesel. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

Biological Resources

MM BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce potential impacts to migratory and/or nesting bird species to below a level of significance.

Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Building and Safety. If any active nests are detected, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

MM BIO-2: Tree Removal (Non-Protected Trees): Environmental impacts from project implementation may result due to the loss of significant trees on the site. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- 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.

MM BIO-3: Tree Removal (Public Right-of-Way):

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.

- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

Cultural Resources

MM CUL-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The qualified archaeologist shall provide technical and compliance oversight of all work as it relates to archaeological resources, shall attend the project kick-off meeting and project progress meetings on a regular basis, and shall report to the site in the event potential archaeological resources are encountered.

MM CUL-2: The qualified archaeologist shall conduct construction worker cultural resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of archaeological resources that could be encountered within the project site, working with on-site cultural resource monitors, and the procedures to be followed if cultural resources are found. Documentation shall be retained demonstrating that all construction personnel attended the training.

MM CUL-3: Because of the potential to encounter archaeological resources exists for the proposed project, it is required that a Cultural Resources Monitoring and Mitigation and Treatment Plan be developed prior to the issuance of a grading permit for the project. The plan will outline and expand upon construction monitoring procedures, as well as a cultural resources treatment plan, in the event that cultural resources are encountered. As part of the Cultural Resources Monitoring and Mitigation and Treatment Plan, the construction contractor will use a qualified archaeological monitor, working under the supervision of a qualified archaeological Principal Investigator during ground disturbing activities including, but not limited to, demolition of foundations and footings, trenching, grading, and over excavation within the project area. Ancillary construction which may occur within Bishops Road and/or North Broadway to change the curb and gutter as well as any utilities work for the project will be monitored. The monitor will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper handling of such resources. The archaeological monitor will have the authority to redirect construction equipment in the event potential archaeological resources are encountered. In the event archaeological resources are encountered, the client will be notified immediately and work in the vicinity of the discovery will halt until appropriate treatment of the resource, as outlined in the treatment plan is determined by the qualified archaeological Principal Investigator in accordance with the provisions of CEQA.

The treatment plan will compile existing information, discuss the types of resources which may be encountered, and provide research themes and treatment approaches in order to avoid or mitigate significant impacts to potentially significant archaeological resources as determined to possibly within the project area including water conveyance systems, features related to Calvary Cemetery, and historic residential features. The treatment plan will also outline protocols to follow for unanticipated discoveries.

MM CUL-4: If any prehistoric archaeological sites are encountered within the project area, or human remains encountered, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources prior to the implementation of any treatment of the resource.

MM CULT-5: The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and in accordance with the Cultural Resources Monitoring and Mitigation and Treatment Plan. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

MM CULT-6: If human remains are encountered during implementation of the project, 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 PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

MM PAL-1: A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide

technical and compliance oversight of all work as it relates to paleontological resources, shall attend the project kick-off meeting and project progress meetings on a regular basis, and shall report to the site in the event potential paleontological resources are encountered.

MM PAL-2: The Qualified paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. Documentation shall be retained demonstrating that all construction personnel attended the training.

MM PAL-3: Full-time paleontological resources monitoring shall be conducted for all ground disturbing activities occurring in older Quaternary alluvium and the Puente Formation which in this area is estimated to occur at or below approximately 15 feet in depth. The Qualified paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (or cross-trained archaeological/paleontological monitor) under the direction of the qualified paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort.

MM PAL-4: If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it should be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.

Geology and Soils

No mitigation measures are required.

Greenhouse Gas Emissions

No mitigation measures are required.

Hazards and Hazardous Materials

MM HAZ-1 Health and Safety Plan: The project applicant shall require the construction contractor to retain a qualified environmental professional to prepare and implement a site-specific Health and Safety Plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 CCR Title 8, Section

5192). The Health and Safety Plan shall include all required measures to protect construction workers and the general public potentially exposed to hazardous materials by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction area and to reduce hazards outside of the construction area. If prescribed contaminant exposure levels are exceeded, personal protective equipment shall be required for workers in accordance with state and federal regulations. The plan shall include designated personnel responsible for implementation of the Health and Safety Plan. Submittal of the Health and Safety Plan to the project applicant shall not be construed as approval of the adequacy of the contractor's health and safety professional, the contractor's plan, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work.

MM HAZ-2 Soil and Groundwater Management Plan: The project applicant shall require the construction contractor to prepare and implement a Soil and Groundwater Management Plan, subject to review by the project applicant, that specifies the method for handling and disposal of contaminated soil and groundwater prior to demolition, excavation, and construction activities. The plan shall include all necessary procedures to ensure that excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information:

- Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling.
- Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils.

Detailed control measures for use and storage of hazardous materials to prevent the release of pollutants to the environment, and emergency procedures for the containment and cleanup of accidental releases of hazardous materials to minimize the impacts of any such release. These procedures shall also include reporting requirements in the event of a reportable spill or other emergency incident. At a minimum, the project applicant or its contractor shall notify applicable agencies.

Hydrology and Water Quality

No mitigation measures are required.

Land Use and Planning

No mitigation measures are required.

Mineral Resources

No mitigation measures are required.

Noise

MM NOISE-1: Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.

MM NOISE-3: Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously, a maximum of 3 pieces within 50 feet from residential uses.

MM NOISE-4: Temporary noise barriers shall be used to block the line-of-site between construction equipment and residences directly adjacent to the project site on the north at all times during project construction. Noise barriers shall be a minimum of 15-feet tall along the west and north boundaries and a minimum of 8-feet tall along the east boundary of the project site.

MM NOISE-5: Heavy equipment shall not be used within 50 feet of the neighboring residential structures. Heavy equipment is defined as equipment with an engine size of 600 horsepower or greater and includes large dozers, large excavators, and large loaders. If such proximate construction is required, alternative equipment and methods such as small bulldozers with an engine size of less than 300 horsepower shall be used to ensure that vibration effects on adjacent residential uses do not exceed vibration velocities of 0.035 inches per second.

Population and Housing

No mitigation measures are required.

Public Services

No mitigation measures are required.

Recreation

No mitigation measures are required.

Transportation and Traffic

PDF-TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.

- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to N. Broadway Avenue and Bishops Road, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the project site's N. Broadway Avenue driveway.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the project site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address the temporary relocation of the bus stop located at the northwest corner of N. Broadway Avenue & Bishops Road.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

PDF-TRAF-2: The applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- The applicant shall keep sidewalks open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

No mitigation measures are required.

Tribal Cultural Resources

No mitigation measures are required.

Utilities and Service Systems

No mitigation measures are required.

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND CHECKLIST
 (Article IV B City CEQA Guidelines)

LEAD CITY AGENCY Department of City Planning	COUNCIL DISTRICT 1	DATE April 20, 2017
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RESPONSIBLE AGENCIES
 City of Los Angeles Department of City Planning, Los Angeles Regional Water Quality Control Board, South Coast Air Quality Management District (SCAQMD), Los Angeles Building and Safety Department, Los Angeles Department of Water and Power (Board of Water and Power Commissioners), Los Angeles Board of Public Works, Los Angeles Department of Transportation

PROJECT TITLE/NO. 1201 N. Broadway	CASE NO. ENV-2016-406-MND
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PREVIOUS ACTIONS CASE NO.	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.
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PROJECT DESCRIPTION:

The demolition of existing improvements and the construction, use, and maintenance of a mixed-use, seven-story building with a total floor area of 89,434 square feet (sf) consisting of 118 residential units and 8,795 square feet of ground floor office/commercial uses. The proposed structure would be approximately 78 feet and 6 inches in height and would include a ground level with an approximately 971 square-foot lobby, residential units on Levels 2 through 7, and approximately 17,457 square feet of common and private open space and amenities for use by residents. The proposed project would provide 170 parking spaces, including 19 parking spaces of office/commercial uses and 151 residential parking spaces, in a two-level subterranean garage. The proposed project would also include a total of 156 bicycle parking spaces, including 133 long-term residential bicycle parking spaces, 13 short-term residential bicycle parking spaces, and 10 commercial bicycle parking spaces. The development would have a floor area ratio of approximately 2.99:1. The Applicant requests a Site Plan Review, Vesting Tentative Tract Map, and other approvals, to permit development of the project. The project will include the export of 32,100 cubic yards of earth from the project site and will include the removal of two non-protected trees from the project site. The applicant will be required to replace all removed trees to the satisfaction of the Board of Public Works, Urban Forestry Division.

ENVIRONMENTAL SETTING:

The project site is located in the northern end of the Central City North Community Plan Area. The project site is located north of Downtown Los Angeles, in the northerly fringe of the Chinatown neighborhood. The project site is located at the intersection of North Broadway and Bishops Road. Chinatown’s Central Business District lies southwest of the project site, and the Gold Line Chinatown Station right-of-way is located to the southeast of the project site. The project site is an irregularly-shaped parcel extending from North Broadway on the southeast to Bishops Road to the southwest. To the northwest, it is bordered by six parcels -comprised of three single-family residences. The project site is bordered to the northeast by commercial/office uses.

PROJECT LOCATION:

The project site is located at 1201 North Broadway Avenue and is located in an urbanized area with a mixture of low-rise commercial, retail, institutional, and residential uses. Immediately north of the project site are two 2-story multi-family residences and a single-family residence. Further north, single-family residences line the north side of Savoy Street. Across North Broadway Avenue to the south is the Los Angeles State Historic Park. The Gold Line right-of-way is located southeast of the project site and runs parallel to North Broadway Avenue. Existing developments abutting the project site to the east includes a multi-story commercial building occupied by an antique furniture store. Existing developments across Bishops Road to the west include surface parking lots, the private Cathedral High School, and St. Peter’s Italian Church.

The project site is served by a variety of transit options including one Los Angeles Department of Transportation (LADOT) DASH Lincoln Heights/Chinatown line, with stops at N. Broadway and Bishops Road, as well as multiple stops along Broadway. Metro Bus Routes 45-Harbor Freeway, 83 Downtown LA-Main-Venice, and 28 Century City via Downtown LA, also service the project vicinity with a stop adjacent to the project site at the corner of North Broadway Avenue and Bishops Road. The Metro Gold Line Light Rail Chinatown Station is located 0.5 miles south of the project site, and provides direct linkages to East Los Angeles and Pasadena/Azusa, as wells as other lines within the Metro Rail system. Union Station, located approximately 0.75 miles south of the project site, is a major hub for public transportation, including Amtrak, Metrolink, and bus lines providing national, regional, and local access.

For further discussion, see Attachment A, Project Description.

PLANNING DISTRICT Central City North Community Plan		STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED
EXISTING ZONING C2-2D (Commercial)	MAX. DENSITY ZONING 159 Dwelling Units (R5 Density per 12.22-A.18)	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
PLANNED LAND USE & ZONE Regional Commercial/C2-2D	MAX. DENSITY PLAN 159 Dwelling Units (R5 Density)	
SURROUNDING LAND USES See Attachment A, Project Description	PROJECT DENSITY 2.99:1; 118 Dwelling Units	



DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

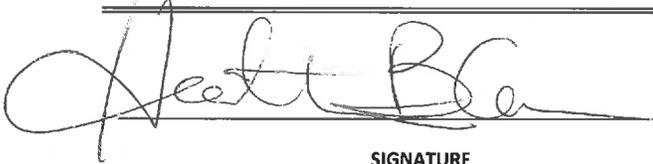
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



SIGNATURE

CITY PLANNER

TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

- 1) The significance criteria or threshold, if any, used to evaluate each question; and
- 2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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



BACKGROUND

PROPONENT NAME Fain Broadway, LLC and Johnson Broadway, LLC	PHONE NUMBER
PROPONENT ADDRESS 1201 North Broadway Avenue, Los Angeles, CA 90012	
AGENCY REQUIRING CHECKLIST Department of City Planning	DATE SUBMITTED April 20, 2017
PROPOSAL NAME (If Applicable) 1201 N. Broadway	

 **ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY. Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IV. BIOLOGICAL RESOURCES. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	<input 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 §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input 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. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input 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. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other governmental services (including roads)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. RECREATION.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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/CIRCULATION. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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"/>
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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"/>
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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 checked="" type="checkbox"/>	<input type="checkbox"/>
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e. Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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"/>
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XVII. TRIBAL CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVIII. UTILITIES. Would the project:

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

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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

PREPARED BY	TITLE	TELEPHONE #	DATE
Anne Collins-Doehne ESA PCR 80 South Lake Avenue, Suite 570 Pasadena, CA 91101	Associate Principal	(626) 204-6170	April 20, 2017

ATTACHMENT A

Project Description

A. Introduction

The applicant proposes to demolish the existing improvements on the project site in conjunction with the development of a mixed-use building (proposed project or project) with a total floor area of 89,434 square feet (sf) and housing 118 residential units and 8,795 sf of ground floor office/commercial uses on the 0.73-acre site. The proposed building would be seven stories and approximately 78 feet, 6 inches in height above finished grade and would include a ground level with an approximately 971-sf lobby and commercial space; 118 residential units on Levels 2 through 7; and approximately 17,457 sf of common and private open space and amenities for use by residents. The proposed project would provide 170 parking spaces, including 19 parking spaces for office/commercial uses and 151 residential parking spaces, in a two-level subterranean structure. The proposed project would also include a total of 156 bicycle parking spaces, including 133 long-term residential bicycle parking spaces, 13 short-term residential bicycle parking spaces, and 10 commercial bicycle parking spaces.

B. Project Location

As shown in **Figure A-1, Project Location Map**, the project site is located at 1201 North Broadway on an approximately 0.73-acre site in at the northernmost edge of Los Angeles's Chinatown community and of the Central City North Community Plan Area of the City of Los Angeles. The project site is located at the northeast corner of the intersection of N. Broadway and Bishops Road. Chinatown's Central Business District lies southwest of the project site and the Gold Line Chinatown Station right-of-way is located to the southeast of the project site. The project site comprises four contiguous parcels fronting on North Broadway on the southeast and Bishops Road on the southwest. To the northwest, it is bordered by six lots housing single- and multi-family residences. Three of the lots are owned by the applicant. One of the lots houses an unoccupied single-family residence. The other two lots adjoining the project site to the north along Bishops Road are occupied by a portion of the existing office building which is proposed for demolition as part of the project. The project site is bordered to the northeast by a wholesale commercial business.

Primary regional access is provided by the Arroyo Seco Parkway (State Route [SR] 110), which runs north to south approximately 532 feet northwest of the project site. Major arterials providing regional and local access to the project vicinity include Hill Street approximately 0.20 mile to the west, College Street approximately 0.45 mile to the southwest, and N. Broadway, immediately south of the project site.

The project site is served by a variety of transit options including the Los Angeles Department of Transportation (LADOT) DASH Lincoln Heights/Chinatown line, with stops at N. Broadway and Bishops Road and multiple stops elsewhere along N. Broadway; this line also provides connectivity with the Los Angeles County and University of Southern California Medical Center. Metro Bus Routes 45-Harbor Freeway, 83 Downtown LA-Main-Venice, and 28 Century City via Downtown LA also service the project vicinity with a stop immediately adjacent to the project site at the corner of N. Broadway and Bishops Road. The Metro Gold Line Light Rail Chinatown Station is located 0.5 mile south of the project site and provides direct linkages to East Los Angeles and Pasadena/Azusa, as well as other lines within the Metro Rail system. Union Station, located approximately 0.75 mile south of the project site, is a major hub for public transportation, including heavy and light rails (Amtrak and Metrolink), and bus lines providing national, regional, and local access including to Los Angeles International Airport.

C. Project Site Conditions and Surrounding Uses

The project site proposed for redevelopment, which comprises three contiguous parcels (APNs, 5414-021-007, 5414-021-008, and 5414-021-021), is irregularly shaped and is currently occupied by a single-story building originally constructed in 1924 to house a Basso Chrysler/Jeep Dealership Cadillac automotive dealership and expanded to the north and east c.1937 and 1946 to house associated services. The building has been adaptively reused into an architecture firm's office; associated paved surface parking; and a gravel parking and outdoor work area. There is limited landscaping within and surrounding the project site, including two street trees (Australian willows) flanking the North Broadway driveway entrance to the project site, and six additional trees plus limited ornamental landscape planting (shrubs and groundcover) on the project site, facing North Broadway.

An approximately 10,000-sf parcel encompassing two lots adjoining the project site to the north along Bishops Road (APN 5414-021-001), also owned by the applicant, is occupied by a portion of the existing building (an addition constructed c. 1946 that shares a common party wall with the rest of the building) and is proposed for demolition as part of the project. No new development is proposed on this parcel, so it is not included in the developable lot area for purposes of calculating the allowable floor to area ratio (FAR). However, because demolition of the existing building is proposed, the parcel will represent an area of potential effect for purposes of the environmental impact analysis even if it is not considered part of the proposed development.

Figures A-2, *Aerial Photograph of Project Site*, and A-3, *Existing Site Plan*, depict existing conditions on the Project Site and in the vicinity.

The project site is located in an urbanized area with a mixture of low-rise commercial, retail, institutional, and residential uses, as described below:

- **North:** Immediately north, within the same block as the project site and along the south side of Savoy Street, are two 2-story multifamily residences (an apartment building and a converted single-family residence) and a two-story single-family residence that is owned by the applicant and is currently unoccupied. Further north, single- and multi-family residences

line the north side of Savoy Street. The lots north of the site sit at slightly higher elevations than the project site, as the topography rises toward the hills within Elysian Park north of Savoy Street. Properties in the Savoy Street neighborhood are zoned R3-1 with a Medium Residential Community Plan land use designation.

- **South:** Across N. Broadway to the east is the Los Angeles State Historic Park, established in 2005 on an approximately 32-acre parcel that formerly served as the Southern Pacific Railroad Company's River Station railroad yard. The park is planned as a major open space amenity within the Community Plan Area and its completion is anticipated in 2017. The Gold Line right-of-way (ROW) is located to the southeast of the project site, running parallel to N. Broadway. The ROW and a narrow linear parcel between the ROW and the park are zoned MR2-1 with a Light Manufacturing Community Plan land use designation.
- **East:** Abutting the project site to the east is a two-story building and associated one-story warehouse housing a commercial wholesale business and associated surface parking. This parcel has a zone designation of C2-2D with a Regional Commercial Community Plan land use designation.
- **West:** Existing developments across Bishops Road to the west include surface parking lots, the private Cathedral High School, and St. Peter's Italian Church. Properties to the west are zoned [Q] R3-1 and carry a Medium Residential Community Plan land use designation.

D. Land Use and Zoning

The project site is within the planning boundary of the Central City North Community Plan Area and has a land use designation of Regional Commercial (City of Los Angeles, 2016). The Regional Commercial land use designation is defined as centers intended to serve as the focal points of regional commerce, identity, and activity. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities and cultural facilities and supporting services. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities (City of Los Angeles, 1995). **Figure A-4, General Plan Land Use Designations**, depicts the designations for the project site and surrounding land uses.

As shown in **Figure A-5, Zoning**, the project site is zoned C2-2D, where "C2" denotes Commercial uses and "2D" denotes Height District 2. Uses permitted in the C2 Zone include, but are not limited to retail stores or repair shops, restaurants or cafes, amusement enterprises, residential uses (that must comply with requirements of the R4 Zone, Section 12.11, C.2 and 3), uses permitted in C1.5 Limited Commercial Zones, including retail and specialty stores, hotels, and residential uses. Height District 2 permits buildings up to a height of 75 feet (City of Los Angeles, 2016). The zoning and land use designation permits a maximum residential density of one dwelling unit per 200 sf of lot area. Thus, the zone allows for a maximum of 149 residential units. A total of 118 dwelling units is proposed, which is within the allowable maximum density permitted on the project site.



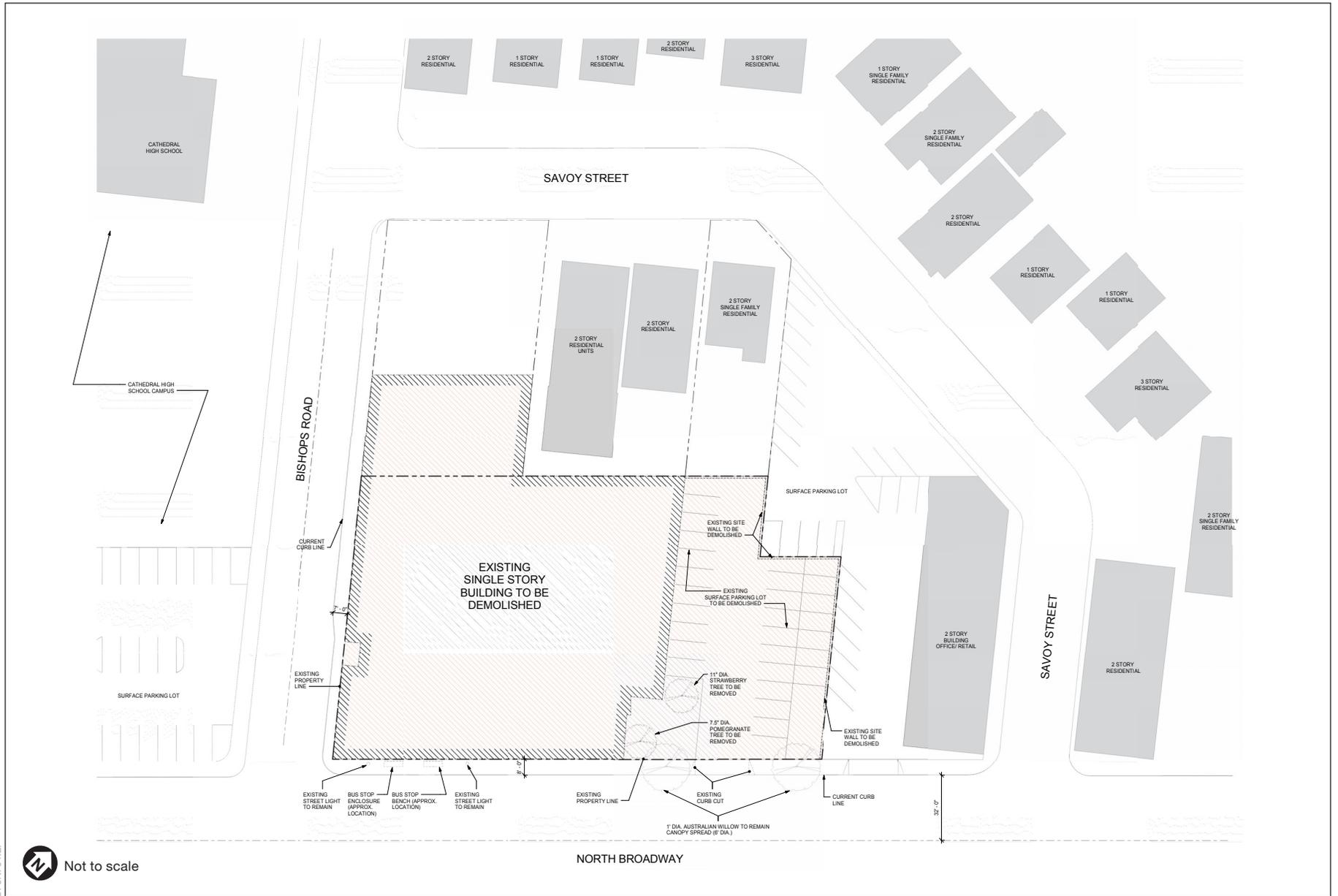
SOURCE: NAIP, 2014 (Aerial).

1201 N. Broadway

Figure A-2

Aerial Photograph of Project Site





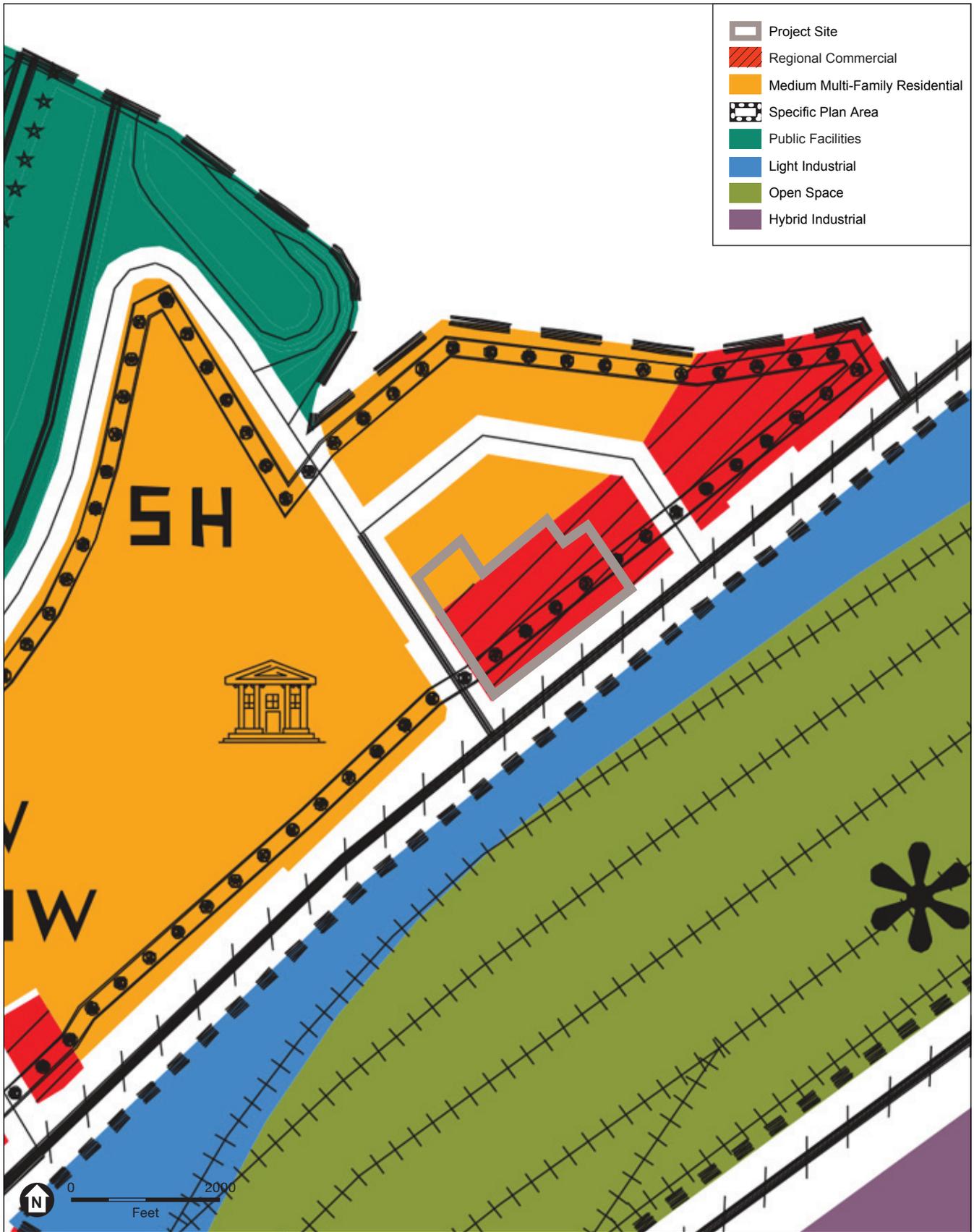
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SOURCE: Johnson Fain, 2017

1201 N. Broadway
Figure A-3
 Existing Site Plan



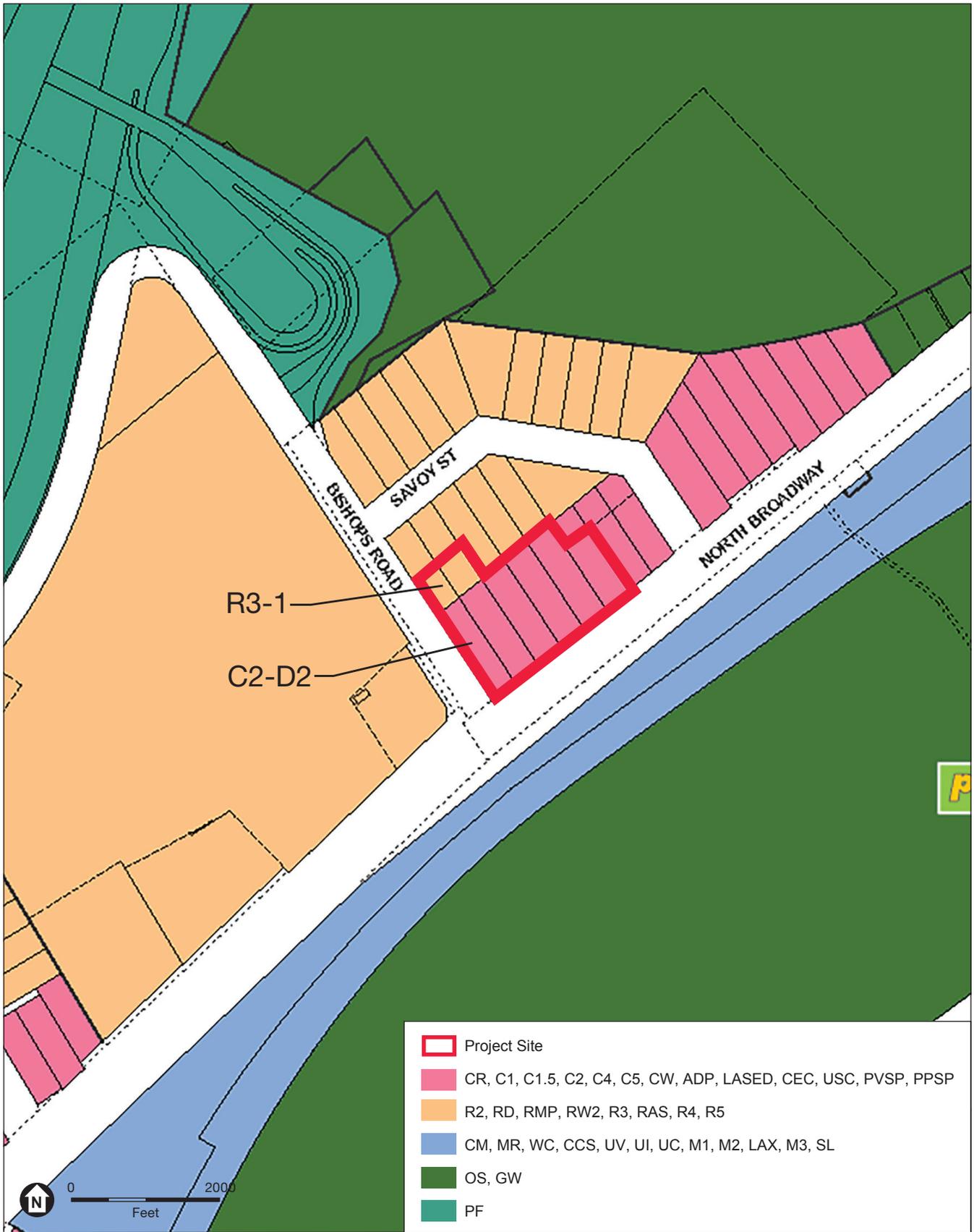


SOURCE: General Plan Land Use Map, Central City North Community Plan (as of February 25 2014); ESA, 2016

1201 N. Broadway

Figure A-4

General Plan Land Use Designations



SOURCE: Zimas, City of Los Angeles, Department of City Planning, 2017

1201 N. Broadway
Figure A-5
 Zoning

E. Project Characteristics

1. Project Overview and Design

The proposed project would demolish and replace the existing single-story office building on the project site with a new mixed-use, seven-story building containing 118 residential units and 8,795 sf of commercial/office uses. The new 89,434 sf building would be approximately 78 feet, 6 inches in height; the project FAR would be 2.99. The proposed project would not require a general plan amendment or a zone change amendment as it would be allowed within the existing Regional Commercial and C2-2D land use and zone designations.

The project would contain two subterranean parking levels, which would also contain storage areas for tenants; ground level containing a residential amenity lobby and space for one office/commercial tenant; common area/deck area and amenities lounge on Level 2; and 118 residential dwelling units (du) on Levels 2 through 7. The proposed floor plans are provided in **Figures A-6** through **A-13**. The proposed development program is discussed in detail below and summarized in **Table A-1, Development Program Summary**.

**TABLE A-1
DEVELOPMENT PROGRAM**

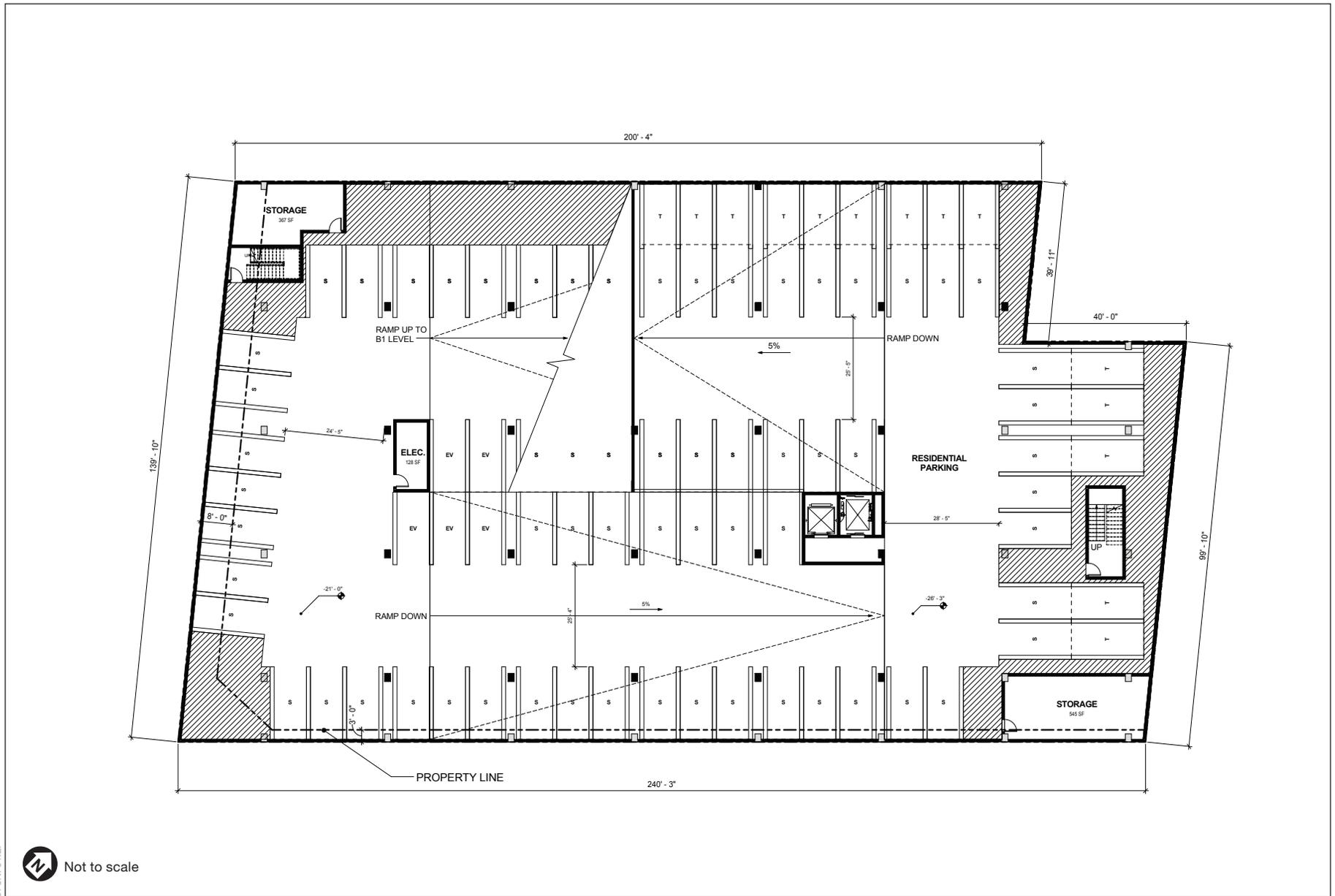
Use	Size/Area
Site Area (sf/ac)	31,829 sf/0.73 ac
Residential	
Studio Apartments	84 du
1BR Apartments	18 du
1BR + Den Apartments	16 du
Total Dwelling Units	118 du
Total Residential Floor Area	75,896 sf
Misc. Ground Floor Area	4,743 sf
Commercial	
Office/Commercial (Ground Floor)	8,795 sf
Total Commercial Floor Area	8,795 sf
Total Floor Area	89,434 sf
Floor to Area Ratio (FAR)	2.99:1
Vehicle Parking	
Residential	143 sp
Commercial	<u>18 sp</u>
Total Vehicle Parking	161 sp^a
LAMC-Required Vehicle Parking Spaces	
Residential	151 sp
Commercial	19 sp
Total Proposed Vehicle Parking Spaces	170 sp

Use	Size/Area
Bicycle Parking	
Residential	146 sp
Commercial	<u>10 sp</u>
Total Bicycle Spaces	156 sp
LAMC Code-Required Bicycle Spaces	140 sp
Open Space & Amenities for Residents	
Common Exterior Landscape Roof Deck (Level 2)	8,509 sf
Common Interior Amenity Space (Level 2)	822 sf
Common Exterior Open Space (Level 7)	3,076 sf
Private Open Space for Residents (Balconies)	5,050 sf
Total Common Open Space & Amenities For Residents	17,457 sf
LAMC -Required Common Space & Amenities	12,200 sf

SOURCE: Johnson Fain, 2017.

The building design is intended to be streamlined and contemporary, while avoiding large undifferentiated planes or blank walls along any of the elevations, or out of scale massing. The building would incorporate a variety of building materials, architectural features, window types and treatments, residential terraces and balconies, and other articulated elements so as to provide visual variety along North Broadway, Bishops Road, and Savoy Street. The ground floor commercial space would be stylistically differentiated from the residential portion of the building and would be oriented toward North Broadway as well as Bishops Road to enliven both. The partial level of at-grade podium parking would be located behind the commercial/office space, supporting the Level 2 roof deck, and would not front on North Broadway. The mid-rise building would be set back more than 50 feet from the northern property line, with the landscaped deck atop the parking podium providing a buffer between the proposed building and lower-density residential properties to the north.

The proposed project would be designed in a contemporary architectural style, as illustrated in Figure A-11. The proposed project includes two levels of subterranean parking plus a partial level of at-grade parking within a podium structure, topped by a six-story mid-rise residential building, for a total of seven stories.



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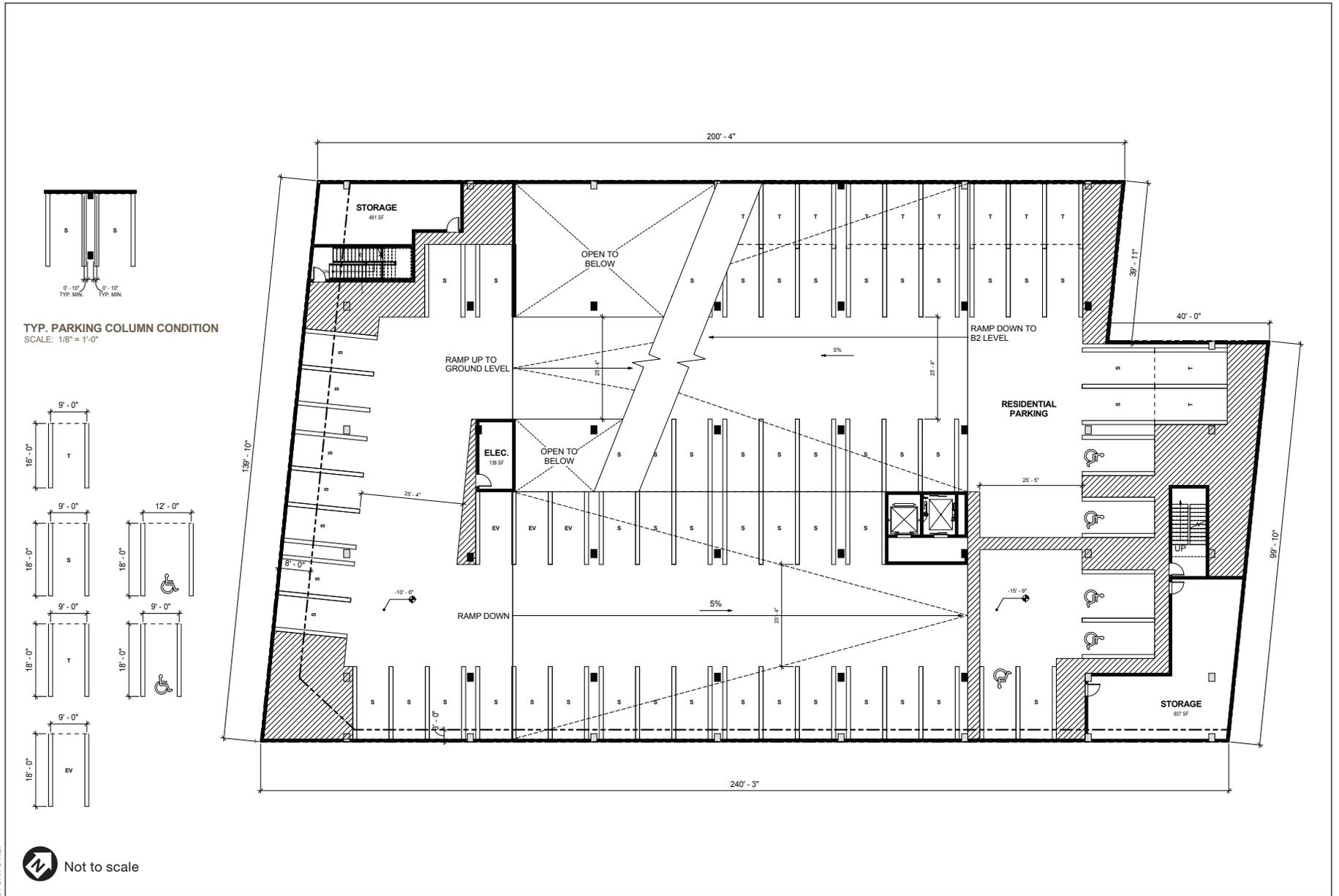
SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-7

Conceptual Site Plan - Level B2





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 Not to scale

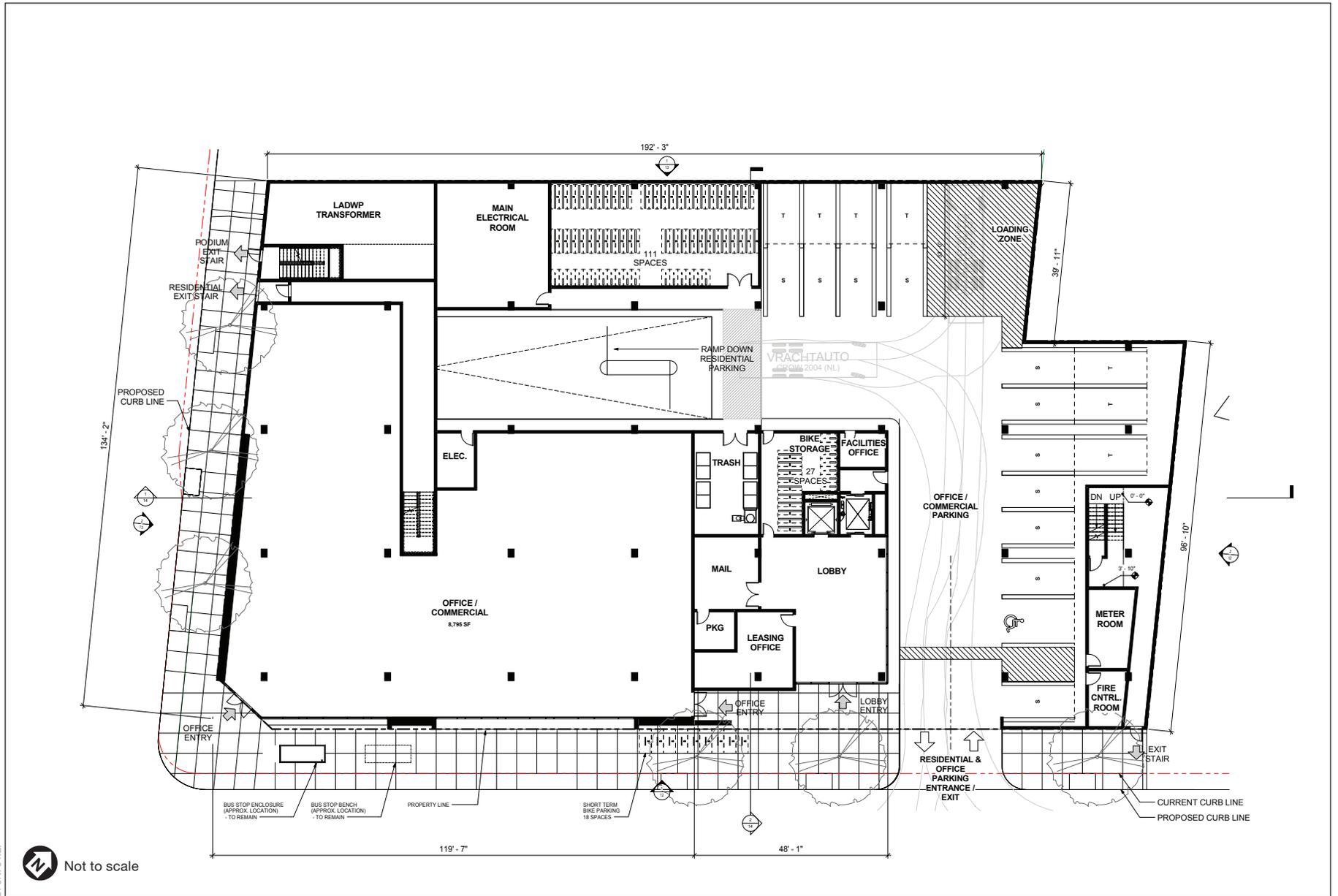
SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-8

Conceptual Site Plan - Level B1





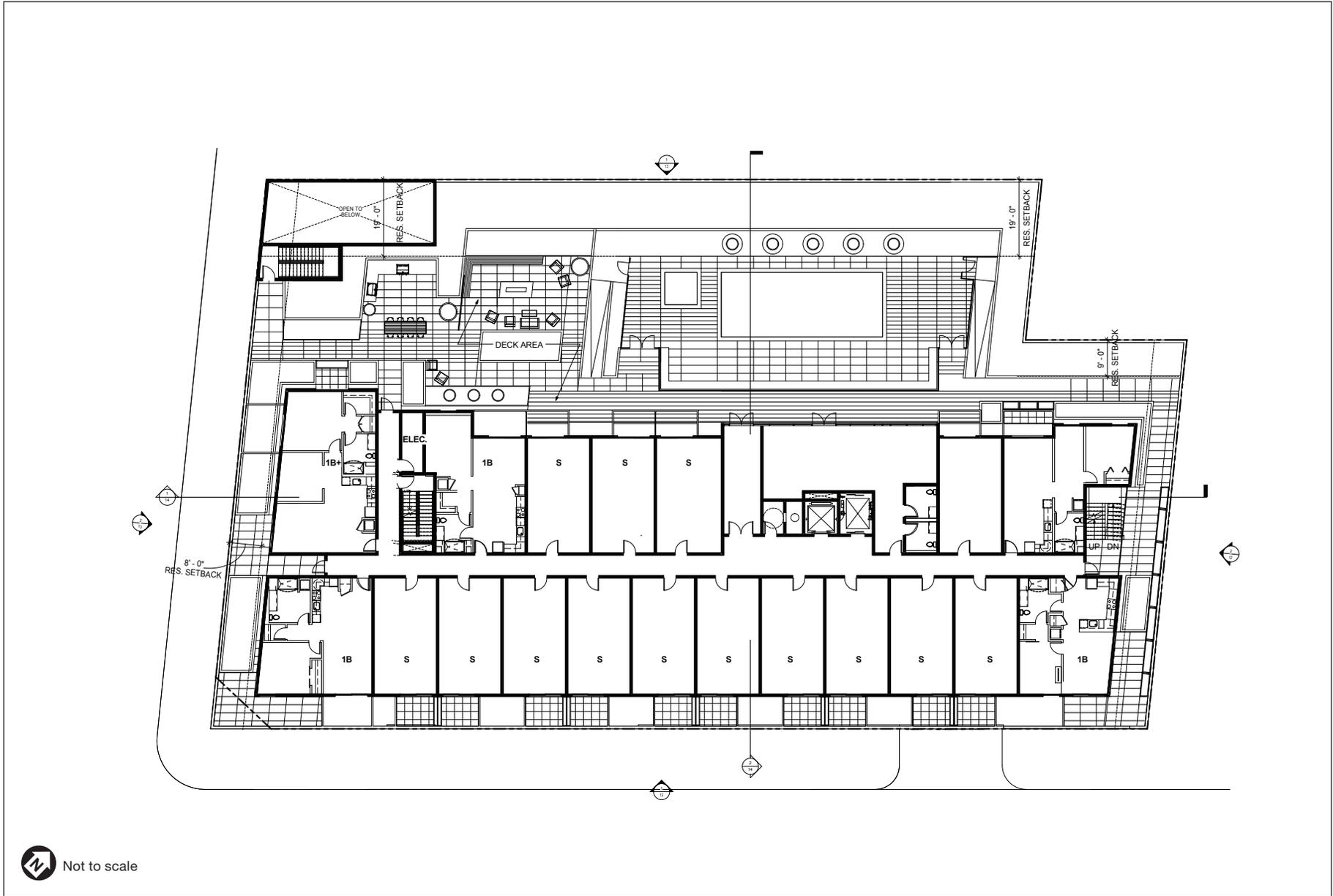
SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-9

Conceptual Site Plan - Ground Level





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Not to scale

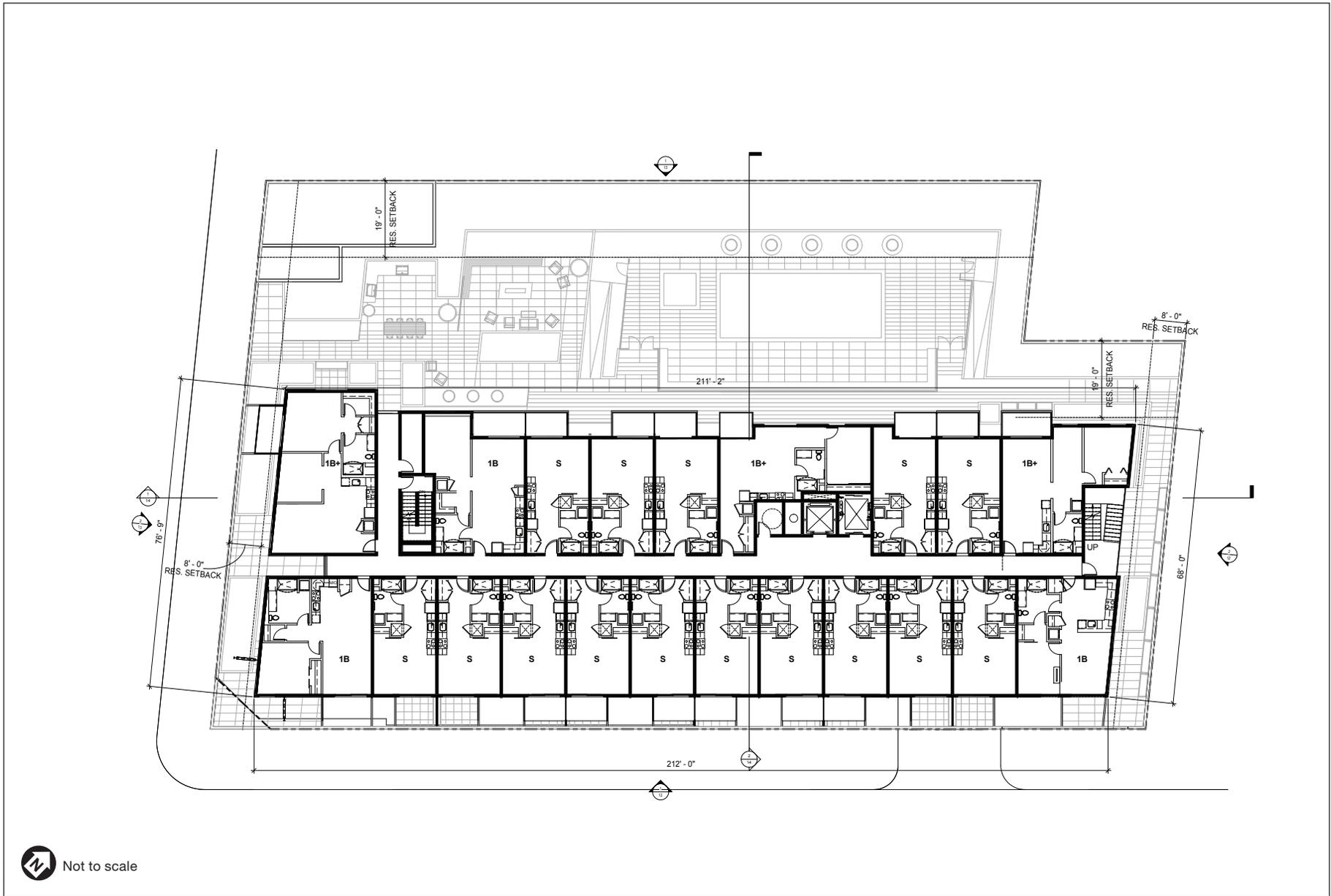
SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-10

Conceptual Site Plan - Level 2





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Not to scale

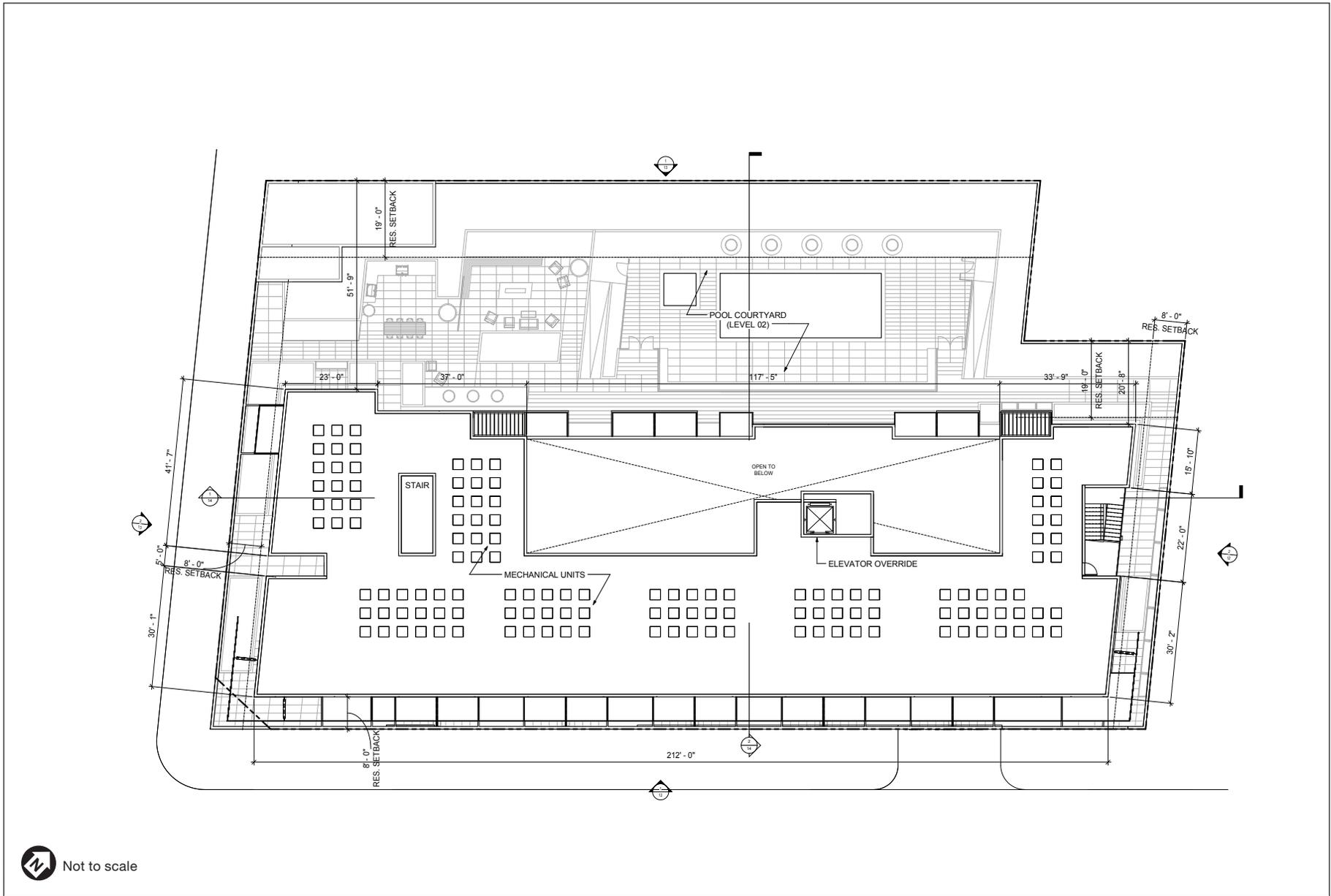
SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-11

Conceptual Site Plan - Typical Floor





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 Not to scale

SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-12

Conceptual Site Plan - Roof Plan





DPJNF01.EP

SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-13

Conceptual Rendering of Proposed Project



2. Landscaping and Open Space

According to the Los Angeles Municipal Code (LAMC) Section 12.21-G (2), new construction of a building or group of buildings containing six or more dwelling units on a lot shall provide at minimum the following usable open space per dwelling unit: 100 sf for each unit having less than three habitable rooms; 125 sf for each unit having three habitable rooms, and 175 sf for each unit having more than three habitable rooms. Therefore, the proposed project is required to provide 12,200 sf of open space.¹

Approximately 17,457 of usable common and private open space areas would be provided as part of the proposed project. As shown in **Figure A-14, *Open Space Calculation***, the proposed project includes 12,407 sf of common open space (Level 2 and Level 7) and 5,050 sf of private open space.² Level 2, atop the podium base, would include a common deck area with amenities including, a pool and pool deck, seating garden, outdoor kitchen, dining terrace, fire pit, cabanas, and spa. In addition to common open space, all units would be provided with private balconies totaling 5,050 sf. A comprehensive landscape plan using primarily drought-tolerant plant species such as palo verde, manzanita, purple sage, and flax would be implemented as part of the proposed project. **Figure A-15, *Conceptual Landscape Plan – Outdoor***, and **Figure A-16, *Conceptual Landscape Plan – Indoor***, depict the proposed landscape plans.

3. Access and Parking

Pedestrian access to the proposed project would be available from North Broadway, Bishops Road, and internally from within the on-site structured parking. Public pedestrian access to the office/commercial use would be from the corner of North Broadway and Bishops Road. Access to both the residential tower and the podium deck would be available along Bishops Road. An alternate (secondary) office entrance and the residential lobby entrance would be available along North Broadway.

As shown in Figure A-4, vehicular access to the project site would be provided by one full-access (ingress and egress) driveway along North Broadway, which would accommodate residential and office parking and loading. The proposed project would provide 170 vehicle parking spaces on-site, with two levels of subterranean parking and a half-level of at-grade podium parking, including 151 residential parking spaces (two levels of subterranean parking) and 19 commercial parking spaces (ground level), as shown on Figures A-7, A-8, and A-9. Eight of the parking spaces would be fully equipped with electric vehicle (EV) charging stations and additional spaces will be provided with infrastructure to support future electrical vehicle supply equipment, or charging stations. The parking provided would be in compliance with the LAMC, which requires the project to provide a total of 161 parking spaces (143 residential and 18 commercial parking spaces required).

¹ (100 sf x 102 units less than 3 habitable rooms) + (125 sf x 16 units with 3 habitable rooms) = 12,200 sf required open space.

² (950 sf Level 2 private balcony area) + (820 sf private balcony area [per level] x 5 levels) = 5,050 sf of total private open space.

OPEN SPACE AREA

OUTDOOR COMMON OPEN SPACE	11,585 SF
OUTDOOR PRIVATE OPEN SPACE	5,050 SF
TOTAL OUTDOOR	16,635 SF

INDOOR COMMON OPEN SPACE	822 SF
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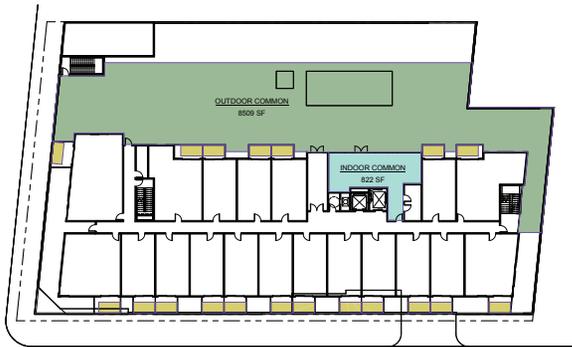
TOTAL OPEN SPACE	17,457 SF
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Area Schedule (OPEN SPACE)

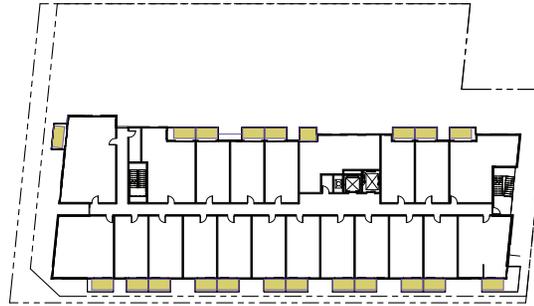
Name	Area
LEVEL 02	
INDOOR COMMON	822 SF
OUTDOOR COMMON	8509 SF
OUTDOOR PRIVATE	850 SF
LEVEL 03	
OUTDOOR PRIVATE	750 SF
LEVEL 04	
OUTDOOR PRIVATE	1000 SF
LEVEL 05	
OUTDOOR PRIVATE	1050 SF
LEVEL 06	
OUTDOOR PRIVATE	850 SF
LEVEL 07	
OUTDOOR COMMON	3076 SF
OUTDOOR PRIVATE	450 SF
	17457 SF

OPEN SPACE LEGEND

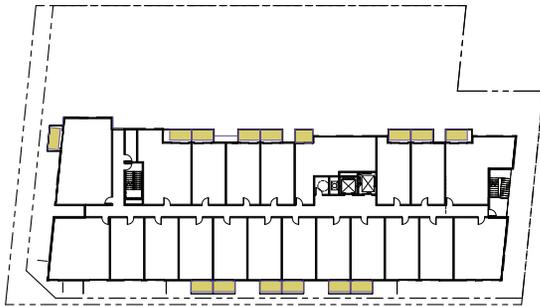
- INDOOR COMMON
- OUTDOOR COMMON
- OUTDOOR PRIVATE



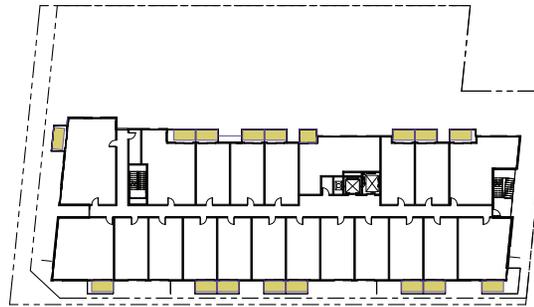
LEVEL 02



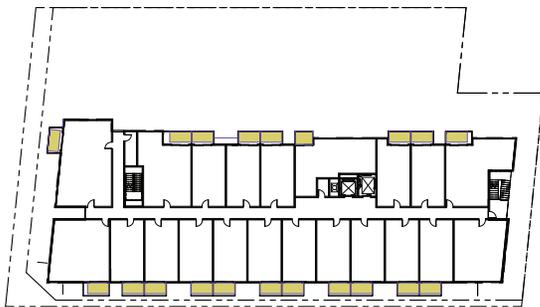
LEVEL 05



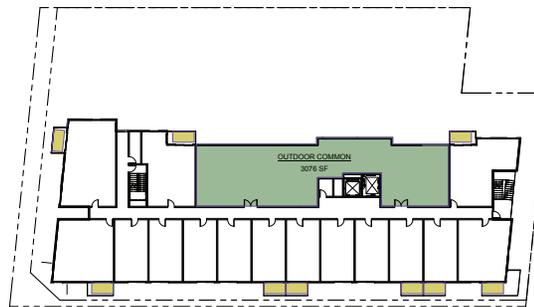
LEVEL 03



LEVEL 06



LEVEL 04



LEVEL 07



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SOURCE: Johnson Fain, 2017

1201 N. Broadway

Figure A-14

Open Space Calculation





DPJNF01.EP

SOURCE: Johnson Fain, 2017



1201 N. Broadway
Figure A-15
 Conceptual Landscape Plan – Outdoor



SOURCE: Johnson Fain, 2017

1201 N. Broadway
Figure A-16
 Conceptual Landscape Plan – Indoor

In addition to vehicle parking, the proposed project would provide a total of 156 bicycle parking spaces in compliance with LAMC Ordinance No. 182386, including 133 long-term (storage) spaces and 13 short-term spaces for residential uses, five long term spaces and five short-term spaces for commercial/office uses. All long-term bicycle storage is proposed within two storage rooms in Level 1 (the at-grade podium level) of the parking structure and all short-term spaces would be located at the pedestrian entrance to the residential lobby/secondary entrance to the commercial/office space on North Broadway. The proposed bicycle parking supply exceeds the LAMC requirement for short- and long-term residential bicycle parking by 16 spaces and meets the requirements for all other bicycle parking (133 long-term residential bicycle spaces, 13 short-term residential spaces, and 10 commercial/office spaces required).

4. Transit Access

The project site is located 0.5 mile northeast of the Chinatown Metro Station (light rail) for the Metro Gold Line, located at 1231 North Spring Street. This line provides access to the other transit lines operated by Metro, including Union Station (one stop from the Chinatown Metro Station), which provides access to the Metro Red and Purple Lines, a variety of Metro Local Bus lines, and regional transportation links such as Metrolink and Amtrak. Further, a bus stop operated by Metro and the Los Angeles Department of Transportation (LADOT) is located in front of the project site on the north side of North Broadway, near the intersection of North Broadway and Bishops Road. Metro provides the following local bus service lines:

- Bus line 28: Generally runs east-west from Eagle Rock to Century City.
- Bus line 45: Generally runs north-south from Lincoln Heights to Rosewood.
- Bus line 83: Generally runs north-south from Eagle Rock to Downtown Los Angeles.

5. Lighting and Signage

New project site signage would include building identification, commercial retail, wayfinding, and security markings. Commercial signage would utilize glare-free fixtures to complement architectural features and reduce the potential for light spillover, and no off-site signage is proposed.

Pedestrian areas would be well-lighted for security. Project lighting would also include visible interior light within the ground-level commercial and residential uses, streetlights on North Broadway and Bishops Road, wall-washers and other similar architectural surface lighting along the building elevations. Lighting would be shielded downward and/or away from adjacent uses, including lighting for outdoor terraces, and the use of pole-mounted lighting or floodlights is not anticipated. The proposed project's lighting scheme would be compatible with the surrounding development, as exterior lighting would illuminate on-site facilities in order to provide sufficient lighting for circulation and security, while minimizing impacts on adjacent properties.

6. Security Features

The proposed project would incorporate a 24-hour/seven-days-per-week security program to ensure the safety of its residents and site visitors. The proposed project would be designed in consideration of the City's "Design Out Crime" initiative to provide project designs that incorporate strategies from Crime Prevention through Environmental Design (CPTED). Design strategies implemented as part of the project design would include, but are not limited to, the following:

- Secure access points would be limited and located in areas of high visibilities;
- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public, and private spaces;
- Access key cards and cameras would be used; and
- Interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime.

Additionally, the following security measures would be implemented by the proposed project:

- Installing and utilizing a 24-hour security camera network throughout the underground and above-grade parking structure; the elevators; the common and amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces.
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed.
- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user.
- Training employees on sound security policies for the project's building. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and monitoring the property.
- Access to the commercial/office uses would be unrestricted during business hours, with public access disconnected after businesses have closed.

F. Construction Activities and Schedule

Construction of the proposed project is expected to last approximately two years and is tentatively scheduled to begin in early 2019, pending project approval, and continue through mid-2021. Construction activities would commence with demolition of the existing building and paved surfaces, followed by site preparation, excavation and grading, installation of drainage and utilities, foundations and concrete pour, and building construction and application of architectural coatings. Demolition activities would result in the removal of approximately 22,440 sf of hardscape (i.e., concrete and asphalt), with a maximum of 20 truckloads per day. It is anticipated

that demolition and site preparation would occur over a three-month period. Approximately 36,000 cubic yards of soil would be removed from the project site during the excavation and grading phase. The construction haul route from the project site would entail trucks exiting the project site onto North Broadway and heading northeast on N. Broadway to Pasadena Avenue to access the Golden State Freeway (Interstate 5). Given that the maximum number of pieces of construction equipment used daily on the project site would be required during the demolition phase, in an effort to minimize exposure of adjacent uses to the project site to daily emissions, the applicant would implement a project design feature (PDF) that requires all off-road construction equipment exceeding 50 horsepower (hp) used during the demolition phase to meet, at a minimum, the U.S. Environmental Protection Agency (USEPA) Tier IV interim engine certification requirements, or to apply other available technologies to the construction equipment that would achieve the same pollutant emissions reduction as USEPA Tier IV construction equipment. This PDF is included and described in Attachment B, *Explanation of Checklist Determinations*, of this Initial Study. The remaining construction phases would occur over an approximately 18-month period.

Construction is expected to occur between the hours of 7:00 A.M. and 6:00 P.M. on Monday through Friday, and during the hours of 8:00 A.M. and 5:00 P.M. on Saturday. These hours are reduced relative to what is allowed by the LAMC Noise Ordinance (LAMC Section 41.40), which allows construction between the hours of 7:00 A.M. and 9:00 P.M. on non-holiday weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays. No construction would occur on Sundays or federal holidays.

The number of construction workers and construction equipment would vary throughout the construction process in order to maintain an effective schedule of completion. It is estimated that during the construction period the number of workers that would be on-site would range from approximately 10 to 80, with a peak of approximately 150 workers.

G. Necessary Approvals

As required by Section 15063 (a) of the CEQA Guidelines, a lead agency shall prepare and Initial Study to determine if a proposed project may have a significant effect on the environment. The City of Los Angeles, as the lead agency for environmental review, has principal responsibility for approving the proposed project. Approvals required for the development of the proposed project are anticipated to include, but are not necessarily limited to, the following:

- Pursuant to LAMC 16.05, Site Plan Review for a project that will result in an increase of more than 50 dwelling units;
- Pursuant to LAMC Section 17.01, approval of Vesting Tentative Tract Map No. 74785 for the merger and subdivision of the subject parcels necessary to facilitate the development of a mixed-use project; and
- Haul Route Approval;
- Adoption of the IS/MND; and
- Grading, excavation, foundation, and associated building permits.

ATTACHMENT B

Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. Where applicable, project design features (PDFs) and/or mitigation measures are identified in the analysis to help reduce or avoid significant impacts on the environment.

1. Aesthetics

Senate Bill (SB) 743, enacted in 2013, changes the way in which environmental impacts related to transportation and aesthetics are addressed in an EIR. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant unavoidable 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.*

Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2451 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within transit priority area (TPA) pursuant to CEQA. A TPA is an area located within one-half mile of a major transit station. Because of the mixed-use residential character of the project and its location within an urban transit priority area, the Project's aesthetic impacts shall not be considered significant. Nonetheless, the Project is herein compared to the respective CEQA thresholds for disclosure/informational purposes only.

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The existing visual setting of the project area is characterized by a mix of urban uses and open space. The segment of North Broadway that comprises the immediate visual setting (from roughly the Los Angeles River Bridge north of the project site and south to Cottage Home Street) is generally comprised of lower density development with surrounding open space recreation areas, including Radio Hill Gardens to the north and Elysian Park to the west (both of which are topographically higher than the project site), and Los Angeles State Historic Park to the south/southeast (situated topographically lower than the project site). Scenic vistas of the larger Los Angeles area are available to recreational viewers in these parks as

they each provide broad views of the densely developed Chinatown and greater downtown Los Angeles area.

The area immediately surrounding the project site to the north, west, and east encompasses buildings of various heights (but generally not more than 2 to 3 stories), architectural styles, use, and construction dates. The immediate development surrounding the project site is generally lower density than the larger area (i.e., Chinatown). The primary visual focal point to the south/southeast is Los Angeles State Historic Park, which is a 32-acre undeveloped park area immediately across North Broadway that has been in various forms of construction for the past several years (construction completion slated for 2017) (California State Parks, 2017). Beyond Los Angeles State Historic Park to the south are distant views of urban Los Angeles development in an area known as Mission Junction. Direct views of the project site and the hillsides of Elysian Park are visible from Los Angeles State Historic Park. Current views of the project site from this location are of the single-story, black Johnson Fain building, with minimal landscaping. Views from residences on Savoy Street behind (north of) the project site provide elevated distant views to the south of the greater Los Angeles area.

The proposed project would develop a seven-story building (approximately 78 feet tall), compared to the one-story building currently on the project site, which would alter existing scenic vistas that are available from Radio Hill Garden, Elysian Park, and Los Angeles State Historic Park. The proposed project would be the tallest building in the immediate area and would be a primary visible structure. However, the scenic vistas provided from the three public parks in the project vicinity are predominantly of the urban developed landscape of the greater Los Angeles area. The scenic vista, while it would change to include a seven story building of new construction, would not significantly alter the existing vistas, nor would it alter the primary viewshed components of the existing vistas of the urban Los Angeles area. Impacts related to scenic vistas would therefore be less than significant.

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?

Less Than Significant Impact. State Route (SR) 110, the Arroyo Seco Historic Parkway, is located approximately 532 feet north of the project site. The segment of SR 110 in proximity to the project site is characterized as a “historic parkway” per the California Scenic Highway Mapping System (Caltrans, 2016). The project site is located closest to the segment of SR 110 that includes the first of the three tunnels (heading north) and the elevated section of SR 110 (heading south). Views of the project site from this part of the Arroyo Seco Parkway are indirect and almost entirely screened by existing mature vegetation and topography along the highway right-of-way. Direct views of the project site are not possible, though distant fleeting views of the downtown Los Angeles skyline to the east, beyond the project site, are visible. Given the distance of the project site from the roadway, as well as intervening topography and vegetation that block the site visibility from the Arroyo Seco Parkway, the proposed seven-story building would not be visible and would have a less than significant impact on this resource.

The proposed project would not damage scenic resources such as trees, rock outcroppings, or other locally recognized desirable aesthetic features. The project would involve demolition of the existing one-story building, which is visible from a number of off-site locations in the project area, and would replace it a new, contemporary seven-story building. Apart from the Arroyo Seco Parkway, other eligible and/or designated historic resource(s) that would have views of the project site are the Los Angeles Historic State Park, a City-designated cultural historic landmark just across North Broadway and the light rail ROW from the project; Cathedral High School, which is a designated HCM and is located on the west-side of Bishops Road directly across the street from the project site; 437 Savoy Place, a multi-family residence located to the north across Savoy Street from the project area; and the National Register-eligible, State Register-listed Capitol Milling Company property located 0.25 mile to the south at 1231 North Spring Street.

These historic resources are not designated as such for their views of the project. Although the project building would be visible from the Los Angeles State Historic Park, it would not substantially alter its setting or otherwise adversely impact the integrity or eligibility of the resource. Due to its proximity to the project site, Cathedral High School would have a direct view of the seven-story project. However, because the campus is on an upward sloping lot, views toward the project would be indirect and include the upper stories of the project while maintaining the view southward of the Los Angeles State Historic Park. The greatest view of the project would be from a parking lot located along Bishop Road which has high shrubbery that shields views to North Broadway. Therefore, the introduction of a greater height and density to the neighborhood would not lock historic view sheds of Cathedral High School. The multi-family residence at 437 Savoy Street would have an indirect view of the project site. 437 Savoy Street is located on a residential street improved with single and multi-family residences during the 1890s and early 1900s. These residences are located at a higher plain than the project site and the commercial building improved along North Broadway. The construction of the project would not compromise 437 Savoy Street's views within Savoy Street and southward views of the Los Angeles State Historic Park. The project is sufficiently distant from the Capitol Milling Company property to preclude impacts on its setting or integrity. Project impacts on these historic resources would be less than significant.

Therefore, the project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway, and impacts would be less than significant.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impacts

Less Than Significant Impact. Construction activities typically result in site disturbance, movement of construction equipment, import and export of materials, temporary views of incomplete buildings, and other activities that generally contrast with the aesthetic character of an area. Construction activities would be primarily visible from the North Broadway right-of-way with construction also visible from commercial and residential properties immediately north, east, and west of the project site, and from the Los Angeles State Historic Park. Construction would

entail demolition of the existing commercial and industrial buildings, and surface parking, grading, staging of construction vehicles, storage of materials, and building construction. Demolition, grading and construction of new buildings, sidewalk improvements, and installation of landscaping would be temporarily disruptive. Construction of the proposed project is expected to last approximately two years and is tentatively scheduled to begin in early 2019 and continue through mid-2021.

Because of the short-term, temporary nature of the construction activities, construction activities would not substantially alter, degrade, or generate long-term contrast with the visual character of the surrounding area. In addition, construction fencing would be provided for safety, and would also serve to screen views of grading and other site disturbance from adjacent streets and sidewalks. The construction fencing for the project is proposed along the perimeter of the project site with a minimum height of 8 feet as set forth in PDF AES-1. As construction fencing has the potential to attract graffiti or posting of unauthorized materials, PDF AES-1 also includes daily visual inspection of the fence, temporary barriers, and walkways and the removal of any observed graffiti or unauthorized materials. In addition, the project would comply with Los Angeles Municipal Code (LAMC) Section 91.6205 to maintain the visibility of required signage and construction barriers. The construction barriers will have plainly visible signs to show that no bills or unauthorized signs will be allowed on the construction barriers. Therefore, temporary impacts with respect to visual character during construction would be less than significant.

Operational Impacts

Less Than Significant Impact. The project site is currently developed with surface parking and a single-story commercial building occupied by architecture offices. Existing landscaping on the project site is very limited and includes two on-site trees, shrub plantings along North Broadway, and two street trees on either side of the existing driveway. The existing building is visually prominent from North Broadway. The existing building on-site and elsewhere on this segment of North Broadway are generally one to two stories in height and, overall, smaller in scale than development to the south along North Broadway as it passes through the highly urbanized Chinatown and into downtown Los Angeles. While existing development on the project site is visually distinctive, it does not convey a high level of visual quality given the larger broad visual context. There are no scenic natural or urban features on the project site and no historic buildings.

Upon completion, the proposed project would include a mix of residential and office/commercial uses within a seven-story building (up to approximately 78 feet in height). The contemporary modern building would have a distinctive architectural style that would add visual interest to North Broadway. As shown in Figure A-13 in Attachment A, Project Description, the more active and commercially-oriented street of North Broadway would include street level commercial uses and pedestrian amenities. The ground -floor commercial/office space would include large windows and doors to help activate the streetfront and provide visual transparency to the proposed project. Street level uses along North Broadway would include the building's residential lobby and ground level amenity spaces, including the leasing office. The proposed building would include balconies and recesses that would articulate each façade. The building corners are designed with a 'floating box' effect and window placement that is also intended to break up the building's mass.

Substantial new landscaping would be provided as part of the proposed project. While the two existing on-site trees would be removed (the two existing street trees would remain), 39 new trees would be provided on the project site, including four additional street trees (three along Bishops Street and one along North Broadway). Private balconies along North Broadway that overlook Los Angeles State Historic Park would be separated with planters to create garden terraces along the urban boulevard. Larger planters located at the edges and corners of the podium level units would soften solid architectural facades. Along the rear (north) face of the parking podium, the proposed design includes a strong vertical landscape buffer to screen the building from view from adjacent properties and increase privacy for project residents.

As the project site does not currently possess a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the proposed project would not degrade the visual character and quality of the site and its surroundings. Furthermore, the proposed project would enliven the pedestrian experience through a new streetscape design that would substantially increase landscape amenities, including the provision of street trees and other landscaping. Thus, impacts on visual quality would be less than significant.

While the proposed building would be taller and greater in mass than the existing building on the project site, the height of the project would be not be out of scale with other buildings in the area, including, but not limited to, the nearby Blossom Plaza residential complex and the 24-story Los Angeles County Metropolitan Transportation Authority (LA Metro) building. The project will also be required to comply with LAMC Section 91.8104 to maintain every building, structure, and fence in a safe and sanitary condition. The buildings will be free from debris, rubbish, garbage, trash, overgrown vegetation, and graffiti. Visual character impacts in terms of scale and compatibility with the neighborhood would therefore be less than significant.

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

Light and Glare

Less Than Significant Impact. The project site is currently occupied by a single-story office building and associated surface parking lot. The proposed project is located in a highly urbanized area with a mixed of commercial and residential land uses, and is characterized by modest structures, of no more than two stories in height. Three streetlights and several pole and wall lights provide illumination near the existing buildings and associated surface parking lot.

The mix of land uses in the immediate project site vicinity primarily consists of low-rise buildings associated with various commercial and residential uses. The area is characterized by high ambient light levels from streetlights, architectural and security lighting, indoor building illumination, and vehicle lights along adjacent roadways.

As with similar uses in the area, the proposed project's mix of uses would generate low to moderate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting. Soft accent lighting used for signage, and architectural highlighting

would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spill off the project site.

Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the project site and not on adjacent residential properties as set forth in PDF AES-2. The pole light in the surface parking lot would be removed. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Pursuant to Section 93.0117(b) limits the maximum amount of illuminance from an exterior light source at the property line of the nearest residentially-zoned property. LAMC Section 14.4.4.E, requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Building materials would include plaster, glass, metal, and cast-in-place concrete. In accordance with City requirements, the exterior of the proposed structure would be constructed of materials such as, high-performance and/or low-reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat (see PDF AES-3). To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts are not expected to be substantial or to adversely affect day or night views. Therefore, glare impacts are considered less than significant.

Project Design Features

PDF AES-1: The applicant shall provide and maintain a construction fence for safety and to screen views to the project site during construction to the extent feasible. The fence shall be located along the perimeters of the project site with a minimum height of 8 feet. The applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

PDF AES-2: Outdoor lighting shall be designed, shielded and directed toward the areas of the project site to be lit to limit spill-over onto adjacent residential uses.

PDF AES-3: The exterior of the proposed building shall be constructed of materials such as, but not limited to, high-performance low reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would avoid substantial glare and reflected heat.

Shade/Shadow

Less Than Significant Impact. 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 uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

For purposes of this analysis, a project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. between late October and early April, or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. between early April and late October.¹

Shading diagrams are presented for winter and summer solstices as well as the spring and fall equinoxes in Appendix A. Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadow effects identified at these four points in time. Shadow lengths, based on the project's building height, are identified for specific times of the day and vary according to the season of the year.

Shade-sensitive receptors in the project vicinity include uses to the west (Cathedral High School), north (residences along Savoy Street), and east/southeast (Los Angeles State Historic Park). Winter solstice is the only season during which noticeable shadows would be cast off-site. Shadows at 9:00 A.M. would be cast north of the project site onto the multi-family residences on abutting properties fronting on Savoy Street. However, these shadows would clear those properties before 10:00 A.M. and would therefore affect these residences for less than two hours. Shadows generated by the project would not shade any part of the Cathedral High School to the west or Los Angeles State Historic Park to the east/southeast.

Therefore, the proposed project building would not significantly increase the shading of nearby shadow-sensitive uses based on the significance thresholds stated above, and impacts related to off-site shading of shade-sensitive land uses would be less than significant \.

Cumulative Impacts

Aesthetics

Development of the project, in conjunction with related projects in the area surrounding the project site, would result in an incremental intensification of land uses in a heavily-urbanized area of the City of Los Angeles. Because of the area's generally flat terrain to the south and east, public scenic views are generally available only along public street corridors and from public parks that have street corridor views or are set back from existing buildings.

The related projects are proposed or located in urban settings throughout the project area, and the project, considered together with the related projects, would not affect existing public views of historic resources in the project area. In addition, most development of a larger scale would be subject to independent environmental review. Although some views of architecturally or historically important buildings can be obscured by taller buildings constructed within the line of

¹ Shadow impacts thresholds based on criteria set forth in the City of LA CEQA Thresholds Guide (2006).

sight to such resources from off-site vantage points, the proposed project would not block any primary views in the immediate area and, as stated in more detail below under Section 5, Cultural Resources, together with related projects would not obstruct any views historic resources in the immediate vicinity. Accordingly, as the project would not have direct or significant indirect impacts on scenic resources, its contribution to impacts on views of scenic resources from other related projects would not be cumulatively considerable, and cumulative impacts would be less than significant.

Because the visual character of the area is defined by a range of diverse architecture that is generally not cohesive, the proposed development would result in an upgrade of the visual quality of the area. New development subject to discretionary approval would conform to the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would not degrade the visual character of the area. Accordingly, as the related projects and the project would not degrade the visual character of the project area, the project's contribution to impacts on visual character would not be cumulatively considerable, and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by considerable ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the project and related projects would not significantly impact sensitive uses. As the project would not have a significant lighting impact, and impacts from related projects would also be less than significant due to high ambient lighting levels and conformance with relevant lighting standards in the LAMC, its contribution to impacts due to lighting from other related projects would not be cumulatively considerable, and cumulative impacts would be less than significant.

Building plans for new related projects would be reviewed on a case-by-case basis by the City Department of Building and Safety to ensure that new construction would avoid the use of glare-prone materials. As the project would not have a significant glare impact, and impacts from related projects would also be less than significant due to City plan review of building materials, its contribution to glare impacts from other related projects would not be cumulatively considerable and cumulative impacts would be less than significant.

Downtown Los Angeles and Central City North Community Plan Area are heavily developed areas with an array of building volumes where varied shading conditions occur throughout the day. With regard to shading at a particular shade sensitive resource, shading is a localized phenomenon and cumulative shading impacts would only occur when development projects are in the immediate vicinity of one another. Due to the locations of the related projects, which are a considerable distance from the project site, there would not be overlapping shadow effects on sensitive receptors in association with the project. Thus, the project would not contribute to cumulative shadow effects, and cumulative impacts would be less than significant.

Overall, cumulative aesthetics impacts would be less than significant.

2. Agricultural and Forest Resources

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

Would the project:

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

No Impact. The project site is located within a highly urbanized area and is currently developed with existing commercial and industrial buildings and related surface parking. No agricultural uses, or related farmland operations are present within the project site or surrounding area. The project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) (CDC, 2016a). The urban character of the project site would be consistent with the FMMP's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur and no mitigation measures are required.

- b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?**

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The project site is not located within a Williamson Act Contract, according to the California Department of Conservation (CDC, 2016b). Further, the project site is not zoned for agricultural uses presently and will not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract. Therefore, the proposed project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur.

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

No Impact. The project site is currently developed with an existing office building and paved parking and is not zoned for forestry or timberland uses. The existing zoning for the project site is C2-2D (Regional Commercial), which permits commercial, industrial, and residential uses. Thus, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur and no mitigation measures would be required.

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

No Impact. Refer to Response No. 2.c, above.

- 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?**

No Impact. The project site does not contain farmland, forest land, or timberland. Accordingly, the proposed project would not result in the conversion of farmland to non-agricultural uses or forest land to non-forest uses. Therefore, no impacts would occur and no mitigation measures would be required.

Cumulative Impacts

Agricultural and Forest Resources

As with the proposed project, related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and do not support existing farming, agricultural or forest-related operations. Development of the 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 forest land or conversion of forest land to non-forest use. Therefore, impacts on agriculture and forest resources would be less than significant.

Furthermore, as the project would not result in the conversion of State-designated agricultural land from agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use, its contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

3. Air Quality

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Analysis based on the information provided in the project specific air quality and greenhouse gas technical study as well as the project specific traffic study.

Would the project:

a. Conflict with or obstruct implementation of the South Coast Air Quality Management District Plan or Congestion Management Plan?

Less Than Significant Impact. The project site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

Project construction would result in an increase in short-term or temporary employment compared to existing conditions. Construction jobs under the project would generally be small in number, temporary in nature, and filled by local construction workers already living in the Basin, and therefore, would not conflict with the long-term employment projections upon which the AQMP are based.

As discussed below under Section 13, Population and Housing, the location of the project within the Central City North Community Plan Area places the project within the general proximity of public transit. The project site is served by numerous established transit routes. The project is also located within walking distance to the Metro Gold Line Light Rail Chinatown Station and in proximity to other local and regional transit lines. As such, the project would support growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks to improve mobility and access by placing destinations closer together connected by public transportation. The project would directly induce residential population growth by approximately 425 residents and increase employment by 42 persons.

Control strategies in the AQMP, potentially applicable to control temporary emissions from construction activities, include ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards. In accordance with such strategies, the project would use construction contractors that are in compliance with state regulations to reduce emissions from heavy-duty equipment including the California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Under the In-Use Off-Road Diesel Vehicle Regulation, construction equipment fleet operators are required to replace higher emitting models with lower emitting models based on a phased-in schedule with full compliance by 2023 for large and medium fleets (fleets with greater than 5,000 total equipment horsepower or with 2,501 to 5,000 horsepower, respectively) and by

2028 for small fleets (fleets with 2,500 or less total equipment horsepower). The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 (Fugitive Dust). Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

The project is located within a highly urban area with existing roads and services and would not indirectly increase population through new roads or other infrastructure. Project-related population and employment is within the SCAG 2012 RTP/SCS projections which forms the basis of the 2016 AQMP growth projections, as discussed in Section 13, Population and Housing. Because the project is located within direct proximity to transit, the population growth generated by the project would be considered consistent with the City's and SCAG's growth policies. In addition, the project would be consistent with the applicable control strategies of the AQMP. Thus, construction and operation of the project would have no significant impacts related to consistency with the AQMP.

The Congestion Management Program (CMP) was enacted by Metro to address traffic congestion issues that could impact quality of life and economic vitality. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

As discussed in Section 16, Transportation/Circulation, the project is not expected to exceed thresholds at any CMP intersection or freeway segments during any peak hour. As a result, the project would not exceed any CMP thresholds, and no impact to CMP intersections would occur. Thus, the project would not conflict with or obstruct implementation of the CMP.

Based on the above discussion of the applicable air quality plans, implementation of the project would result in less than significant impacts.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. As indicated above, the project site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the project's location. The project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and project occupancy (long-term). However, based on the following analysis, construction and operation of the project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Construction Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul

trips traveling to and from the project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs, (2) 100 pounds per day for nitrogen oxides (NO_x), (3) 550 pounds per day for carbon monoxide (CO), (4) 150 pounds per day for sulfur oxides (SO_x), (5) 150 pounds per day for respirable particulate matter (PM₁₀), and (6) 55 pounds per day for fine particulate matter (PM_{2.5}) (SCAQMD, 2015).

The project would involve demolition of existing uses (i.e., existing building, surface parking lot, and gravel parking/work area) and construction of residential and commercial/office uses. Construction activities would include demolition, excavation, grading, building construction, and architectural coatings. Heavy-duty off-road equipment, such as excavators, loaders, cranes, and paving equipment would be used during construction. Approximately 20 haul trucks per day (total of 500 trucks) during demolition. Site grading and excavation would result in approximately 36,000 cubic yards of soil export with a maximum of 125 haul trucks per day (total 3,000 trucks) during excavation.

Construction is anticipated to begin in the first quarter of 2019 with construction ending in the first quarter of at the end of January 2021. The project is anticipated to be fully operational in 2021. During construction, a variety of heavy-duty diesel powered equipment would be used on-site. Building construction and finishing activities would require equipment such as forklifts and air compressors. Tower cranes would be expected to be electric-powered rather than diesel-fueled, which is typical for these types of equipment. Construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and greenhouse gas (GHG) impacts from land use projects throughout California.²

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the

² See <http://www.caleemod.com>.

mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.1) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be project-specific based on equipment types and the construction schedule. The project would comply with fugitive dust control provisions in SCAQMD Rule 403 (Fugitive Dust) by implementing best available control measures listed in the rule, which would include watering three times daily, limiting vehicle speeds on unpaved roads to 15 miles per hour, and other SCAQMD recommended best available control measures specified in the rule that would meet comparable fugitive dust control standards. Within CalEEMod, compliance with Rule 403 is numerically accounted for in the modeling estimates by utilizing the input parameter to water exposed areas three times daily and limiting vehicle speeds on unpaved roads to 15 miles per hour, which is a standard approach for numerically accounting for Rule 403 compliance. Detailed assumptions and model results are provided in Appendix B of this IS/MND.

This analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions resulting from construction of the project is presented in **Table B-1, Maximum Regional Construction Emissions**, along with the regional significance thresholds for each air pollutant.

TABLE B-1
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) ^A

Construction Activity	VOC	NO_x	CO	SO_x	PM10 ^B	PM2.5 ^B
Demolition	2	26	14	<1	3	1
Grading	3	54	26	<1	3	2
Drainage/Utilities/Trenching	2	13	14	<1	1	1
Foundations/Concrete Pouring	2	16	19	<1	2	1
Building Construction	3	9	23	<1	5	1
Architectural Coating	4	5	13	<1	2	1
Building Construction + Architectural Coating	7	14	36	<1	7	2
Maximum Regional Emissions	7	54	36	<1	7	2
SCAQMD Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table. The less-than-significant air pollutant emissions impacts would be the same as shown in this table.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA PCR, 2017.

As shown in Table B-1, maximum regional emissions would not exceed the thresholds of significance. The emissions include both of onsite equipment and the maximum daily number of haul trucks per day (e.g., up to approximately 125 haul trucks during grading). In addition, the project would be required to comply with SCAQMD Rule 403, as previously discussed. As a result, construction-related impacts would be less than significant.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_x, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_x, (5) 150 pounds per day for PM₁₀, and (6) 55 pounds per day PM_{2.5} (SCAQMD, 2015).

Regional air pollutant emissions associated with project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., natural gas consumption) are classified by the SCAQMD as stationary source emissions while emissions associated with on-road vehicles are classified as mobile source emissions.

Operational emissions for the project were estimated using CalEEMod for the land uses proposed by the project (project emissions). Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and project land uses in CalEEMod, which are Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) for existing trips and proposed project trips, trip generation rates provided in the project traffic study were used (Gibson Transportation Consulting, Inc., 2016). The trips take into account trip reductions from nearby access to public transportation. As discussed previously, the project site is located in proximity to Metro bus routes and rail service. Additional reductions in VMT are calculated based on site-specific characteristics, such as increased job and housing density on the site and proximity to regional job centers, using the equations and methods prescribed in the California Air Pollution Control Officers Association guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures (CAPCOA, 2010). Detailed Assumptions and modeling output are included in Appendix B of this IS/MND.

With regard to energy usage, the consumption of natural gas to provide heating and hot water generates emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and project land uses. Energy usage (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters) for the project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type (CEC, 2016). Since the data from the CEUS is from 2002, the

CalEEMod software incorporates correction factors to account for compliance with the 2013 Title 24 Building Standards Code. The energy use from residential land uses is calculated based on the CEC Residential Appliance Saturation Survey (RASS), which also incorporates correction factors to account for compliance with the 2013 Title 24 Building Standards Code. Because the project would be required to comply with the 2016 Title 24 Building Standards Code, the energy usage for the project is adjusted to take into account the additional reductions that would occur due to compliance with the more stringent 2016 Title 24 Building Standards.

Other sources of emissions from operation of the project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)* (CARB, 2003). The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin. Emissions of VOCs from the use of consumer products and architectural coatings are based on SCAQMD-specific emission factors for land uses in the Basin.

Emissions calculations for the project include credits or reductions for energy efficiency measures that are required by regulation, such as reductions in energy from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements. A summary of maximum daily regional emissions resulting from project operation is presented in **Table B-2, Maximum Regional Operational Emissions**, along with the regional significance thresholds.

TABLE B-2
MAXIMUM REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)^A

Operational Activity	VOC	NO _x	CO	SO _x	PM10	PM2.5
Project						
Area (Consumer Products, Landscaping)	3	2	11	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	2	8	22	<1	6	2
Project Total	4	11	33	<1	6	2
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table. The less-than-significant air pollutant emissions impacts would be the same as shown in this table.

SOURCE: ESA PCR, 2017.

As shown in Table B-2, the project would not generate air pollutant emissions exceeding the SCAQMD thresholds of significance listed above. Therefore, the project would have a less than significant impact on air quality resulting from long-term operational emissions, and no mitigation measures would be necessary.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact with Mitigation Incorporated. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2016 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Basin is currently in non-attainment for ozone (federal and state standards), PM10 (state standards only) and PM2.5 (federal and state standards); therefore, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD.

In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

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 which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) 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

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2016 AQMP. As discussed previously under Issue a., the project would be consistent with the 2016 AQMP and would not have a cumulatively considerable air quality impact.

As the project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above under Response No. 3.b, peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds with the implementation of Mitigation Measure AIR-1.

Mitigation Measure

The following mitigation measure will reduce construction health risk impacts to less than significant.

MM AIR-1 Construction Measures: The project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 final off-road emissions standards for equipment rated at greater than 50 horsepower (hp) during project construction. To the extent possible, pole power will be made available for use with electric tools, equipment, lighting, etc. Tower cranes shall be electric-powered instead of diesel. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

By applying SCAQMD's cumulative air quality impact methodology, implementation of the project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Issue d., below, construction and operation of the project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the project in excess of the SCAQMD project-level thresholds would be less than significant and would not result in a cumulatively considerable air quality impact.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

Localized Construction Impacts

To determine whether or not construction activities associated with the proposed project would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from the proposed project were compared to SCAQMD's localized significance thresholds (LSTs). The LSTs developed by SCAQMD are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts, and only applies to the following criteria pollutants: CO, NO_x, PM₁₀, and PM_{2.5}. The analysis of localized air quality impacts focuses only on the on-site activities of a project, and does not include emissions that are generated offsite such as from on-road haul or delivery truck trips (SCAQMD, 2003).

For the purpose of analyzing localized air quality impacts, SCAQMD has developed LSTs for three project site sizes: one acre, two acres, and five acres. The LSTs established for each of the aforementioned site acreages represent the amount of pollutant emissions that would not exceed the most stringent applicable federal or state ambient air quality standards. As the acreage of the project site is approximately 0.73 acres, the LSTs for a one-acre site are used to determine whether localized air quality impacts on nearby sensitive receptors would result from the project's on-site construction emissions. Under conditions where the project's on-site construction emissions implementing all appropriate mitigation would exceed the LSTs for a one-acre site, air dispersion modeling of the project's construction emissions would be required to evaluate the potential localized air quality impacts of the proposed project on its surrounding off-site sensitive receptors, in accordance with SCAQMD's recommendation. However, under conditions where it is determined that the project's peak daily construction emissions would not exceed the LSTs for a one-acre site, then it can be concluded that the project's construction emissions would not result in any adverse localized air quality impacts on its surrounding off-site sensitive receptors.

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (SCAQMD, June 2003, revised July 2008). The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the project. The closest existing sensitive receptors to the project are as follows:

- North - Immediately north, within the same block as the project site and along the south side of Savoy Street, are two 2-story multi-family residences and a single-family residence. The single-family residence is owned by the applicant and is not occupied. Therefore, the single-family residence is not considered as a sensitive receptor. To the northwest is a two-story office/retail building and surface parking lot for the Li Hing of Hong Kong Inc. Oriental Arts and Crafts Importer commercial establishment. Further north, single-family residences line the north side of Savoy Street.
- East and South - Across North Broadway to the east is the Los Angeles State Historic Park on an approximately 32-acre parcel formerly used as the Southern Pacific Railroad Company's River Station railroad yard. The park is planned as a major open space amenity within the Community Plan Area and buildout is anticipated in 2017. The Gold Line right-of-way is located to the southeast of the project site, running parallel to North Broadway.
- West - Cathedral High School is located to the west, directly across Bishops Road.

Therefore, thresholds used for the LST analysis were based on a one-acre site in the Central Los Angeles Source-Receptor Area with sensitive receptors located adjacent to the project site (i.e., 25 meters).

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized daily significance threshold (LST) methodology. Daily localized emissions caused by the project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards. The project would comply with fugitive dust control provisions in SCAQMD Rule 403 (Fugitive Dust) as previously discussed. A summary of maximum localized construction emissions resulting from project construction is presented in **Table B-3, Maximum Localized Construction Emissions**, along with the localized significance thresholds.

TABLE B-3
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)^A

Construction Activity	NO_x	CO	PM10^B	PM2.5^B
Demolition	18	11	1	1
Grading	24	17	1	1
Drainage/Utilities/Trenching	13	12	1	1
Foundations/Concrete Pouring	13	13	1	1
Building Construction	5	5	<1	<1
Architectural Coating	4	5	<1	<1
Building Construction + Architectural Coating	9	10	1	1
Maximum Localized Emissions	24	17	1	1
SCAQMD Threshold^C	70	680	5	3
Exceeds Threshold?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table. The less-than-significant air pollutant emissions impacts would be the same as shown in this table.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c LSTs are based on a project site area of one acre in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA PCR, 2017.

As shown in Table B-3, Maximum Localized Construction Emissions, maximum daily localized emissions would not exceed the thresholds for NO_x, CO, PM10, or PM2.5 and localized construction impacts would be less than significant.

Construction Health Impacts

The greatest potential for toxic air contaminant (TAC) emissions during construction would be related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment during demolition, excavation and grading, and building construction activities. Construction activities associated with the project would be sporadic, transitory, and short term in nature.

The Office of Environmental Health Hazard Assessment (OEHHA) is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's the Air Toxics Hot Spots Program Risk Assessment (Assembly Bill 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidelines by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). These changes also take into account the sensitivity of children to TAC emissions, different breathing rates, and time spent at home. Children have a higher breathing rate per unit body mass compared to adults. On June 5, 2015, SCAQMD incorporated these guidelines in to relevant rules designed for permitting of stationary sources. Although construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined HRA provided in Appendix B. The HRA was performed in accordance with the OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance) (OEHHA, 2015). The construction health risk assessment was conducted in accordance with the OEHHA Guidance.

During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to off-site sensitive receptors. As the project consists of residential, hotel, and commercial/restaurant uses, the project would not include sources of substantive TAC emissions identified by the SCAQMD or CARB siting recommendations. Thus a qualitative approach to evaluate operational impacts is appropriate.

Source Identification (Construction)

Construction would result in DPM emissions associated with heavy equipment operations during demolition, grading and excavation, and building construction activities. In addition, haul trucks transporting debris and soil to and from the project site would generate DPM emissions. The project would be subject to several SCAQMD rules designed to limit exposure to TACs during construction activities. The project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that requires construction fleet owners and operators to phase in cleaner equipment through retirement, replacement, or repowering of older, dirtier engines with newer emission controlled models. Compliance with these would minimize emissions of TACs during construction.

Emissions Calculations (Construction)

Construction DPM emissions from heavy-duty off-road equipment were modeled using the exhaust PM10 emissions estimated from CalEEMod³ and characterized as line-volume sources within AERMOD. The volume sources were located throughout the project site to represent on-site construction emissions. Off-site DPM emissions from haul trucks traveling within one-quarter mile of the project site were estimated using the CARB on-road vehicle emissions factor (EMFAC) model. The most recent version is EMFAC2014, which “represents ARB’s current understanding of motor vehicle travel activities and their associated emission levels” (CARB, 2016). On-road trucks were characterized as line-volume sources within AERMOD.

Dispersion Modeling (Construction)

Dispersion modeling was performed using the USEPA AMS/EPA Regulatory Model (AERMOD), version 15181. Meteorological data from the SCAQMD’s Downtown Los Angeles monitoring station within Source Receptor Area 1 was used to represent local weather conditions and prevailing winds data. Terrain data from U.S. Geological Survey (USGS) was used to assign elevations to sources and modeling receptors. Sensitive receptors used for modeling were placed at the location of sensitive receptor (i.e., residential) buildings near to the project site. Heavy-duty equipment and trucks were modeled as line-volume sources and were located on the project site and on roadways that trucks would travel on within at least a 0.25 mile distance of the project site.

Cancer Risk and Health Calculations (Construction)

Health risk calculations were performed using a spreadsheet tool consistent with the OEHHA Guidance and CARB Hotspots Analysis and Reporting Program (HARP) version 2 spreadsheet methodology. The SCAQMD significance threshold for determining a significant cancer risk is 10 per one million. The SCAQMD significance threshold for non-cancer health impacts is a Hazard Index of 1.0. Detailed health risk modeling output and calculation results are provided in Appendix B.

Off-Site Cancer Risk Impacts from Construction Emissions

Health risk impacts (cancer risk) were assessed for existing and future off-site sensitive receptors (residential uses). The maximum unmitigated carcinogenic risk for off-site sensitive receptors from DPM emissions from construction of the project is estimated to result in a maximum unmitigated carcinogenic risk of approximately 139 per one million. The maximum impact would occur at sensitive land uses (residences) directly north of the project site. The maximum unmitigated impact to a student receptor at Cathedral High School located at 1253 Bishops Road (west from the project site and across Bishops Road) would be approximately 28 per one million. As discussed previously, the lifetime exposure under OEHHA Guidance takes into account early

³ Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed Project with 89,629 square feet of floor area and 118 residential units. Therefore, the Project emissions would be similar to or slightly less than estimated in the CalEEMod calculations. The health risk assessment impacts would be similar to or slightly less than discussed herein. As discussed on the following pages, implementation of the same mitigation measure (MM AIR-1) would reduce the potentially significant impact to less than significant.

life (infant and children) exposure. It should be noted that the calculated cancer risk conservatively assumes sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration. As the maximum impact would potentially exceed the risk threshold of 10 in one million, impacts would be considered potentially significant and mitigation measures would be required. Implementation of the recommended Mitigation Measure AIR-1 would reduce project construction impacts to less than significant.

Off-Site Non-Cancer Impacts from Construction Emissions

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. Non-cancer health impacts for DPM are associated with include chronic (annual) exposures. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. For non-cancer chronic (annual) exposures, the maximum chronic (annual) health impact from project construction would be a Hazard Index of approximately 0.2 (respiratory irritant) compared to the threshold of 1.0. As a result, non-cancer health impacts from construction of the project would be considered less than significant.

Implementation of Mitigation Measure AIR-1 would substantially reduce emissions of DPM from on-site heavy duty equipment. Equipment certified to the Tier 4 standards are commercially available and construction fleet operators and owners are in the process of incorporating Tier 4 equipment into their fleets as part of compliance with the CARB emission standards for off-road diesel construction equipment regulation, adopted on July 26, 2007, which aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (Title 13 California Code of Regulations, Section 2449). The maximum mitigated carcinogenic risk for off-site sensitive receptors from the mitigated DPM emissions from construction of the project is estimated to result in a maximum mitigated carcinogenic risk of approximately 9.4 per one million. The maximum impact would occur at sensitive land uses (residences) directly north of the project site. The maximum mitigated impact to a student receptor at Cathedral High School would be approximately 1.8 per one million. As the maximum mitigated impact would not exceed the risk threshold of 10 in one million, impacts would be mitigated to less than significant. The less-than-significant non-cancer chronic (annual) health impact from project construction would also be further reduced to a Hazard Index of approximately 0.01 (respiratory irritant) compared to the threshold of 1.0. Detailed mitigated health risk modeling output and calculation results are provided in Appendix B.

Localized Operational Impacts

The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized operational emissions thresholds for the project, as detailed under the *Localized Construction Impacts* analysis above. With regard to on-site sources of emissions, the project would generate emissions resulting from sources such as natural combustion (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters) and landscaping equipment. In addition, because there is an onsite parking structure, a portion of mobile source emissions are anticipated to occur on-site. To account for these emissions, it was conservatively assumed that each vehicle would travel a

quarter mile onsite. A summary of maximum localized operational emissions resulting from project construction is presented in **Table B-4, Maximum Localized Operational Emissions**, along with the localized significance thresholds.

TABLE B-4
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS^A

Operational Activity	NO _x	CO	PM10	PM2.5
Project				
Area (Consumer Products, Landscaping)	2	11	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Mobile (vehicle emissions)	<1	1	<1	<1
Project Total	3	12	<1	<1
SCAQMD Threshold^b	75	680	2	1
Exceeds Threshold?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table. The less-than-significant air pollutant emissions impacts would be the same as shown in this table.

^b LSTs are based on a project site area of 2 acres in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA PCR, 2017.

As shown in Table B-4, on-site sources of emissions would remain below SCAQMD LST thresholds and localized operational impacts would be less than significant.

Carbon Monoxide Hotspots

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found in proximity to congested roadway intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (i.e., congested intersection) increases. For the purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed at congested intersections, because if impacts are less than significant in proximity of the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

Carbon monoxide decreased dramatically in the Basin with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin in recent years and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Localized areas where ambient concentrations exceed state and/or federal standards are termed “CO hotspots”. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily

disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions.

Project traffic has the potential to create local area CO impacts. The potential for the project to cause or contribute to CO hotspots is evaluated by comparing impacted project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence that the project would not cause or contribute to the formation of CO hotspots, that CO concentrations at project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

The SCAQMD recommends a hotspot evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. Based on the traffic impact analysis prepared for the project (summarized in Section 16, *Transportation/Circulation*), several intersections operate at LOS D or worse during A.M. and P.M. peak hours. However, the project would not meet the SCAQMD criterion of hotspot evaluation because it would not increase the V/C ratio by 2 percent. Therefore, additional localized CO analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day (SCAQMD, 2003). This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.⁴ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

In comparison, based on the Traffic Study prepared for the project, of the studied intersections that are predicted to operate at a Level of Service (“LOS”) of D, E, or F under future year 2020 plus project conditions, average daily traffic volumes would result in fewer than 100,000 vehicles per day (Gibson Transportation Consulting, Inc., 2016). Therefore, CO concentrations are expected to be less than the CO concentrations measured as part of the AQMP CO attainment demonstration and would not exceed SCAQMD significance thresholds. This comparison provides evidence that the project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the project would result in less than significant impacts with respect to CO hotspots.

⁴ The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

The proposed parking structure would be built in accordance with applicable City of Los Angeles Municipal Code requirements, and as such, would be required to provide adequate mechanical ventilation and dispersion of potential emissions to acceptable ambient concentrations so as not pose any public health hazards. Therefore, the parking structure would result in less than significant impacts with respect to CO hotspots.

Operational Health Impacts

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The project would not include any of these potential sources, although minimal emissions may result from the use of consumer products. Project operations would generate only minor amounts of diesel fuel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO_x emissions from existing diesel trucks. Therefore, project operations are not considered a substantial source of diesel particulates.

In addition, project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. Additionally, it is not anticipated that an emergency back-up generator would be part of the project development. However, if a generator was implemented, it would typically only be used during emergencies and may be turned on periodically for maintenance and inspection purposes. Further, emergency back-up generators are subject to SCAQMD regulatory requirements, which limit the allowable emissions to a level below that which would result in a significant impact. As such, the periodic operation of the backup generator at the project site would not expose surrounding sensitive receptors to substantial pollutant or TAC emissions. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site.

The California Environmental Quality Act (CEQA) does not include provisions for evaluating the existing environments potential impact on a project, but only the potential impacts from the project on the environment [see Public Resources Code Section (PRC) 21002.1 (a); PRC Section 21061; PRC Section 21068; and CEQA Guidelines Section 15382). Therefore, there are no CEQA thresholds for determining level of significance under CEQA with respect to health impacts on residential developments from exposure to TAC emissions associated with a nearby freeway or high volume roadway.

The City of Los Angeles Planning Commission has considered the implications of living in proximity to freeways. At the request of the Planning Commission, Planning staff prepared an advisory notice to alert applicants to consider public health implications of freeway-adjacent projects (project within 1,000 feet of a freeway) (City of Los Angeles, 2012).

Currently, the SCAQMD has only developed significance thresholds that apply to single stationary and mobile sources of TAC emissions, such as projects involving truck stops or warehouses (SCAQMD 2003). However, in absence of a threshold specific to assessing health impacts from a freeway, the SCAQMD's stationary source TAC thresholds of 10 in one million

for cancer risk and 1 for hazard index would serve as the most appropriate thresholds for use in this type of health risk analysis.

With regard to on-site sensitive receptors, CARB suggests that a health risk assessment be conducted where new development places sensitive receptors within 500 feet of an existing high volume roadway and the City of Los Angeles extends this to 1,000 feet. A high volume roadway is defined as an urban roadway with more than 100,000 vehicles per day. While the proposed project is within 850 feet of State Route 110 (SR 110), based on the Caltrans data, truck traffic on the portion of SR 110 are minimal as large trucks are generally prohibited from traveling on the portion of SR 110 north of Interstate 101. According to traffic data from the California Department of Transportation (Caltrans) Traffic Data Branch, 2015 average daily truck traffic on the segment of SR 110 near to the project site (SR 110 at the Stadium Way overcrossing) was approximately 1,036 trucks with only approximately 22 of these trucks consisting of five or more axels (i.e., heavy-heavy-duty trucks) (Caltrans, 2015). For comparison purposes, based on Caltrans 2015 data, SR 110 south of Interstate 10 has over 12,000 average daily truck traffic with more than 1,400 of these trucks consisting of five or more axels. Other freeways in Los Angeles have comparatively larger truck traffic volumes than the portion of SR 110 near to the project site, such as Interstate 101 at the SR 110 interchange, which based on Caltrans 2015 data, has over 8,700 average daily truck traffic with more than 2,200 of these trucks consisting of five or more axels. Therefore, while locating sensitive uses in proximity to other freeways in Los Angeles may warrant a detailed health risk assessment, the exposure to diesel emissions from truck traffic would be extremely minimal along SR 110 near to the project site and a detailed health risk assessment is not warranted. The next closest freeways to the project site are SR 101 and I-5, which are located far from the project site at approximately 5,200 and 4,200 feet away, respectively. Therefore, the proposed project would not place new sensitive receptors within 1,000 feet of a high volume roadway and is not anticipated to be adversely affected by proximity to exposure to diesel exhaust emissions.

Based on the uses expected on the project site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance. Additionally, new onsite sensitive receptors would not be located within the buffer distance of any major TAC-emitting facilities, including being within 1,000 feet of any freeway or major roadway with more than 100,000 vehicles per day. Therefore, impacts would be less than significant

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The closest existing sensitive receptors to the project are multi-family residential uses to the north, adjacent to the project site. Potential sources that may emit odors during project construction activities include diesel trucks and equipment and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a listed source of odors. Compliance with existing regulations, including the CARB anti-idling regulation that limits idling to five minutes or less at any location would minimize the potential for odorous emissions. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents. Through

adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors and impacts would be less than significant.

The project's proposed uses are not expected to generate nuisance odors at nearby sensitive receptors during operation. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As a mixed-use development consisting of residential and office/commercial uses, the proposed project does not include any of these uses that have been identified as being associated with odors. Thus, the proposed project is not expected to result in objectionable odors for the neighboring uses.

Cumulative Impacts

Air Quality

There are a number of related projects in the project area that have not yet been built or are currently under construction. Since the applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to project operations, SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in non-attainment for ozone, PM10, and PM2.5, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

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 which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) 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

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2016 AQMP. The project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality.

As displayed in Tables B-1 through B-3, regional emissions calculated for project construction and operations would be less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the project site is located in a region that is in non-attainment for ozone, PM10, and PM2.5, the emissions associated with the project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds with the implementation of regulatory requirements including SCAQMD Rule 403 (Fugitive Dust) and Mitigation Measure AIR-1. In addition, the project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

With respect to health impacts, implementation of regulatory requirements including SCAQMD Rule 403 (Fugitive Dust) and Mitigation Measure AIR-1 would ensure project construction health risks would be less than significant and cumulative projects would also be required to implement similar measures, as necessary under CEQA, to mitigate impacts to less than significant. Compliance with applicable SCAQMD rules would ensure project operational health risks would be less than significant and cumulative projects would also be required to comply with applicable rules as well as implement mitigation measures, as necessary under CEQA, to mitigate impacts to less than significant. As a result, the project would not result in cumulatively considerable health impacts. Compliance with applicable rules for odors would also ensure that the project and cumulative projects would not result in cumulatively considerable odor impacts.

4. Biological Resources

Portions of the following impact analysis pertaining to biological resources are based on information contained in the Tree Report prepared by Carlberg Associates on October 20, 2016. The Tree Report is included as Appendix D of this IS/MND.

Would the project:

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

No Impact. The project site is located in a highly urbanized area and is currently developed with a single-story office building and surface parking. As stated in the Tree Report, provided in Appendix D of this IS/MND, there are six non-protected trees present within the project site boundaries, including a Strawberry Tree (*Arbutus unedo*), Pomegranate Tree (*Punica granatum*), Dragon eye (*Dimocarpus longan*), Citrus (*Citrus spp.*), and Italian cypress (*cupressus sempervirens*). Additionally, there is an Australian willow (*Geigera paviflora*) located within the City of Los Angeles right-of-way (Carlberg Associates, 2016). No other trees or open space is located on the project site. The project site does not contain habitat suitable for native species and does not contain candidate, sensitive, or special-status species. Therefore, no impacts to candidate, sensitive, or special-status species would occur.

- 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?**

No Impact. The project site is developed with an existing office building and associated surface parking lot and does not contain riparian habitat or sensitive natural communities. The project site is not located within or adjacent to a significant ecological area (SEA) (City of Los Angeles, 2001). Therefore, implementation of the proposed project would not result in a substantial adverse effect on riparian habitat or other sensitive natural community and no mitigation measures are required.

- 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?**

No Impact. The project site is developed and the pervious areas are landscaped with non-native species and do not contain wetlands defined by Section 404 of the Clean Water Act. Therefore, project implementation would not impact Federally protected wetlands. No impacts would occur and no mitigation measures are required.

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?

Less Than Significant Impact With Mitigation Incorporated. The project site is currently developed and located in a highly-urbanized area the City of Los Angeles. No wildlife corridors or native wildlife nursery sites are present on the project site or in the surrounding area. Further, due to the urbanized nature of the project area, the potential for native resident or migratory wildlife species movement through the site is negligible.

Nonetheless, the project site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Mitigation Measure BIO-1 provided below would reduce this impact to a less than significant level.

Mitigation Measure

MM BIO-1: The applicant shall be responsible for the implementation of mitigation to reduce potential impacts to migratory and/or nesting bird species to below a level of significance through one of two ways.

Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., street trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Building and Safety. If any active nests are detected, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

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)?

Less Than Significant Impact. There are no native tree species within the project site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1. Subdivision 12 of Subsection A of Section 12.21, as amended). The two City right-of-way trees on North Broadway would be preserved and protected during the construction process. The City may request that a fence protect the trees' dripline if equipment access is adjacent to the trees. Three trees located on the contiguous property to the northwest and northeast would not be removed, but may be affected by the proposed construction (Carlberg Associates, 2016).

All street trees removed by the proposed project would be replaced, in accordance with the applicable provisions of the City of Los Angeles Street Tree Ordinance, or as otherwise necessary per City requirements. City regulations require that prior to the issuance of any permits, 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. Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. 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. The City's Street Tree Ordinance requires all significant, non-protected trees to be replaced at a minimum of 1:1 ratio with a minimum 24-inch box tree. The number of street trees proposed by the proposed project would meet or exceed the requirements of the City's Street Tree Ordinance. The final number and location of street trees would be determined in consultation with the City's Urban Forestry Division. Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. 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. Compliance with applicable City Street Tree Ordinance provisions and LAMC requirements would ensure that impacts are less than significant.

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?

No Impact. As discussed above, the project site is not located within a SEA. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the project site. Therefore, implementation of the proposed project would not conflict with a habitat conservation plan and no mitigation measures are necessary.

Cumulative Impacts

Biological Resources

With regard to cumulative biological resources impacts, the project site is located in an urbanized area and the majority of developments occurring in the project vicinity would occur on previously disturbed, urbanized land. The proposed project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect in these regards. The proposed project would fully comply with City ordinances pertaining to tree removal. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measure. Related projects would also be required to comply with the City's tree requirements and to implement mitigation for impacts to nesting birds. Therefore, cumulative impacts to biological resources would be less than significant.

5. Cultural Resources

A Phase I Cultural Resources Assessment was prepared in support of the IS/MND. The study included archival research for archaeological, paleontological, and historic resources within the study area. A records search was conducted on December 7, 2016 at the South Central Coastal Information Center (SCCIC) housed at the California State University, Fullerton. The records search revealed that a total of 27 cultural resource investigations have previously been conducted within a 0.5-mile radius of the project site. A total of 12 historic archaeological resources have been recorded within the 0.5-mile radius of the project site. A review of previously recorded historic architectural resources within 0.25-mile of the Project site was completed which resulted in the identification of eight historical resources, of which two are within close proximity to the project site and would have direct and indirect views of the project site. In addition, ESA conducted extensive historic map research of the project site and vicinity.

As part of this investigation, ESA contacted the Native American Heritage Commission (NAHC) requesting that a Sacred Lands File check be conducted for the proposed project and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the study area. The response received on December 2, 2016 indicated that the Sacred Lands File check was negative, however the area is sensitive for cultural resources. The letter also included an attached list of Native American contacts. A cultural resources field survey of the study area was conducted and focused on areas that would be potentially impacted by the proposed project and included survey and documentation of the built environment,

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA §15064.5?

Less Than Significant Impact. On December 7, 2016, a cultural resources records search was conducted at the California Historical Resources Information System South Central Coastal Information Center (SCCIC), California State University, Fullerton. As a result, ESA identified six previously surveyed historic architectural resources within a quarter-mile radius of the project site and two California Historical Landmarks outside of the quarter-mile radius. Furthermore, out of these eight resources, two (P-19-175256 and P-19-170956) are located within proximity to the project site and would have direct and indirect views of the project site. The remaining six historic architectural resources would not have direct or indirect views of the project site as they are located at a distance of 0.16 miles (838 feet) to 0.45 miles (2,400 feet) away from the project site and are not considered further in this assessment.

The historical and architectural significance of the automobile dealership and repair shop, the Basso Autos Building, located at 1201 North Broadway within the project site was recorded and evaluated, including the construction and alteration history, the original owner Domenich Basso, the contractor Pozzo Construction, and the history of the surrounding neighborhood's development.

The project site is situated in the Buena Vista Tract (Tract), surveyed in May 1886, was a street car neighborhood, as the Los Angeles Railway ran along North Broadway. The earliest Sanborn Map available depicting the project site is 1894. This map indicates that the Tract was developed primarily with single-family residences with the Old Calvary Cemetery immediately southwest of the project site and the River Station to the south and southeast.

After World War I, the character of the project site and vicinity was an area in transition. The west-side of North Broadway, formerly Buena Vista Street, shifted from being primarily improved with residences to improvements associated with commercial uses. Three of the four residences on the project site were relocated to make way for the construction of the auto dealership and repair shop. The new auto dealership and repair shop, improved on the project site in 1924, was responding to the increased popularity of the automobile and automobile traffic along North Broadway, one of the main routes to downtown (KCET, 2014). Cathedral High School was also built on the grounds of the Old Calvary Cemetery in the mid-1920s.

The current improvements on the project site, along with the construction of commercial buildings instead of residential structures along North Broadway, exemplify the development patterns associated with the popularity of the automobile during the 1920. The construction of the Basso Autos Building on the project site in 1924, an automobile dealership and repair shop, catered to the City's newest form of transportation, the automobile. Designed to catch the eye of motorists driving along North Broadway, the Basso Autos Building, was a new property type that emerged in the 1920s.

The greatest changes to the project site and Vicinity occurred after Dodger Stadium was built in the early 1960s. Dodger Stadium was constructed between 1959 and 1962 on Chavez Ravine, north of the 110 and the project site (KCET, 2013). The 1964 Sanborn Map shows Bishop Road was renamed to Stadium Way and was perhaps directly link North Broadway to the new stadium. During this period Lot 11, adjacent to the project site, a two-story apartment building was torn down sometime between 1960 and 1964 to make way for a parking lot associated with the Basso Autos Building. By the 1965 Sanborn Map all of the single-family residences along the west-side of North Broadway were demolished and in their place were empty lots, commercial buildings, and multi-family residences. The 1965 and 1968 Sanborn Maps reflect similar conditions to what was presented on the 1965 Sanborn Map. The project site retained its associations with the automobile until 2004 when the Basso Autos Building was sold to an architecture firm that adapted the building into an architectural office.

The building permits on file with the Los Angeles Department of Building and Safety (LADBS) were reviewed to determine the history of construction and alterations of the Basso Autos Building at 1201 North Broadway. The Basso Autos Building is one building comprised of three additions built in 1924, 1937, and 1946. Preparation for the initial construction required the relocation of two houses with the addresses of 1201 North Broadway and 1211 North Broadway, which were moved to 940 New Depot Street and 942 New Depot Street per permit records. Following the house relocations, a permit was issued on February 28, 1924 for construction of a one-story building including a garage and two-room showroom measuring 80 by 140 feet on lots 7 and 8. The 16 foot high building was to have cement floors and be constructed by Pozzo

Construction Company for Domenich Basso who would remain listed as owner until 1969. In 1927, another residence on an adjacent site (Lot 9) at 1209 North Broadway was also relocated to 440 Savoy Street within the same tract most likely to create a parking lot for the auto dealership and repair shop.

In 1931 three minor alterations were made to the Basso Autos Building most likely to the interior. In June, two projects were permitted with Pozzo Construction: the first included the construction of a parts department within the interior measuring 12 x 20 feet and second included the addition of two 6 x 9 feet interior offices.

In 1936, the house on the adjacent property at 1215 North Broadway was moved to 215 Devonshire Street, allowing the building to continue to expand. One year later, a building permit was filed in November 1937 for a rear addition (50 x 80 feet) onto the existing garage by Row Construction Company and architect Armand Monaco. This rear addition onto the south elevation of the Basso Autos Building had a concrete foundation and floors, brick exterior wall, reinforced concrete framework, and a composition roof.

The last major addition to the Basso Autos Building was added onto the east elevation infilling the parking lot in February 1946, again with Pozzo Construction and architect Armand Monaco using engineer Hillman and Nowell. The new garage addition was to measure 83'6" x 139'6" with no construction cost noted. This is most likely when the look of the primary façade was updated to the Mid-Century Modern style. Modifications were made to the existing the original portion of the 1924 building so that ceilings in this new addition could align with the older structure: The wood lath and plaster ceiling in the existing showroom was removed and a new plasterboard and plaster ceiling was installed to match the new ceiling, a change affecting an area measuring 25 x 58 feet and 12 x 16 feet for a total of square footage of 1,816.

Between June 1961 and 1989, a number of small revisions and repairs were made to the Basso Autos Building which continued to serve as an automobile dealership and service facility owned by Domenich Basso or his company. In June 1961 Pozzo Construction carried out unidentified work to comply with building requirements; in September 1961 Pozzo Construction repaired the parapet adjacent to Broadway and Bishop Street on the north side of the building. In April 1962 an addition to the roof structure was made by George J. Fosdyke as engineer. In June 1962 with contractor Heath and Company and engineer James A. Lynch, 257 square feet (sf) of illuminated signs were added. In 1965, two permits were issued: in February Pozzo Construction with E. Aillman engineer installed air conditioning equipment on the roof and in June Advance Neon Sign installed a wall sign. In January 1969, interior partitions were installed by Edward M. Pozzo Company. In November 1988, construction to achieve full compliance with Division 88 seismic requirements was permitted with Edward M. Pozzo as contractor and Dennis S. Wish as engineer. In this year, ownership changed to Alberta Bocalero and Alma Connolly, Basso's daughters. In 1989, Randol Roofing re-roofed the north half of the showroom with triple-ply fiberglass roofing.

No additional changes were made to the building until 2004 when the building was under the ownership of Johnson Fain. Per permits in January and March, the building changed use from paint storage and garage to an architectural office. Under Johnson Fain's ownership, Minardos

Construction with Nabih Youssef and Fouad Guirg engineers carried out the structural retrofit that added beams and columns for support of the existing mezzanine, added new roof equipment, and changed elevation finishes. In 2007, a permit was issued for interior remodel with Intro Construction Company and architect Larry Roy Ball. Under this scope of work the alterations included the construction of partitions for storage and offices, as well as the construction of equipment rooms without removing any structural walls.

ESA evaluated the subject property under the following historical and architectural themes which are identified in SurveyLA's Los Angeles Citywide Historic Context Statement: Commercial Development and the Automobile (1910-1980): Car Showroom. The period of significance for the Basso Autos Building under this theme is defined as 1924, the date of the initial construction, to 2000, the end of the Basso family ownership of the auto dealership and repair shop. As a result of its investigations, ESA recommends the current improvement on the project site, the Basso Autos Building, ineligible under all of the applicable federal, state, and local criteria as the property lacks both significance and integrity. In its present condition, due to a lack of integrity, the Basso Autos Building does not convey a significant association with commercial development associated with the automobile, the car showroom property type, and Domenich Basso. Therefore, ESA recommends 1201 North Broadway not be considered a historical resources pursuant to CEQA and be assigned California Historical Resource (CHR) status codes of 6Z, noting them as ineligible for listing in the National Register of Historic Places (National Register or NR) and California Register of Historical Resources (California Register or CR), as well as local designation as a Historic-Cultural Monument (HCM), through survey evaluation.

Because ESA recommends the Basso Autos Building ineligible as an individual historical resource pursuant to CEQA, the project would have no direct impacts to historical resources on the project site. Indirect impacts were analyzed to determine if the project would result in a substantial material change to the integrity of the historical resources and their immediate surroundings that would detract from the significance of historical resources within the project vicinity. Located within a dense, urban setting, with limited visibility, the archival records search was conducted to capture all known historical resources within the immediate vicinity of the project which may have views of the project site for the purpose of analyzing potential indirect impacts. Of the eight historical resources within a quarter-mile radius of the project site, only two historical resources are located within proximity to the project site and would have direct and indirect views of the project site: Cathedral High School (P-175256) and 437 Savoy Place (P-19-170956). As a result of the indirect impacts analysis, the construction of the project would not erode the historical setting of Cathedral High School or 437 Savoy Street or block historical view sheds. After project completion, both Cathedral High School and 437 Savoy Street, would retain integrity and remain eligible as historic resources. Therefore, there would be no indirect impacts to historical resources with direct and indirect views of the project.

Therefore, the proposed project would result in less than significant impacts to historical resources and no mitigation measures are required.

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

Less Than Significant After Mitigation Incorporated. Review of previous investigations in the vicinity of the project, as well as review of the prehistoric context for the area provides an understanding of the potential for encountering prehistoric archaeological resources in the project site. When completing analysis of buried archaeological site sensitivity, important factors to consider include elevation, soil conditions, proximity to water, proximity to raw materials, and ethnographic and historic information. It is also necessary to evaluate the subsequent land use in determining the possibility for the preservation of prehistoric archaeological materials.

Archaeological Sensitivity

The project site's location relative to the Los Angeles River would have provided access to important resources during all periods of prehistory. The location of the prehistoric villages of *Yangna*, and *Maawnga* have long been rumored and documented as being located near the Project area. Ethnographic evidence seems to indicate that the village of *Maawnga* was more likely the village located within the nearby Elysian Park and may have been the villagers that served refreshments to Gaspar de Portola and Father Juan Crespi when they were camped on the river bank opposite the North Broadway Bridge entrance to Elysian Park. Sources say that the village site of *Yangna* encountered by the Portola expedition in 1769 was situated in close proximity to the north of the current Los Angeles Plaza Church (Morris et. al. 2016:97). Although the current project site is just over a quarter of a mile to the southwest of the California Historic Landmark Number 655, the Portola Trail Campsite, it is unlikely that *Yangna* was located at the trail campsite or overlapping with the project site based on known information about the location of the village at contact.

Nonetheless, due to the project site's proximity to the river which was which was heavily exploited by prehistoric peoples over time and seasonally, there is potential for encountering prehistoric archaeological resources. The project was likely within the flood zone of the Los Angeles River, a location where deposition could have buried archaeological resources. Although the site has been subjected to nearly two centuries or more of residential and urban development, areas of older historic development are less likely to disturb prehistoric sites at depths in this area.

Calvary Cemetery

The project site is located immediately across Bishops Road from the former location of the first Calvary Cemetery (also known as Campo Santo, and later know as Old Calvary Cemetery) which was blessed in 1844. The location is now the site of the Cathedral High School. Prior to the opening of the Old Calvary Cemetery in 1846, the only operating burial ground was located at the Plaza Church which was in use from 1822 to approximately 1844 based on information acquired from San Gabriel Mission records (Carpenter 1973). The project site is located less than a mile to north of the Plaza Church.

Preparations for the Old Calvary Cemetery are known to have begun with the construction of an adobe building and a receiving vault or chapel conducted by prison labor (Carpenter 1973;

Berman 2009). Eventually with the fear of the spread of smallpox from Santa Barbara, on July 8, 1844, Father Tomás Estenaga expressed his intentions in a letter and wishing to bless the site as soon as it was fenced off. The Old Calvary Cemetery was blessed in 1844 by Father Estenaga on All Souls Day; but “formally consecrated” in 1866 by Bishop Thaddeus under the name of Calvary Cemetery (Carpenter 1973:14, 15).

The preparations at the site included an adobe building and a receiving vault or chapel. The Los Angeles Times in 1902 (pg. C1) noted that an old adobe wall which surround the original plot, and was begun in 1839. There is no specific information from this time period regarding the fencing of the cemetery. Although Carpenter (1973) notes an incident in 1856 regarding a non-permitted Catholic burial occurred illegally. During that time, it was mentioned that the fence should be taken down and the cemetery enclosed within a substantial brick wall. The original plot is demarcated on an 1858 survey map which also shows an expansion of the cemetery eastward and westward. The cemetery as shown in 1858 does not appear to overlap with the project site, however this deed map was dated many years after the opening date of the original plot. Later maps from 1868 depict the cemetery as extending further to the southwest but also lining up with the current configuration of the Bishops Road. A parcel map from 1866 also shows the cemetery lined up to Bishops Road and adjacent to the project site.

Photos of the Calvary Cemetery in 1870 shows a view toward the City at Bishops Road and North Broadway. The photo shows that the cemetery is fenced and Bishops Road appears to be in the foreground with the project site on the lower left. Aerial photos from the 1920's show the cemetery after closure. Grave stones and mausoleums are visible and new buildings for Cathedral School to appear in the northwest corner in 1928, while presumably burials were still being removed from the cemetery.

Early Los Angeles Water Systems

The Los Angeles *zanja madre* has been mapped extensively on historic maps running roughly parallel to what is now the south side of North Broadway in the Project vicinity. A segment of the *zanja madre* was encountered in 2005 and has been preserved in place 175 feet south of the project site and does not occur within the project site, nor will it be affected by the project.

Historic research indicated that there was a small reservoir “near the cemetery”, which appears on an 1868 map and later maps from 1923. The parcel adjacent to the northwest of Buena Vista Tract is owned by the L.A. City Water Co. and may indicate the former location of the reservoir more exactly than the earlier maps. There is potential for encountering historic water conveyance features related to the reservoir and ancillary pipelines, as well as related to ancillary portions of the *zanja* system which may have overlapped with the project site. Building materials for the *zanja* system included earthen ditches, wooden troughs, and brick or cement conduits. Building materials for ancillary pipelines to the reservoir included metal and wooden conduits. Some portions of the *zanja* system that have been identified archaeologically have revealed a complex sequence of construction and modification related to maintenance over a long period of use.

Historic Residential

During the great boom of the 1880's the project site was subdivided in 1886 into the Buena Vista Tract which was developed with single-family residences until the 1920's when the auto dealership and repair shop were constructed. When the residential structures were moved or razed in order to make way for the auto dealership and repair shop there may have been remains of building foundations and associated features such as trash deposits, privies, wells, and other outbuildings which could be capped beneath the current building and paved parking lot.

Mitigation Measures

The project site lies under the current 1920's building complex and pavement. Research has revealed high archaeological sensitivity of the project site due to the current and former development of the site as well as the presence of a historic cemetery adjacent to the project and other historic infrastructure which may have overlapped with the project area. In particular, there is potential for encountering historic cemetery features, historic water conveyance features, and foundations and associated remains of the single-family residences moved from the project area. In addition to potentially uncovering historic period archaeological resources, unearthing buried sites related to prehistoric activities in the project area, while unlikely is also possible.

While the project site and the Calvary Cemetery show up on a multitude of early maps of the City, as well as bird's eye views and parcel and deed maps, the cemetery appears to have several different configurations between the various sources on some of the maps the cemetery is shown as having boundaries occurring outside of the project area. However, it appears that prior to 1870 the project area was vacant or agricultural land.

The official boundaries of the cemetery do not appear to overly the project site, however, it remains possible that before the cemetery was properly fenced, in the later years of decay, or perhaps illegal burials placed outside of the walls before Bishops Road was well defined, could occur within the project site. Historic development on the site did not include basements and may not have disturbed such features should they exist within the project area.

Based on the results of the archival research, it is possible that prehistoric and historic archaeological resources may be present within the project site. Such resources may lie beneath the surface obscured by development and pavement. As a result, the proposed project could adversely affect archaeological resources. To mitigate these potential impacts, mitigation measures CUL-1 through CUL-5 are provided. With incorporation of these mitigation measures, potentially significant effects on archaeological resources pursuant to §15064.5 would result in a less-than-significant impact.

MM CUL-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The qualified archaeologist shall provide technical and compliance oversight of all work as it relates to archaeological resources, shall attend

the project kick-off meeting and project progress meetings on a regular basis, and shall report to the site in the event potential archaeological resources are encountered.

MM CUL-2: The qualified archaeologist shall conduct construction worker cultural resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of archaeological resources that could be encountered within the project site, working with on-site cultural resource monitors, and the procedures to be followed if cultural resources are found. Documentation shall be retained demonstrating that all construction personnel attended the training.

MM CUL-3: Because of the potential to encounter archaeological resources exists for the proposed project, it is required that a Cultural Resources Monitoring and Mitigation and Treatment Plan be developed prior to the issuance of a grading permit for the project. The plan will outline and expand upon construction monitoring procedures, as well as a cultural resources treatment plan, in the event that cultural resources are encountered. As part of the Cultural Resources Monitoring and Mitigation and Treatment Plan, the construction contractor will use a qualified archaeological monitor, working under the supervision of a qualified archaeological Principal Investigator during ground disturbing activities including, but not limited to, demolition of foundations and footings, trenching, grading, and over excavation within the project area. Ancillary construction which may occur within Bishops Road and/or North Broadway to change the curb and gutter as well as any utilities work for the project will be monitored. The monitor will conduct worker training prior to the initiation for ground-disturbing activities in order to inform workers of the types of resources that may be encountered and advise them of the proper handling of such resources. The archaeological monitor will have the authority to redirect construction equipment in the event potential archaeological resources are encountered. In the event archaeological resources are encountered, the client will be notified immediately and work in the vicinity of the discovery will halt until appropriate treatment of the resource, as outlined in the treatment plan is determined by the qualified archaeological Principal Investigator in accordance with the provisions of CEQA.

The treatment plan will compile existing information, discuss the types of resources which may be encountered, and provide research themes and treatment approaches in order to avoid or mitigate significant impacts to potentially significant archaeological resources as determined to possibly within the project area including water conveyance systems, features related to Calvary Cemetery, and historic residential features. The treatment plan will also outline protocols to follow for unanticipated discoveries.

MM CUL-4: If any prehistoric archaeological sites are encountered within the project area, or human remains encountered, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources prior to the implementation of any treatment of the resource.

MM CULT-5: The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical

Resources and in accordance with the Cultural Resources Monitoring and Mitigation and Treatment Plan. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

c. Directly or indirectly destroy a unique paleontological resource or unique geological feature?

Less Than Significant Impact With Mitigation Incorporated. A paleontological database search for fossil localities and fossil-bearing sediments located within the project site and vicinity was requested on December 1, 2017 from the Natural History Museum of Los Angeles County (LACM). Furthermore, the site has also been the subject of a geotechnical study (Geotechnologies, Inc., 2016), the results of which were reviewed and incorporated into the analysis.

Results of the paleontological resources records search indicated that The Quaternary older alluvial (Qoa) sediments, which underlie the surficial alluvium in the Project area, have yielded fossils of numerous animals, including turkey, *Meleagris californicus*, sabre-toothed cat, *Smilodon fatalis*, horse, *Equus*, and deer, *Odocoileus*, at an unknown depth from near the intersection of Workman Street and Alhambra Avenue, southeast of the project area (McLeod, 2016; Steadman, 1980). Near the intersection of Mission Road and Daly Street another Quaternary locality has yielded specimens of pond turtle, *Clemmys mamorata*, ground sloth, *Paramylodon harlani*, mastodon, *Mammuth americanum*, mammoth, *Mammuthus imperator*, horse, *Equus*, and camel, *Camelops*, at a depth of 20-35 feet below the surface. (Brattstrom and Sturn, 1959; McLeod, 2016).

The Puente Formation (Tush, Tuss), which is present in the subsurface below the alluvial sediments in the Project site, has also produced numerous significant fossils in the project vicinity. Between the Los Angeles River and Interstate 5, to the northeast of the project site, a specimen of the fossil snake mackerel, *Thyrsocles kriegeri*, was recovered from a sewer street shaft at a depth of about 100 feet below the surface (McLeod, 2016). To the northwest of the project site in Elysian Park the holotype specimen of the extinct fossil herring *Clupea tiejei* was discovered (David, 1943; McLeod, 2016). South of the project site at the intersection of 1st Street and Hill Street a site produced fossil specimen of the deep sea fish Bristlemouth, *Cyclothone* (McLeod, 2016). Further north of the project site, between Figueroa Street and Cypress Avenue a site yielded a number of fossil fish, including hatchetfish, *Argyropelecus bullockii*; bristlemouth, *Cyclothone*; herring, *Etringus*; rockfish, *Scorpaenidae*; an extinct deep-sea fish, *Chauliodus*; slickheads, *Alepocephalidae*; cod, *Eclipes*; and croaker, *Lompoquia* (McLeod, 2016). In Lincoln Heights another locality produced the holotype specimen of the fossil cetotheriid baleen whale *Mixocetus elysius* (Kellogg, 1934; McLeod, 2016).

Geological mapping by Dibblee and Ehrenspeck (1989) indicates that the surface of the project site is covered with Quaternary alluvium (Qa). These sediments date to the Holocene and, as such, are not old enough to contain fossil remains. However, these sediments progress in age with depth, such that while the surficial sediments are too young to preserve fossils, the underlying

sediments (Qoa) date back to the Pleistocene and may preserve fossil resources. This is supported by the numerous fossil discoveries in similar sediments throughout Los Angeles, as reported by the LACM records search (McLeod, 2016) and discussed above. The alluvial sediments were deposited on the ancient floodplain of the Los Angeles River and consist of well-sorted silts and sands. Given the proven fossil record of the deeper alluvial sediments, the older Quaternary alluvium has a high paleontological sensitivity. While the exact depth at which the alluvium becomes old enough to preserve fossils is unknown, the LACM records search indicated fossils have been recovered at depths of 20 feet in the area (McLeod, 2016).

Furthermore, the geotechnical analysis of the project site encountered the Miocene-age Puente Formation in the subsurface as bedrock to the northeast of the project site and is likely present in the subsurface throughout the Project site (Geotechnologies, Inc., 2016). The Puente Formation dates to the middle – upper Miocene (~5.3 – 13.8 million years ago) and consists of conglomerate, sandstone, and mudrock deposited in submarine fan at depths of 3,300-13,000 feet in the ocean (Critelli et al., 1995). The depth to the Puente Formation throughout the project site ranges considerably, and is mapped at 30 feet in depth toward the northeast end of the site. geotechnical boring results supported the geological mapping (Geotechnologies, Inc., 2016).

As a result of this study, the surficial sediments of the project site identified as younger Quaternary alluvium are too young to preserve fossils and, therefore, have low paleontological sensitivity. However, the older Quaternary alluvium and the Puente Formation are both present in the subsurface of the project site, and both have high paleontological sensitivity. Substantial excavation within the project site during construction for subterranean parking, deep excavation for excavation shoring, and ancillary uses or improvements (e.g., sewer, electrical, water) may occur at such depths as to impact formations determined as having a high sensitivity for fossils as a result of the research presented in this study.

Mitigation Measures

The following mitigation measures are required to reduce impacts to unique paleontological resources or unique geological feature to a less than significant level:

MM PAL-1: A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the project kick-off meeting and project progress meetings on a regular basis, and shall report to the site in the event potential paleontological resources are encountered.

MM PAL-2: The Qualified paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the

procedures to be followed if they are found. Documentation shall be retained demonstrating that all construction personnel attended the training.

MM PAL-3: Full-time paleontological resources monitoring shall be conducted for all ground disturbing activities occurring in older Quaternary alluvium and the Puente Formation which in this area is estimated to occur at or below approximately 15 feet in depth. The Qualified paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (or cross-trained archaeological/paleontological monitor) under the direction of the qualified paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort.

MM PAL-4: If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it should be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.

d. Disturb any human remains, including those interred outside of formal cemeteries.

Less than Significant Impact With Mitigation Incorporated. The NAHC was contacted on December 1, 2016 to request a search of their Sacred Lands File. In a letter response dated December 2, 2016, the NAHC indicated that no resources from the NAHC archives within the project site, however they did mention that the area is sensitive for cultural resources.

Archival research revealed the former location of Old Calvary Cemetery adjacent to the project area. Therefore, construction of the proposed project could potentially disturb human remains. CEQA Guidelines section 15064.5, subdivision (e), requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency shall consult with the appropriate Native Americans as identified by the Native American Heritage Commission and directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains. Implementation of Mitigation Measure CULT-6 would ensure impacts related to the discovery of human remains would be reduced to a less than significant level.

Mitigation Measure

MM CULT-6: If human remains are encountered during implementation of the project, 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 PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Cumulative Impacts

Cultural Resources

Since the proposed project would not result in any adverse historical resources impacts, it would not contribute to any cumulative impacts on historical resources.

Based on the type of historic development within the project site, the potential for subsurface archaeological resources in the project site is considered high. There is also a high potential for paleontological resources, however, since they may be encountered at depths below previous ground disturbance. Since the project includes ground-disturbing activities of up to 20 feet below ground surface and since the project would include excavation in areas that have not been subject to substantial previous disturbance (such as the paved parking lot), the project has the potential to disturb previously unknown significant archaeological resources or paleontological resources, and also has the potential for to unearth, expose, or disturb previously unknown human remains. Implementation of the above mitigation measures would ensure that potential impacts to any archaeological resources, paleontological resources, or human remains are less than significant. Implementation of the proposed project, in combination with the other 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. Each related project would be required to comply with existing regulations and

undergo CEQA review to assure that any impacts are appropriately evaluated and, if necessary, mitigated. Therefore, any cumulative impact would be less than significant. 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 discussed above. Therefore, the proposed project's incremental contribution to a cumulative impact would not be considerable.

6. Geology and Soils

Portions of the following impact analysis pertaining to geology and soils are based on information contained in the Geotechnical Hazards Report (Geotechnical Report) prepared by Geotechnologies, Inc. on August 5, 2016. The Geotechnical Report is included as Appendix C of this IS/MND.

Would the project:

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

Less Than Significant Impact. As stated in the Geotechnical Report, the project site is not located on a known active or potentially active fault and is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest such zone is the Hollywood Fault, located about 3-1/2 miles to the north. Therefore, this impact is considered less than significant.

- ii. **Strong seismic ground shaking?**

Less Than Significant Impact. As noted in Response No. 6.a.i above, the nearest active fault is the Hollywood Fault located about 3-1/2 miles north of the project site. In addition, Southern California has numerous active faults in the region and will likely experience a large regional earthquake within the operational life of the project. There is a potential for high-intensity groundshaking associated with a characteristic earthquake in this region. The intensity of such an event would depend on the causative fault and the distance to the epicenter, the moment magnitude, the duration of shaking, and the nature of the geologic materials on which the building would be constructed. Intense groundshaking and high ground accelerations would affect the entire area at and around the proposed building. The primary and secondary effects of groundshaking could damage structural foundations, distort or break utilities, and cause structural failure. The building would include residential units. Intense groundshaking could cause damage to the building and place residents at risk.

The structural elements of the proposed structure would undergo appropriate design-level geotechnical evaluations prior to final design and construction. This would include designing the

building to withstand ground motions from earthquakes. Implementing the regulatory requirements in the California Building Code (CBC), County ordinances, and City ordinances to ensure that the building would be constructed in compliance with the law is the responsibility of the project engineers and building officials. The geotechnical engineer, as a registered professional with the State of California, is required to comply with the CBC and local codes while applying standard engineering practice and the appropriate standard of care for the particular region in California, which, in the case of the proposed project, is in the City and County of Los Angeles. The California Professional Engineers Act (Building and Professions Code Sections 6700-6799), and the Codes of Professional Conduct, as administered by the California Board of Professional Engineers and Land Surveyors, provides the basis for regulating and enforcing engineering practice in California. The local building officials are typically with the local jurisdiction and are responsible for inspections and ensuring CBC and local code compliance prior to approval of the building permit. Completion of a comprehensive design-level geotechnical investigation, adherence to the current CBC and local ordinances regulating construction, and the application of proven seismic design criteria that are standard engineering practice would ensure that the structure would be designed to withstand seismic events without sustaining substantial damage or collapsing. The design and construction of the project shall conform to the CBC seismic standards as approved by the Department of Building and Safety. Therefore, the potential for fault rupture at the project site is considered to be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The potential for liquefaction is higher in areas composed of granular soils with a shallow depth to groundwater. The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to liquefaction-induced ground settlement. The placement of structures on such soils could place the public at risk of injury or structures at risk of damage. Lateral spreading, typically associated with liquefaction, is the movement of blocks of soil on liquefiable soils.

The Geotechnical Report noted that the local seismic hazard map identifies the project site as being located on potentially liquefiable soils. However, the Geotechnical Report stated that detailed liquefaction analyses performed on nearby sites investigated by Geotechnologies Inc. concluded that the soils at this project site are not anticipated to be liquefiable during a design earthquake event. In addition, the local borings did not encounter groundwater to a depth of 50 feet and the historic shallowest depth was 20 feet, depths less likely to contribute to the potential for liquefaction. Regardless, the project would still comply with Uniform Building Code Chapter 18, Division 1, Section 1804.5, Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include ground stabilization,

appropriate foundation types and depths, and appropriate structural systems. Therefore, the potential for liquefaction at the project site is considered to be less than significant.

iv. Landslides?

Less Than Significant Impact. The project site is located on flat land. The Geotechnical Report noted that no landslides are indicated on geologic maps for the project site or the immediately adjacent areas. Therefore, the potential for landslides at the project site is considered to be less than significant.

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

Less Than Significant Impact. Currently, the entire site is developed or paved and is entirely impervious. As previously noted, the building and parking area would be constructed in a flat area with little topographic relief. Project construction would involve localized short-term ground disturbance activities (e.g., grading, excavation, drilling, and the construction of the structure, foundation, and utilities). The gentle topographic relief would minimize the potential for soil erosion during construction. However, runoff from storm water and/or construction wash water could result in soil erosion and result in polluted runoff (i.e., chemicals and/or sediment) from the project site. All grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Grading and site preparation would also comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which includes requirements such as the preparation of an erosion control plan to reduce the effects of sedimentation and erosion. The completion of the proposed project would result in the introduction of with approximately 3,237 sf of pervious area in proposed landscaped open space areas.

The City of Los Angeles developed its Low Impact development (LID) ordinance, which became effective in May 2012, as a stormwater management strategy that seeks to mitigate the impacts of runoff and stormwater pollution as close to its source as possible. Urban runoff discharged from municipal storm drain systems is one of the principal causes of water quality impacts in most urban areas. It can contain pollutants such as trash and debris, bacteria and viruses, oil and grease, sediments, nutrients, metals, and toxic chemicals that can negatively affect the ocean, rivers, plant and animal life, and public health.

LID comprises a set of site design approaches and best management practices (BMPs) that are designed to address runoff and pollution at the source. These LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows. The main purpose of this law is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources. Project applicants are required to prepare and implement a stormwater mitigation plan when their projects fall into various categories, including housing developments of 10 or more dwelling units. Because the project will develop 118 housing units, the applicant would be required to incorporate stormwater mitigation measures into the design plans and submit the plans to the City for review and approval.

The BMPs that could be used to control runoff and erosion would include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of bioinfiltration swales, protection of stockpiled materials, and a variety of other measures that would substantially reduce or prevent erosion from occurring during construction. The LID ordinance also requires implementation of permanent post-construction erosion control measures to infiltrate, capture and reuse, and/or treat storm water with biofiltration or bioretention systems (e.g., swales, infiltration galleries, permeable pavements).

Also, as stated in Response No. 6.b above, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion or storm water runoff to permitted levels. Because project construction activities would be subject to the LID ordinance noted above, impacts associated with substantial increases in soil erosion or storm water runoff would be less than significant.

c. Be located on a geological 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. Unstable geologic units could result in damage to the building and place the public at risk of injury. As noted in Response No. 6.a.iv above, the Geotechnical Report concluded that the project site would not be located in an area susceptible to landslides or liquefaction. In addition, the Geotechnical Report did not identify other unstable geologic conditions. The proposed project does not include the pumping of groundwater and would therefore not contribute to potential subsidence and would not cause or contribute to a cumulative subsidence impact. Therefore, the potential for unstable geologic conditions at the project site is considered to be less than significant.

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

Less Than Significant Impact. Unless properly removed or reconditioned during construction, expansive soils could exert additional pressures on foundations and below-grade utilities, producing shrinkage cracks that allow water infiltration and compromise the integrity of backfill material. The effects of expansive soils could damage the building foundation and the paved area. Surface structures with foundations constructed in expansive soils would experience expansion and contraction depending on the season and the amount of surface water infiltration. The expansion and contraction, also referred to as linear extensibility or shrink-swell, could exert enough pressure on the structures to result in cracking, settlement, and uplift.

The Geotechnical Report noted that the project site would be constructed on fill, coarse-grained alluvium, and possibly the underlying bedrock of the Puente Formation. The Geotechnical Report assumed that the footings for the building would likely bear on the underlying Puente Formation bedrock, which would not be susceptible to expansion. In addition, clayey soils, which are not known to be present at the project site, are more susceptible to expansion. Therefore, the potential for expansive soils at the project site would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed project would be connected to the local sanitary sewer system and would not include the construction of a septic system or alternative wastewater disposal system. Therefore, there would be no impact relative to septic systems or alternative wastewater disposal systems.

Cumulative Impacts

Geology and Soils

Although the Southern California area is located within a seismically active region with a wide range of geologic and soil conditions, these conditions can vary greatly within a short distance. Accordingly, geologic, soils, and seismic impacts tend to be site-specific and depend on the local geology and soil conditions. For these reasons, the geographic scope for potential cumulative geologic and seismic impacts consists of the project location and the immediate vicinity. The timeframe during which the proposed project could contribute to cumulative geology, soils, and seismicity effects includes the construction and operations phases of the proposed project.

As described in Response No. 6.b above, construction activities have the potential to cause soil erosion and redevelopment projects have the potential for adverse long-term storm water runoff. If other cumulative projects are constructed at the same time, the erosion effects could be cumulatively significant. However, the City of Los Angeles LID ordinance would require each project to implement BMPs that would control runoff and prevent erosion for each project. Through compliance with this requirement, the potential for erosion impacts would be reduced. The LID Ordinance has been developed to address cumulative conditions arising from construction throughout the City, and is intended to maintain cumulative effects of projects subject to this requirement below levels that would be considered significant. For example, two adjacent construction sites would be required to implement BMPs to reduce and control the release of sediment and/or other pollutants in any runoff leaving their respective sites. Runoff from both sites would be required to achieve the same action levels, measured as a maximum amount of sediment or pollutant allowed per unit volume of runoff water. Thus, even if the runoff were to combine after leaving the sites, the sediments and/or pollutants in the combined runoff would still be at concentrations (amount of sediment or pollutants per volume of runoff water) below action levels and would not be cumulatively considerable (less than significant). Therefore, the impacts of the proposed project combined with local cumulative projects would not cause a significant cumulative impact related to soil erosion and the proposed action's contribution to cumulative impacts on soil erosion would not be cumulatively considerable (less than significant).

Cumulative projects that have footprints that overlap the proposed project would have the potential to have cumulative impacts that could be cumulatively significant. However, because of the localized nature of the project impacts, cumulative projects would have to be located immediately adjacent to the proposed project to be able to combine with those of the proposed

project to cause or contribute to potential cumulative geologic, soil, or seismic impacts. The proposed project is bordered on the west and south by public streets. The proposed projects parking lot would be located along the east and would remain as a buffer to the next structure to the east. Only the northern border would have an existing structure that is assumed to remain. Given the nature of the surrounding adjacent areas, the potential for overlapping potential cumulative geologic, soil, or seismic impacts would be considered to be low. In addition, as previously discussed, CBC and local building regulations and ordinances have been established to address and reduce the potential for such impacts to occur. The proposed project and any cumulative projects would be required to comply with applicable provisions of these regulations and ordinances. Through compliance with these requirements, the potential for impacts would be reduced. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction; by design, it is intended to reduce the cumulative risks from buildings and structures. Therefore, based on compliance with these requirements, the incremental impacts of the proposed project combined with impacts of other projects in the area would not cause a significant cumulative impact related to seismically induced ground shaking, liquefaction and lateral spreading, or expansive soils, and the proposed action's contribution to cumulative effects would not be cumulatively considerable (less than significant).

As previously discussed, the proposed project is on a flat parcel and the immediately surrounding area has a low susceptibility to landslides. As a result, the proposed project would not cause or contribute to any potential cumulative effect related to landslides.

The proposed project does not include the pumping of groundwater and would therefore not contribute to potential subsidence and would not cause or contribute to a cumulative subsidence impact.

The proposed project would be connected to the local sanitary sewer system and would not include the construction of a septic system or alternative wastewater disposal system. Therefore, there would be no impact relative to septic systems or alternative wastewater disposal systems and the proposed project could not cause or contribute to a cumulative alternate wastewater disposal impact.

7. Greenhouse Gas Emissions

Would the project:

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact. State regulated greenhouse gases include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). CO₂ is the most abundant greenhouse gas (GHG) in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO₂, denoted as CO₂e. Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper

global warming potential (GWP) value. These GWP ratios are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project related CO₂e emissions can be tabulated in metric tons (MT) per year.

Neither the City of Los Angeles nor the SCAQMD have adopted a numerical significance threshold for assessing impacts related to GHG emissions, and the City of Los Angeles has not formally adopted a local plan for reducing GHG emission. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice this Guideline section urges lead agencies to quantify GHG emissions of projects where possible. In addition to quantification, this section recommends consideration of qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15130(f)).⁵

When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.⁶ In its January 2008 *CEQA and Climate Change* white paper, the California Air Pollution Control Officers Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The SCAQMD released draft guidance regarding interim CEQA GHG thresholds of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. "Tier 3," the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level

⁵ See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, https://www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed December 2016.

⁶ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency’s use of existing environmental standards in determining the significance of a project’s environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”]. Lead agencies can, and often do, use regulatory agencies’ performance standards. A project’s compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

that captures 90 percent of Air Basin-wide land use GHG emissions. The SCAQMD proposed a screening level of 3,000 MT of CO₂e per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, “to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors” (SCAQMD, 2008). In CAPCOA’s January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the “objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions” (CAPCOA, 2008a). A 90 percent capture rate would “exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions” (CAPCOA, 2008b). The SCAQMD’s proposed screening level of 3,000 MTCO₂e per year is a South Coast Air Basin-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance threshold of 10,000 MTCO₂e per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this project, the significance of the project is evaluated based on the SCAQMD’s proposed screening level of 3,000 MTCO₂e, which as explained above is a South Coast Air Basin-specific level that would meet CAPCOA’s intent for the suggested quantitative threshold option.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from project-related incremental increase in the use of on-road mobile vehicles, electricity, and natural gas. This includes project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO₂e metric, the GWP ratios corresponding to the global warming potential of CO₂ over a 100-year period is used in this analysis.

The project’s increase in GHG emissions is estimated using CalEEMod, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model

is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁷

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.1) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the California Air Resources Board (CARB) and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The CalEEMod input values used in this analysis were adjusted to be project-specific based on equipment types and the construction schedule, detailed assumptions and modeling output are included in Appendix F of this IS/MND, and are further summarized above in Section 3 *Air Quality*. CalEEMod outputs construction-related GHG emissions of CO₂, CH₄, N₂O, and CO₂e. These values are reported in units of metric tons for consistency with general state, federal, and global GHG emission inventories. Emissions of GHGs from construction activities occur over a relatively short-term period of time and contribute a relatively small portion of the overall lifetime project GHG emissions. Furthermore, according to the SCAQMD, “GHG emission reduction measures for construction equipment are relatively limited” (SCAQMD, 2008). Therefore, SCAQMD staff recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.

Operational emissions were estimated using CalEEMod for the project in order to determine the incremental increase in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by the project trips, trip generation rates provided in the project traffic study were used (Gibson Transportation Consulting, Inc., 2016). The trips take into account trip reductions from nearby access to public transportation. The project site is located in proximity to Metro Rail Stations and Metro bus routes. Additional reductions in VMT are calculated based on site-specific characteristics, such as increased job and housing density on the site and proximity to regional job centers, using the equations and methods prescribed in the California Air Pollution Control Officers Association guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures (CAPCOA, 2010). Detailed Assumptions and modeling output are included in Appendix F of this IS/MND.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the project land uses, as well as estimated water supply needs. Energy usage (off-site electricity generation and on-site natural gas consumption) for the project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand

⁷ See <http://www.caleemod.com>.

by building type (CEC, 2016). Since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the 2013 Title 24 Building Standards Code. The energy use from residential land uses is calculated based on the CEC Residential Appliance Saturation Survey (RASS), which also incorporates correction factors to account for compliance with the 2013 Title 24 Building Standards Code. Because the project would be required to comply with the 2016 Title 24 Building Standards Code, the energy usage for the project is adjusted to take into account the additional reductions that would occur due to compliance with the more stringent 2016 Title 24 Building Standards. The project's residential uses would not include wood-burning fireplaces in accordance with SCAQMD regulations.

Water and wastewater generated from the project requires energy to supply, distribute and treat. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California* (CEC, 2006). These electrical intensity factors have been updated to represent LADWP's expected use of renewable sources at the time the project is built out (2021). The emissions of GHGs associated with the wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A* (CAPCOA, 2013). Water consumption for the project applied consistent to the assumptions in the Utilities Section of the IS/MND.

Emissions from solid waste handling generated from the project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH₄, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the existing site uses and project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)* (CARB, 2003). The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin.

Emissions calculations for the project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy demand from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements.

The emissions of GHGs associated with construction of the project were calculated for each year of construction activity. Results of the GHG emissions calculations are presented on **Table B-5, Estimated Unmitigated Construction Greenhouse Gas Emissions**. The maximum annualized GHG emissions for the project (including project construction amortized over 30 years) are shown in **Table B-6 Estimated Project Annual Greenhouse Gas Emissions**. Detailed GHG emissions estimates for the existing site and project are provided in Appendix F. As shown in Table B-6, the incremental increase in project GHG emissions would not exceed the threshold of significance. As a result, the project would have a less than significant impact with respect to construction and operational GHG emissions.

**TABLE B-5
ESTIMATED UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS**

Emissions Source	CO₂e (metric tons) ^a
Construction Year 2019	839
Construction Year 2020	540
Construction Year 2021 (1 st quarter)	21
Total	1,400
Annual (Amortized over 30 years)	47

^a Totals may not add up exactly due to rounding in the modeling calculations. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table.

SOURCE: ESA PCR, 2017.

**TABLE B-6
ESTIMATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS**

Emissions Source	Project CO₂e (metric tons) ^a
Construction (Amortized)	47
On-Road Mobile	1,011
Area	29
Energy	466
Water and Wastewater	31
Solid Waste	55
Total	1,639
Significance Threshold	3,000
Exceeds Threshold?	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Emissions calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project emissions would be similar to or slightly less than shown in this table. The less-than-significant GHG emissions impacts would be the same as shown in this table.

SOURCE: ESA PCR, 2017.

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

Consistency with Regional and Local Trip and VMT Reduction Goals, Actions, and Recommendations

Less Than Significant Impact. The significance of the project's GHG emissions was first evaluated based on whether the emissions would be generated in connection with development located and designed consistent with relevant regional and local goals, actions, and recommendations designed to encourage development to reduce trips and VMTs. Transportation-related GHG emissions are the largest sector of emissions from the project. This project characteristic is consistent with the assumption in many regional plans, such as the SCAG RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. The purpose of the SCAG RTP/SCS is to achieve its assigned regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Draft Program EIR for the RTP/SCS, released in December 2015, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375" (SCAG, 2015). SCAG's RTP/SCS plans for regional population growth using smart land use strategies. As part of the SCS/RTP, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand" (SCAG, 2015). Moreover, the RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the RTP/SCS would "supports sustainable growth through a more compact, infill, and walkable development pattern" (SCAG, 2015).

Consistent with SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the project would accommodate projected increases in population, households, employment, and travel demand by implementing smart land use strategies. As discussed previously, the project Site is an infill location close to jobs, housing, shopping and entertainment uses and in proximity to existing and future public transit stops, which would result in reduced VMT, as compared to a project of similar size and with similar land uses at a location without close and walkable access to off-site destinations and public transit stops. Based on the CAPCOA reductions discussed in (a) above and detailed in Appendix F of this IS/MND, the project would achieve an approximately 21 percent reduction in VMT and therefore transportation-related emissions due to the location and nature of the project.

The estimated reduction in VMT for the project is supported by area-specific data in the *Health Atlas for the City of Los Angeles* (Health Atlas), published by the City in June 2013 (City of Los Angeles, 2013). The Health Atlas is not a plan specifically developed to reduce GHG emissions. Nonetheless, while the primary focus of the Health Atlas is on factors that affect the health behaviors and health status of residents and workers in the City, much of the data is relevant to land use GHG emissions as those emissions reflect similar issues regarding land use patterns,

urban design, and transportation systems. As detailed below, data collected by the City in support of its *Health Atlas for the City of Los Angeles* demonstrates that the project would be located in an area that would result in substantially reduced mobile source GHG emissions relative to the Citywide and statewide average and that the project would be consistent with regional planning efforts, in accordance with the SCAG RTP/SCS, to reduce VMT and associated emissions. The Health Atlas includes a number of findings related to land use mix and diversity, employment density, walkability, access to public transit, and other land use transportation findings organized by Community Plan Area. The project is located in the Central City North Community Plan Area. A summary and analysis of the Health Atlas findings relative to the Central City North Community Plan Area are provided below:

- **Increased Land Use Diversity and Mixed-Uses:** According to the Health Atlas, a “mix of land uses can increase walking and other physical activity” and “offer more destinations for non-automobile trips” (City of Los Angeles, 2013). The Health Atlas evaluates land use diversity based on the presence of 19 types of uses or amenities, including supermarkets, convenience stores, banks, gyms, department stores, farmer’s markets, libraries, and parks, grouped into four categories: food retail, community-serving retail, services, civic and community facility. The Central City North Community Plan Area scored in the mid-range out of the 35 Community Plan Areas, indicating that the area has a typical number of different types of amenities available in the Community Plan Area (a score of 9, which is in the approximate middle of the scores) (City of Los Angeles, 2013). As such, the data indicates that the Central City North Community Plan Area has a potential for walkability and offers a range of destinations available for non-motorized trips. As noted above, these findings are consistent with the conclusion in the CAPCOA guidance, *Quantifying Greenhouse Gas Mitigation Measures*. CAPCOA measure LUT-3 (Increase Diversity of Urban and Suburban Developments [Mixed Use]) states that “different types of land uses near one another can decrease VMT since trips between land use types are shorter and may be accommodated by non-auto modes of transport” (CAPCOA, 2010). The Health Atlas findings are also related to the goals of the SCAG RTP/SCS, which seeks improved “mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them” (SCAG, 2012). According to SCAG, incorporating “smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand” and associated pollutants (SCAG, 2012). The scores for the number of destinations available for non-motorized trips within the Central City North Community Plan Area support the expectation that projects located in the area would achieve measureable reductions in VMT and associated mobile source emissions. It also follows that projects located in the area would be expected to achieve reductions in VMT and associated mobile source emissions relative to the statewide average since the City of Los Angeles is more urbanized and has a higher diversity of land uses than the state as a whole. Therefore, based on City data and expert guidance from state and regional agencies, the project has been properly designed and located in an area that would enable its development to achieve a measureable reduction in emissions from mobile sources and to have a substantially greater level of transportation efficiency when compared to the statewide average. Furthermore, the land use diversity scores for the Central City North Community Plan Area in the Health Atlas show that the project would be located in an area generally consistent with the regional

SCAG RTP/SCS goals to improve mobility and access to diverse destinations, and to reduce vehicular demand and associated emissions.

- **Employment Density:** The Health Atlas recognizes that “[h]igher levels of employment density, particularly retail job densities, are associated with more walking trips” as they “allow for more frequent and comprehensive transit service” (City of Los Angeles, 2013). In turn, “[d]enser employment districts which are rich in transit service typically result in more walking and transit use ... and makes jobs more accessible to all residents” (SCAG, 2013). The Health Atlas evaluates employment density as the number of jobs per square mile. The Central City North Community Plan Area has the fifth highest employment density of the 35 Community Plan Areas in the City with about 9,050 jobs per square mile (SCAG, 2013). The Citywide average employee density is approximately 1,185 jobs per square mile (SCAG, 2013). The data indicate that the Central City North Community Plan Area has a high potential for walkability and making use of frequent and comprehensive transit services, such as the Metro Gold Line and connecting bus lines. These findings are consistent with CAPCOA’s conclusions with respect to the CAPCOA guidance measure LUT-1 (Increase Density), which states that “[i]ncreased densities affect the distance people travel and provide greater options for the mode of travel they choose” (CAPCOA, 2010). Measure LUT-1 also states that increased densities “provides a foundation for implementation of many other strategies which would benefit from increased densities” such as “enhanced transit service” (CAPCOA, 2010). The Health Atlas findings are also related to the goals of the SCAG RTP/SCS, which seeks improved mobility and access and implementation of smart land use strategies that encourage walking, biking, and transit use, resulting in reduced vehicular demand and associated pollutants. The high employment density of the Central City North Community Plan Area supports the expectation that projects located in the area would have high levels of walkability and high potential for transit usage. As this information demonstrates, the project has been proposed in an area where its development can achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average. Therefore, based on City data and expert guidance from state and regional agencies, the project has been properly designed and located in an employment dense area such that it would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average. Furthermore, the land employment density score for the Central City North Community Plan Area in the Health Atlas shows that the project has been proposed in an area consistent with the regional SCAG RTP/SCS goals to improve mobility and access to diverse destinations, and to reduce vehicular demand and associated emissions.
- **Walkability:** The land use mix and diversity and employment density findings indicate that the Central City North Community Plan Area has a positive potential for walkability. The Health Atlas also provides a direct quantitative analysis of the walkability of each Community Plan Area using a Walkability Index based on four components: land use mix, residential density, retail density, and intersection density. Higher scores represent more walkable areas. The Central City North Community Plan Area has a positive value for the Walkability Index (City of Los Angeles, 2013). These findings are consistent with CAPCOA’s conclusions in the CAPCOA guidance measure LUT-9 (Improve Design of

Development), which indicates that design elements that enhance walkability and connectivity, such as intersection density, reduce VMT and associated GHG emissions. The Health Atlas findings are also consistent with the goals of the SCAG RTP/SCS, which seeks better “placemaking,” defined as “the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking environment that reduces [people’s] reliance on their car” (SCAG, 2012). The Walkability Index of the area within the Central City North Community Plan Area, in which the project site is located, supports the expectation that projects located in the area would have a highly walkable environment. As this information demonstrates, the project has been proposed in an area where its development can achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average. Therefore, based on City data and expert guidance from state and regional agencies, the project has been properly designed and located in a walkable area such that it would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average. Furthermore, the land employment density score for the Central City North Community Plan Area in the Health Atlas show that the project would be properly located in an area consistent with the regional SCAG RTP/SCS goals to provide better “placemaking” and to reduce vehicular demand and associated emissions.

- **Workers Commuting by Walking, Biking, and Public Transportation:** The Health Atlas also indicates that the Central City North Community Plan Area has a high percentage of workers that commute to work by walking, biking, and public transportation. The Central City North Community Plan Area has the 6th highest percentage of workers that commute to work by walking, biking, and public transportation, at about 24 percent for the area as a whole, based on 2010 data (greater than the 7th highest Southeast Los Angeles Community Plan Area but less than the 5th highest South Los Angeles Community Plan Area) (City of Los Angeles, 2013). The statewide percentage of workers that commute to work by walking, biking, and public transportation is approximately 9 percent, based on census data for the 2010 to 2014 period (U.S. Census Bureau, 2015). As discussed previously, the project area within the Central City North Community Plan Area is a highly walkable area and the area is also well served by frequent and comprehensive transit including the nearby Metro Gold, Red, and Purple Lines, which provides convenient access to locations within Downtown Los Angeles and a multitude of locations outside the Downtown area, and multiple bus lines. Thus, the data indicates that the Central City North Community Plan Area substantially exceeds the statewide average for the percentage of workers that commute to work by walking, biking, and public transportation. The Health Atlas findings are consistent with CAPCOA’s conclusions in the CAPCOA guidance measures LUT-1, LUT-3, and LUT-9, as discussed previously, and also in LUT-5 (Increase Transit Accessibility), which indicates that “high density near transit will facilitate the use of transit by people” (CAPCOA, 2010). The Health Atlas findings are also consistent with the goals of the SCAG RTP/SCS, which seeks “[s]trategies focused on high-quality places, compact infill development, and more housing and transportation choices” (SCAG, 2012). The high proportion of workers that commute to work by walking, biking, and public transportation in the Central City North Community Plan Area supports a reasonable expectation that projects located in the area would be accessible

to and would utilize alternative forms of transportation. As this information demonstrates, the project has been proposed in an area where its development can achieve substantial reductions in VMT and associated mobile source emissions relative to the Citywide and statewide average. Therefore, based on City data and expert guidance from state and regional agencies, the project has been properly designed and located in an area accessible to alternative forms of transportation including walking, bicycling, and transit and would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average. Furthermore, the project would be properly located in an area consistent with the regional SCAG RTP/SCS goals to provide more transportation choices and to reduce vehicular demand and associated emissions.

The above data from the City's Health Atlas not only provides additional support for the VMT reduction findings in this analysis, but also demonstrates that the project's design and location are consistent with local and regional goals to reduce GHG emissions from transportation. The project's specific location in proximity to high-quality transit, including the Metro Gold, Red, and Purple Lines and multiple bus routes, its mix of uses, proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and highly walkable environment support the finding in this analysis that the project has been properly located so that its development would achieve a reduction in VMT better than the City and statewide average.

Consistency with Plans, Policies, Regulations or Recommendations

Less Than Significant Impact. Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the project's less-than-significant annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago. The GHG emissions of the project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective" (CAPCOA, 2008c). It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. Because of the less than significant annual GHG emissions estimated for this project, the lack of evidence indicating that those emissions would cause a measurable change in global GHG emissions necessary to exacerbate global climate change, and the fact that the project incorporates physical and operational project characteristics and Project Design Features that would ensure consistency of project design and location with City goals and actions, rendering them less than significant, the project is considered to be consistent with the GHG reduction goals of California Health and Safety Code (HSC) Division 25.5 (the California Global Warming Solutions Act of 2006, also referred to as Assembly Bill [AB] 32) and associated GHG reduction plans such as SCAG's RTP/SCS, and it is not expected that project development would impede their goals. In fact, as discussed above, the project's location and development would be consistent with the City's goals and actions and SCAG's RTP/SCS recommendations for reducing GHG emissions.

As discussed above, the project's estimated VMT reductions would be consistent with regional plans to reduce transportation-related GHG emissions as part of the overall statewide strategy under HSC Division 25.5. The project would incorporate characteristics that would reduce transportation-related GHG emissions by locating project uses adjacent to several bus routes including Route 28, 45, 83, 84/68, and the DASH Lincoln Heights/Chinatown and within approximately one-half mile of the high-quality Metro Gold Line Chinatown Station that provides service to Azusa, Pasadena, Little Tokyo and East Los Angeles, and connects directly to Union Station with Amtrak and Metrolink rail lines and the Metro Red, Purple, and Gold Lines, thereby encouraging alternative forms of transportation and pedestrian activity. The project would be consistent with and support the goals of the SCAG RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them" (SCAG, 2012). According to SCAG, incorporating "smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand" and associated pollutants (SCAG, 2012). Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking environment that reduces their reliance on their car" (SCAG, 2012). The high scores for walkability and number of destinations available for non-motorized trips for the project area within the Central City North Community Plan Area (as demonstrated by data from the City's Health Atlas) shows that the existing infrastructure and built environment is sufficiently developed that projects located in the area would be expected to achieve substantial and credible reductions in trip distances and overall VMT. The high employment density of the Central City North Community Plan Area supports the expectation that projects located in the area would provide high levels of walkability and high potential for transit usage by project residents, employees, and visitors. The high number of workers that commute to work by walking, biking, and public transportation in the Central City North Community Plan Area is additional proof that projects located in the area would provide access to more transportation choices for project residents, employees, and visitors and that projects would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average. The project would therefore be consistent with the SCAG RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. As such, the project would be consistent with regional plans to reduce VMT and associated GHG emissions.

As discussed previously, the project's design would comply with the Los Angeles Green Building Code to reduce GHG emissions by implementing energy-efficient building designs, installing energy-efficient appliances and equipment, and installing indoor and outdoor water-efficient appliances and fixtures. These measures are consistent with the City's GHG reduction, sustainability, and smart-growth goals of improving energy and water efficiency in buildings, decreasing per-capita water use, using energy efficient appliances and equipment, and creating a more livable city.

When implemented, the following planned City actions, as presented in the LA Green Plan, may further decrease emissions of GHGs from the project. These actions are not under the control of the project; however, they would nonetheless further reduce project-related GHG emissions:

- Decreasing emissions from Department of Water and Power electrical generation and import activities;
- Promoting walking and biking to work, within neighborhoods, and to large events and venues via pedestrian-friendly land use policies; and
- Expanding the regional rail network to reduce VMT.

Table B-7, *Consistency with Applicable Greenhouse Gas Reduction Strategies*, contains a list of GHG emission reduction strategies and addresses the project's consistency. The analysis describes the consistency of the project with these strategies. Furthermore, in addition to the project's consistency with currently applicable GHG emission reduction strategies, the project would not conflict with or impede the future statewide GHG emission reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high speed rail and other alternative transportation options, and use of high efficiency appliances, water heaters, and HVAC systems (Energy + Environmental Economics, 2015). The project would benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The project would also benefit from statewide efforts toward increasing the fuel economy standards of vehicles. The project would support alternative transportation and reducing VMT growth by its location at an infill location close to existing transit (including the Metro Gold Line at the Chinatown Station, as well as Union Station with Amtrak and Metrolink rail lines and the Metro Red, Purple, and Gold Lines). The project would utilize energy efficient appliances and equipment and would reduce its building energy consumption via compliance with City standards and the CALGreen Code.

Because the project's location, land use characteristics and design render it consistent statewide and regional climate change mandates, plans, policies, and recommendations, and with the City's Green Building Code and the LA Green Plan, the project would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions and its impacts would be less than significant.

TABLE B-7
CONSISTENCY WITH APPLICABLE GREENHOUSE GAS REDUCTION STRATEGIES

Source	Category / Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces greenhouse gas emissions in new passenger vehicles from model year 2012 through 2016 (Phase I) and model year 2017-2025 (Phase II). Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	Consistent. The project would not conflict with this regulation and would not conflict with implementation of the vehicle emissions standards. Although the project has no control over vehicle emissions, project design includes substantial bicycle parking, accommodations for plug-in vehicles and pedestrian features, and the project is located in a transit-rich area near employment centers and shopping areas.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	Consistent. The project would not conflict with this regulation and would not conflict with implementation of the emissions standards for power plants. Although the project has no control over power plant emissions, the project design incorporates many energy-saving measures.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Consistent. The project would be consistent with this regulation and would not conflict with implementation of the transportation fuel standards. See AB 1493, above.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	Consistent. The project would utilize energy efficiency appliances and equipment and would meet the energy standards in the 2016 Title 24 Building Energy Efficiency Standards.
	HVAC Systems will be designed to meet ASHRAE standards.	Consistent. The project would utilize energy efficiency appliances and equipment and would meet the energy standards in the 2016 Title 24 Building Energy Efficiency Standards.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Air filtration systems are required to meet a minimum of MERV 8 or higher.	Consistent. The project would meet or exceed this requirement as part of its compliance with the City's requirements, and the CALGreen Code.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	Consistent. The project would exceed this requirement as part of the incorporated physical and operational project characteristics to reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees. The project would provide parking for approximately 156 bicycles on-site.
	Stormwater Pollution Prevention Plan (SWPPP) required.	Consistent. The project would meet this requirement via compliance with Statewide General Construction Activity Stormwater Permit (GCASP) requirements and implementation of required erosion and sediment control and pollution prevention best management practices (BMPs).

Source	Category / Description	Consistency Analysis
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	Consistent. The project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	Consistent. The project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires use of low VOC coatings consistent with AQMD Rule 1168.	Consistent. The project would be consistent with this regulation and would meet or exceed the low VOC coating requirements.
	100 percent of vegetation, rocks, soils from land clearing shall be recycled or stockpiled on-site.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	Consistent. The project would be consistent with the CARB Air Toxics Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling to no more than 5 minutes at any given time. In addition, the project would ban delivery truck idling.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Consistent. The project would provide appropriate landscaping on the project site.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. The project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. The project would utilize energy efficiency appliances and equipment and would meet the energy standards in the 2016 Title 24 Building Energy Efficiency Standards.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	Consistent. The project would incorporate physical and operational project features that would reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.

Source	Category / Description	Consistency Analysis
	Reduce energy use in private buildings.	Consistent. The project would utilize energy-efficient appliances and equipment and would meet the energy standards in the 2016 Title 24 Building Energy Efficiency Standards.

SOURCE: ESA PCR, 2017.

Consistency with Executive Orders S-3-05 and B-30-15

Less Than Significant Impact. At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State’s Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05’s goal to reduce GHG emissions to 1990 levels by 2020 was established by the Legislature as the 2006 Global Warming Solutions Act (i.e., AB 32) and codified into law in HSC Division 25.5. As analyzed above, the project would be consistent with AB 32. Therefore, the project would be consistent with this component of the Executive Orders.

The Executive Orders also establish the goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2030 goal was codified into law by the Legislature under SB 32 and AB 197. The 2050 goal has not yet been codified into law. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors that have not yet been achieved on a broad scale, or at all, including electrification and the decarbonization of fuel, will be required. In its *Climate Change Scoping Plan*, CARB acknowledged that the “measures needed to meet the 2050 goal are too far in the future to define in detail” (CARB, 2008). In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately” (CARB, 2014). Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the project’s impacts further relative to the 2050 goals currently is speculative for purposes of CEQA. Moreover, CARB has not calculated and released the BAU emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA project’s consistency with these targets.

Although the project’s emissions levels in 2050 cannot yet be reliably quantified, statewide efforts are underway to facilitate the State’s achievement of those goals and it is reasonable to expect the project’s emissions level to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the project’s emissions total at build-out represents the maximum emissions inventory for the project as California’s emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State’s environmental policy objectives. As such, given the reasonably anticipated decline in project emissions once fully constructed and operational, the project would be consistent with the Executive Orders’ goals.

The Climate Change Scoping Plan recognizes that HSC Division 25.5 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: “These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate” (CARB, 2008). Also, CARB’s First Update provides that it “lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050,” and many of the emission reduction strategies recommended by CARB would serve to reduce the project’s post-2020 emissions level to the extent applicable by law (CARB, 2014):

Energy Sector: Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce the project’s emissions level. Additionally, further additions to California’s renewable resource portfolio would favorably influence the project’s emissions level.

Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the project’s emissions level.

Water Sector: The project’s emissions level will be reduced as a result of further enhancements to water conservation technologies.

Waste Management Sector: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the project’s emissions level.

While the 2020 cap would remain in effect post-2020,⁸ the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions. However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The “recommended action” in the First Update to the Climate Change Scoping Plan for the Cap-and-Trade Program is: “Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target” (CARB, 2014). The “expected completion date” for this recommended action is 2017 (CARB, 2014).

In addition to CARB’s First Update, in January 2015, during his inaugural address, Governor Jerry Brown expressed a commitment to achieve “three ambitious goals” that he would like to see accomplished by 2030 to reduce the State’s GHG emissions: (1) increasing the State’s Renewables Portfolio Standard from 33 percent in 2020 to 50 percent in 2030; (2) cutting the petroleum use in cars and trucks in half; and (3) doubling the efficiency of existing buildings and making heating fuels cleaner (Los Angeles Times, 2015). These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action through the state agencies

⁸ California Health & Safety Code § 38551(a) (“The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.”).

and departments responsible for achieving the State’s environmental policy objectives, particularly those relating to global climate change. As discussed previously, the Governor has already signed into law SB 350 (Chapter 547, Statutes of 2015), which increased the Renewables Portfolio Standard to 50 percent by 2030 and included interim targets of 40 percent by 2024 and 45 percent by 2027.

Further, recent studies shows that the State’s existing and proposed regulatory framework can allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.⁹

For the reasons described above, the project’s post-2020 emissions trajectory is expected to follow a declining trend, consistent with the establishment of the 2030 and 2050 targets. Therefore, as the project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions, impacts regarding greenhouse gas reduction plans would be less than significant

Cumulative Impacts

Greenhouse Gas Emissions

Worldwide man-made emissions of GHGs were approximately 49,000 MMTCO₂e annually including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation) (IPCC, 2014). Emissions of CO₂ from fossil fuel use and industrial processes account for 65 percent of the total while CO₂ emissions from all sources accounts for 76 percent of the total. Methane emissions account for 16 percent and N₂O emissions for 6.2 percent. In 2013, the United States was the world’s second largest emitter of carbon dioxide at 5,300 MMT (China was the largest emitter of carbon dioxide at 10,300 MMT) (PBL Netherlands Environmental Assessment Agency and the European Commission Joint Research Center, 2014).

CEQA requires that lead agencies consider the cumulative impacts of GHG emissions from even relatively small (on a global basis) increases in GHG emissions. Small contributions to this cumulative impact (from which significant effects are occurring and are expected to worsen over time) may be potentially considerable and therefore significant. A cumulatively considerable impact would occur where the impact of the project in addition to the Related Projects would be

⁹ Energy and Environmental Economics (E3), “Summary of the California State Agencies’ PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios” (April 2015); Greenblatt, Jeffrey, Energy Policy, “Modeling California Impacts on Greenhouse Gas Emissions” (Vol. 78, pp. 158-172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state’s goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

significant. However, in the case of global climate change, the proximity of the project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. Moreover, although the State requires Metropolitan Planning Organizations and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently no established non-speculative method to assess the cumulative impact of proposed independent private-party development projects.

Although HSC Division 25.5 sets a statewide target for 2020 GHG emissions, the implementing tools of the law (e.g., CARB's *Climate Change Scoping Plan*) make clear that the reductions are not expected to occur uniformly from all sources or sectors. CARB has set targets specific to the transportation sector (land use-related transportation emissions), for example, and under SB 375 SCAG must incorporate these GHG-reduction goals into the Regional Transportation Plan and demonstrate that its Sustainable Communities Strategy or Alternative Planning Strategy is consistent with the Regional Housing Needs Assessment. One of the goals of this process is to ensure that the efforts of State, regional and local planning agencies accommodate the contemporaneous increase in population and employment with a decrease in overall GHG emissions. For example, adopting zoning designations that reduce density in areas which are expected to experience growth in population and housing needs, is seen as inconsistent with anti-sprawl goals of sustainable planning. Although development under a reduced density scenario would result in lower GHG emissions from the use of that land compared to what is currently or hypothetically allowed (by creating fewer units and fewer attributable vehicle trips), total regional GHG emissions would likely fail to decrease at the desired rate or, worse, would increase if regional housing and employment needs of an area were then met with a larger number of less-intensive development projects. Therefore, it is not simply a cumulative increase in regional development or the resultant GHG emissions that threatens GHG reduction goals.

As discussed above, the City has adopted a Green Building Code that includes mandatory measures. However, the Green Building Code also includes voluntary options applicable to and chosen by each individual project developer, and their efficacy in reducing GHG emissions can vary tremendously based on individual project locations and designs. In addition, the emissions models used for project-level evaluations may not fully reflect improvements in technology and other reductions in GHG emissions that are likely to occur in the future pursuant to State regulations, such as future model year vehicle emission standards after 2020, as well as other future federal and/or State regulations. For these reasons, it is not possible or meaningful to calculate emissions from each of the identified Related Projects and compare that with a numeric threshold or reduction target.

As discussed in Table B-7, the project would be consistent with applicable GHG reduction strategies. In addition, the project would support and be consistent with relevant and applicable GHG emission reduction strategies in SCAG's Sustainable Communities Strategy. These strategies include providing residences, including retail uses in an urban infill location and within a relatively short distance of existing transit stops; providing employment near current transit stops and neighborhood commercial centers; and supporting alternative and electric vehicles via the installation of on-site electric vehicle charging stations. As a result, the project would be

consistent with the State's goals. Furthermore, the overwhelming majority of the project-related GHG emissions are from source sectors that include electricity generated in-state or imported and the combustion of transportation fuels. These sectors are already covered entities under the Cap-and-Trade Program and as such would be reduced sector-wide in accordance with the goals of HSC Division 25.5, in addition to the previously discussed GHG emissions reductions from the project-specific energy efficiency design features, and VMT-reducing characteristics. Given that the project would generate GHG emissions consistent with applicable reduction plans and policies that therefore are less than significant, and given that GHG emission impacts are cumulative in nature, the project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

8. Hazards and Hazardous Materials

Portions of the following impact analysis pertaining to hazards and hazardous materials are based on information contained in the Phase I Environmental Site Assessment (Phase I ESA) prepared by Ninyo & Moore Geotechnical and Environmental Sciences Consultants on June 4, 2003. The Phase I ESA is included as Appendix G of this IS/MND.

Would the project:

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

Less than Significant Impact. Petroleum products, such as gasoline, diesel fuel, lubricants, and cleaning solvents would be utilized to fuel and maintain construction vehicles and equipment for the proposed project. The construction materials would include paints, thinners, glues and adhesives, solvents, and other construction materials that can be considered hazardous materials. The routine transport, use, or disposal of these materials could result in inadvertent releases of small quantities of hazardous materials, which could adversely affect construction workers and the environment.

Construction activities are required to comply with numerous hazardous materials and stormwater regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials to affect stormwater and downstream receiving water bodies. Contractors working on the proposed project would be required to prepare and implement a Hazardous Materials Business Plan (HMBP) that would require that hazardous materials used for construction are stored in appropriate containers, with secondary containment to contain a potential release. Cal/OSHA regulations provide for the proper labeling, storage, and handling of hazardous materials to reduce the potential harmful health effects that could result from worker exposure to hazardous materials. The California Fire Code would require measures for the safe storage and handling of hazardous materials. As discussed above in Section 6, Geology, Seismicity, and Soils, the construction contractor(s) would be required to comply with the City's LID Ordinance to reduce pollution from stormwater runoff. Through compliance with

applicable hazardous materials storage, disposal, and stormwater permitting regulations, hazardous materials impacts associated with potential releases from the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

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?

Less than Significant Impact with Mitigation Incorporated. The potential impacts related to the use of hazardous materials in the construction of the project are analyzed in Response No. 8.a above. This Response No. 8.b below analyzes hazardous materials associated with the demolition of the existing structure and hazards associated with being located at this particular location.

Asbestos-Containing Materials

Less Than Significant Impact. As stated in the Phase I ESA, the existing structure has been onsite since at least 1938. This date precedes the regulations promulgated in the 1970's that banned the use of asbestos-containing materials (ACM) in construction materials. The removal of ACM during the demolition of the existing structure could result in the exposure of demolition crews to ACM. ACMs are considered both a hazardous air pollutant and a human health hazard. The risk to human health is from inhalation of airborne asbestos, which can occur when ACMs are disturbed during demolition and renovation activities.

The building use changed from an auto dealership with repair and maintenance services to architectural offices in 2004. All of the auto service equipment, chemicals, and materials were removed. The interior of the building remodeled to the current architectural offices. Records regarding ACM surveys and removal, of any, have not been located and it is therefore assumed that ACMs may still be present in the existing building.

Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The South Coast Air Quality Management District is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and must be notified ten days in advance of any proposed demolition or abatement work. The local office of Cal/OSHA must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.17 where there is asbestos-related work involving 100 sf or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the local building department would not issue the required permit until the applicant has complied with the notice and abatement requirements described above.

Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACM are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. Through compliance with applicable ACM regulations, impacts associated with the removal of ACM, if present, would be less than significant.

Lead-Based Paint

Less Than Significant Impact. As stated in the Phase I ESA, the existing structure has been onsite since at least 1938. This date precedes the regulations promulgated in the 1970's that banned the use of lead-based paint (LBP). The removal of materials coated with LBP during the demolition of the existing structure could result in the exposure of demolition crews to LBP. LBP is considered both a hazardous air pollutant and a human health hazard. The risk to human health is from inhalation of airborne LBP, which can occur when LBP is disturbed during demolition and renovation activities.

The building use changed from an auto dealership with repair and maintenance services to architectural offices in 2004. All of the auto service equipment, chemicals, and materials were removed. The interior of the building was remodeled to the current architectural offices. Records regarding LBP surveys and removal, of any, have not been located, and therefore it is assumed that materials coated with LBP may still be present in the existing building.

Lead and lead compounds can be found in many types of paint. In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. Prior to 1978, the lead content was higher. Lead dust is of special concern, because the smaller particles are more easily absorbed by the body. Common methods of paint removal, such as sanding, scraping, and burning, create excessive amounts of dust. Lead based paints are considered likely present in buildings constructed prior to 1960, and potentially present in buildings built prior to 1978. Since the structure located onsite were built prior to the federal regulations banning the use of LBP, LBP is likely to be present if it was not removed during the removal of the auto dealership and service.

The demolition of the existing building would be subject to the Cal/OSHA Lead in Construction Standard (8 CCR Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 sf of materials containing lead would be disturbed.

Regulations to manage and control exposure to LBP are described in CFR Title 29, Section 1926.62 and CCR Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the

safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA requires 24-hour notification if more than 100 sf of LBP would be disturbed.

Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the LADBS. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Through compliance with applicable LBP regulations, impacts associated with the removal of LBP, if present, would be less than significant.

Polychlorinated Biphenyls

Less Than Significant Impact. Polychlorinated Biphenyls (PCBs) are organic oils that were formerly placed in many types of electrical equipment, such as transformers and capacitors, primarily as electrical insulators. They may also be found in hydraulic fluid used for hoists, elevators, etc. Years after widespread and commonplace installation, it was discovered that exposure to PCBs may cause various health effects and that PCBs are highly persistent in the environment. The EPA has listed these substances as carcinogens. PCBs were banned from use in electrical capacitors, electrical transformers, vacuum pumps, and gas turbines in 1979 and began a program to phase out certain existing PCB-containing equipment. The use and management of PCBs in electrical equipment is regulated pursuant to the Toxic Substances Control Act, 15 USC § 2601 et seq. The Toxic Substances Control Act and its implementing regulations generally require labeling and periodic inspection of certain types of PCB equipment and set forth detailed safeguards to be followed for disposal of such items. As stated in the Phase I ESA, several pole-mounted transformers were noted along Broadway and Savoy Street, but no staining was observed in the vicinity of the transformers or on the ground beneath the transformers.

Prior to issuance of a demolition permit, a PCB abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal. Impacts associated with the PCBs would be less than significant.

Methane

Less Than Significant Impact. Because of the presence of naturally occurring oil and natural gas in various areas throughout southern California, the City of Los Angeles established Ordinance Code 175790 to establish city-wide methane mitigation requirements. Methane is a flammable and explosive gas. As a part of this program, the City developed a map showing zones within the city limits that have the potential for methane issues.

As stated in the Geotechnical Report, the proposed project site is within a methane zone. The Geotechnical Report included a map showing the proposed project site within the methane zone and indicating active or abandoned oil and/or natural gas wells located about 600 feet to the

southwest. The report recommended that site testing to determine the Design Methane Concentration and Design Methane Pressure be completed and an appropriate methane mitigation system be prepared by a qualified methane consultant in compliance with applicable requirements in the City's Methane Code, LAMC Ordinance 175790, and by consulting the LADBS website regarding Methane Mitigation Standards (<http://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigation-standards>).

As the project site is within a methane zone, prior to the issuance of a building permit, the 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. With compliance with the required regulations governing methane, impacts associated with methane would be considered less than significant.

Radon Gas

Less Than Significant Impact. Radon is a naturally occurring cancer-causing, radioactive gas. Radon comes from the natural (radioactive) breakdown of uranium in soil, rock and water and can accumulate in air within in lower levels of structures in enclosed spaces with access to soil. The California Geological Survey (CGS) has prepared a map of areas within Los Angeles County where geologic conditions are more likely to contribute to excessive indoor radon levels (CGS, 2005). The proposed project site is not located within one of those areas. Therefore, impacts associated with radon would be considered to be less than significant.

Recognized Environmental Conditions and Vapor Encroachment Conditions (VEC)

Less Than Significant Impact with Mitigation Incorporated. A Phase I Environmental Site Assessment, typically conducted in general accordance with the requirements of ASTM 1527, is designed to identify what are referred to as Recognized Environmental Conditions (RECs). The Phase I ESA was conducted for this property in 2003 when it was still an auto dealership with maintenance and repair services. The Phase I ESA identified a number of RECs, all associated with the maintenance and repair operations. It is unknown whether the Phase I ESA recommendation to test the underlying soil at locations in the vicinity of the RECs (e.g., hydraulic lifts; a clarifier; staining near above ground storage tanks, a paint storage area, a drum storage area, and a parts cleaner; the paint spray booth; and the locations of previously removed underground storage tanks [USTs]) was implemented.

The auto dealership and maintenance and repair facilities were removed in the early 2000s]. It is unknown whether soil beneath the building was tested for the chemicals that would have been associated with its previous use or whether the floor and soil beneath the areas of interest were removed. With the proposed demolition of the existing building and the construction of subsurface parking levels, soil beneath the proposed building would be excavated and removed

from the site. In the event that residual chemicals from the site's previous use are still present, construction workers may be exposed to chemicals above action levels. This would be a significant impact.

To reduce the impact to less than significant, Mitigation Measures HAZ-1, Health & Safety Plan, and HAZ-2, Soil Management Plan, would be prepared and implemented, as described below.

Mitigation Measures

MM HAZ-1 Health and Safety Plan: The project applicant shall require the construction contractor to retain a qualified environmental professional to prepare and implement a site-specific Health and Safety Plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 CCR Title 8, Section 5192). The Health and Safety Plan shall include all required measures to protect construction workers and the general public potentially exposed to hazardous materials by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction area and to reduce hazards outside of the construction area. If prescribed contaminant exposure levels are exceeded, personal protective equipment shall be required for workers in accordance with state and federal regulations. The plan shall include designated personnel responsible for implementation of the Health and Safety Plan. Submittal of the Health and Safety Plan to the project applicant shall not be construed as approval of the adequacy of the contractor's health and safety professional, the contractor's plan, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work.

MM HAZ-2 Soil and Groundwater Management Plan: The project applicant shall require the construction contractor to prepare and implement a Soil and Groundwater Management Plan, subject to review by the project applicant, that specifies the method for handling and disposal of contaminated soil and groundwater prior to demolition, excavation, and construction activities. The plan shall include all necessary procedures to ensure that excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information:

- Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling.
- Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils.
- Detailed control measures for use and storage of hazardous materials to prevent the release of pollutants to the environment, and emergency procedures for the containment and cleanup of accidental releases of hazardous materials to minimize the impacts of any such release. These procedures shall also include reporting

requirements in the event of a reportable spill or other emergency incident. At a minimum, the project applicant or its contractor shall notify applicable agencies.

With the preparation and implementation of Mitigation Measures HAZ-1, Health & Safety Plan, and HAZ-2, Soil Management Plan, potential impacts would be reduced to a less than significant level.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact with Mitigation Incorporated. The Cathedral High School is located at 1253 Bishops Road, west from the project site and across Bishops Road. As previously discussed, project construction could require the use of small quantities of fuel, lubricants, paints, and solvents, and the excavation of soil beneath the existing building could encounter soil with residual chemicals from the previous auto maintenance and repair services at concentrations above action levels. These activities would have the potential to emit hazardous emissions or handle hazardous materials or waste. However, with the implementation of Mitigation Measures HAZ-1, Health & Safety Plan, and HAZ-2, Soil Management Plan, discussed above, the impact would be reduced to less than significant.

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?

Less Than Significant Impact. The project site is listed on the State Water Resources Control Board (SWRCB) GeoTracker website as the Domenich Basso, Inc. site (Case No. T0603790010), a Leaking Underground Storage Tank (LUST) case. This listing refers to the removal of the former USTs at the automobile dealership. The removals are discussed in the Phase I ESA. The listing indicates this case is now closed. A Los Angeles Fire Department (LAFD) application to remove a 1,000-gallon gasoline UST was dated January 3, 1991. The owner of the permit was Domenich Basso. A waste manifest for “underground tank rinsate” was dated March 26, 1991. Further, according to the AES report, a 1,000-gallon UST was removed from the site in 1991.

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. The project site is not located within two miles of a public or private airport. The nearest airport is the Burbank Bob Hope Airport, located approximately 11.75 miles northwest of the project site. Therefore, there would be no impact relative to airports.

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. The project site is not located within two miles of a public or private airport. The nearest private heliport to the project site is the Bank of America Data Center Heliport – 62CA,

located at 1000 W. Temple Street, approximately 1.5 miles from the project site. Therefore, there would be no impact relative to airports.

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

Less Than Significant Impact. The construction activities would involve a number of vehicles using local roads and has the potential to interfere with emergency evacuation routes. However, the construction activities would not require a large number of vehicles and no roads would be closed or restricted. North Broadway is a four lane road with a center lane dedicated to left turns. In addition, Interstate 5 and Highways 101 and 110 can be accessed without traveling through residential neighborhoods. Therefore, impacts relative to affecting designated emergency routes would be considered less than significant.

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?

No Impact. The project site is located within a Very High Fire Severity Zone as determined by CALFIRE. Elysian Park and Radio Hill Gardens are located approximately 0.65 mile and 0.25 mile north of the project site, respectively. However, the proposed project would include fire safety features, including the installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation, if necessary. Further, LAFD Station 1 would be considered the first responder for the project site, and would ensure fire protection services in the event of a fire. Therefore, there would be no impact relative to wildfires (Calfire, 2007a, 2007b; ZIMAS, 2017).

Cumulative Impacts

Hazards and Hazardous Materials

As discussed above, the project would have no impact with respect to being located within two miles of an airport or wildland fire hazards. Accordingly, the proposed project could not contribute to cumulative impacts related to these topics.

The geographic scope of analysis for cumulative hazards and hazardous materials impacts encompasses the proposed project site and nearby areas that could affect conditions within the project area. Significant cumulative impacts related to hazards could occur if the incremental impacts of the proposed project combined with the incremental impacts of one or more cumulative projects to substantially increase risk that people or the environment would be exposed to hazardous materials.

All cumulative projects would be subject to the same regulatory requirements noted above, including the implementation of health and safety plans and soil and groundwater management plans. That is, cumulative projects involving releases of hazardous materials also would be required to remediate their respective sites to established regulatory standards. This would be the case regardless of the number, frequency, or size of the release(s), or the residual amount of

chemicals present from previous spills. And so, while it is possible that the proposed project and cumulative projects could result in releases of hazardous materials at the same location, the responsible party associated with each spill would be required to remediate site conditions to the same established regulatory standards. The residual less-than-significant effects of the proposed project that would remain after mitigation would not combine with the potential residual effects of cumulative projects to cause a potential significant cumulative impact because residual impacts would be highly site-specific. Accordingly, no significant cumulative impact with respect to the use of hazardous materials would result.

9. Hydrology and Water Quality

Portions of the following impact analysis pertaining to hydrology and water quality are based on information contained in the Civil Engineering Technical Memo (Civil Engineering Memo) prepared by KPF Consulting Engineers on April 4, 2017. The Civil Engineering Memo is included as Appendix H of this IS/MND.

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The project site is entirely impervious and generally flat, and stormwater runoff from the project site is conveyed by sheet flow towards the sidewalk and into the curb and gutter along North Broadway. The combined project flow and street flows then flow into the catch basin at the corner of North Broadway and Bishops Road. The basin then leads to a 12-inch Reinforced Concrete Pipe (RCP) storm drain in Bishops Road that ultimately leads to a 33-inch Vitrified Clay Pipe (VCP) that flows southerly on North Broadway.

Construction of the project would require earthwork activities, including grading and excavation for basement parking, which would expose soils for a limited time and could allow for possible erosion, particularly during precipitation events. However, as stated in Response No. 6.b above, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels. Grading and site preparation would also comply with all applicable provisions of Chapter IX, Division 70 of the LAMC, which includes requirements such as the preparation of an erosion control plan to reduce the effects of sedimentation and erosion.

In addition, the applicant would be required to meet the provisions of the project-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A, Construction Activities. As part of these regulatory requirements, Best Management Practices (BMPs) would be implemented to control erosion and to protect the quality of surface water runoff during the construction by controlling potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. Should grading activities occur during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) would be prepared pursuant to the "Manual and Guideline for Temporary and

Emergency Erosion Control,” adopted by the Los Angeles Board of Public Works. If groundwater is encountered during excavation for the subterranean parking levels, it would be tested, treated, and disposed of in accordance with the Los Angeles Regional Water Quality Control Board’s (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2013-0095, General NPDES Permit No. CAG994004). With adherence to applicable regulations, adverse impacts to groundwater quality would be avoided through implementation of BMPs recommended for such construction activity.

Project operation would be required to incorporate operational BMPs per the City of Los Angeles Low Impact Development (LID) Ordinance permit requirements. As stated in the Civil Engineering Memo, provided as Appendix H in this IS/MND, if infiltration is determined to be a feasible BMP for the project, three 4-foot diameter deep infiltration drywells will be required. A final geotechnical report with infiltration recommendations specific to proposed building construction plans will be required to determine feasibility of an on-site infiltration system. [If stormwater capture and use are used, an approximately 15,430-gallon rainwater cistern would be required. The cistern would need to be emptied at least once during the rainy season for capture and use to be feasible. Should the drywells and cistern be determined to be infeasible, a bio-infiltration or bio-retention system would be required. A combination system may be permitted to meet the LID stormwater treatment requirement. Additional long-term BMPs would be provided to support the infiltration system and may include, but are not limited to, ensuring that discharge from downspouts, roof drains, and scuppers would not be permitted on unprotected soils. Further, all storm drain inlets and catch basins within the project area would be stenciled with prohibitive language and/or graphical icons to discourage illegal dumping. The final selection of any additional BMPs would be completed through coordination with the City of Los Angeles. Prior to issuance of grading permits, the applicant shall submit a LID Plan and/or Standard Urban Stormwater Mitigation Plan (SUSMP) to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan and/or SUSMP shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. BMPs will be designed to retain or treat the runoff from a storm event producing 0.75 inches of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet this numerical threshold standard shall be provided. Through preparation of the LID plan and implementation of the appropriate BMPs, operational water quality impacts of the project would be less than significant.

Regarding the quantity of stormwater runoff, the existing site does not currently meet the requirements of the City’s current LID Ordinance, which requires the project to treat and infiltrate the runoff from a storm event producing of the 85th percentile rainfall in a 24-hour period. Under existing conditions, stormwater flows directly off the project site and into the City’s storm drain system. The existing site is currently fully developed or paved, which means that it is already entirely impervious. Therefore, development of the project site would not increase the volume or flow rate of the storm runoff. Accordingly, the project would result in a less than significant impact with regard to the quantity of stormwater flows from the project site. Based on the above,

impacts related to water quality would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including the Metropolitan Water District's Colorado River and Feather River supplies (57%, Bay Delta 48%, Colorado River 8%), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29%), local groundwater from the San Fernando groundwater basin (12%), and recycled water (2%) (LADWP, 2016a). Based on the City's most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater (LADWP, 2016b). Although urban open space does provide for some infiltration to smaller unconfined aquifers, the majority of groundwater recharge in the region occurs via stormwater runoff from nearby mountain ranges. Groundwater levels in the City are also maintained through an active process via spreading grounds and recharge basins. The project site is not an area identified as being important to groundwater recharge. Additionally, no groundwater production wells are located in the vicinity of the project site.

It is anticipated the proposed infiltration well would infiltrate storm runoff at 40 feet below ground. However, the small size of the project site limits its potential to contribute to recharge of groundwater sources. In addition, the maximum depth of infiltration would be maintained a minimum of 10 feet above groundwater in accordance with the City of Los Angeles Department of Building and Safety Guidelines for Stormwater Infiltration (P/BC-2008-118).

According to the Civil Engineering Memo, provided as Appendix H in this IS/MND, it was estimated that groundwater was not encountered in the nearby borings of a depth of 50 feet below site grade. Review of the historical groundwater level through the Seismic Hazard Zone Report of the Hollywood 7 ½-Minute Quadrangle indicates that the historically highest groundwater level is on the order of 20 feet below the ground surface. Because the proposed project specifies two levels of subterranean parking, which would extend approximately 26 feet below the site grade, it will be determined during project construction whether or not dewatering operations may be necessary. If dewatering is necessary, it can be done so without interfering with groundwater supplies. Therefore, project construction and operations will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Impacts would be less than significant. No mitigation measures are required.

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?

Less Than Significant Impact. During project construction, temporary alteration of existing on-site drainage patterns may occur. However, these changes would not result in substantial erosion or siltation due to stringent controls imposed via City grading and building permit regulations as discussed in Response No. 9.a, above. As stated above in Response No. 9.a and in the WVECP, specific locations where erosion and sediment control measures would be installed for each permanent or temporary site drainage pattern that would occur before, during, and after construction.

The project site currently constitutes a single drainage subarea (City of Los Angeles, 2016). Sheet runoff currently goes into the catch basin at the corner of N. Broadway and Bishops Road. The basin ultimately leads to existing City of Los Angeles 12-inch RCP and 33-inch VCP.

Development of the project's proposed building, open space areas, and associated infrastructure would be connected to the proposed stormwater drainage system, and thus, the project site would continue to function as a single drainage subarea as under existing conditions. The existing storm drain conveyance system has a 50-year storm flow of approximately 2.36 cubic feet per second (cfs).

The overall drainage pattern would remain the same as under existing conditions, after filtration of water via the on-site detention system, with all stormwater flows from the project site eventually draining to the storm drain system. There would be no increase in runoff because the project site will continue to be totally impervious, as well as and have BMPs. As stated in the LADWP service availability request (SAR), provided in Figure 7 of the Civil Engineering Memo, the 24-inch main in North Broadway will have capacity for the project. The applicant would be responsible for providing the necessary storm drain infrastructure to serve the project site, as well as any extensions to the existing system in the area. As a result, project development would not result in substantial erosion or siltation on- or off-site. Therefore, a less than significant impact is anticipated. No mitigation measures are required

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

Less Than Significant Impact. While the project site is under construction, the rate and amount of surface runoff generated at the project site would fluctuate. However, the construction period is short-term and compliance with applicable regulations discussed above would preclude fluctuations that result in flooding. With regard to operations, the project proposes three 4-foot diameter deep infiltration drywells. If stormwater capture and use will be used, an approximately 15,430-gallon rainwater cistern will be required. The cistern will need to be emptied at least once during the rainy season for capture and use to be feasible. Should the drywells and cistern be determined to be infeasible, a bio-infiltration or bio-retention system will be required. A combination system may be permitted to meet the LID stormwater treatment requirement. With

implementation of the project's drywell system or other BMPs, as well as compliance with applicable LID requirements, the project is anticipated to decrease the quantity of stormwater leaving the project site. As stated in the SAR, provided in Figure 7 of the Civil Engineering Memo, the eight-inch main in Second Street will have capacity for the project. As there are no known deficiencies in the existing storm drain system, the project would result in a less than significant impact.

Additionally, the project site is not located adjacent to any unchannelized stream or river, and project runoff would continue to drain into existing City storm drain infrastructure. There is no known potential of downstream erosion or flooding since the storm drain system is completely channelized in subterranean pipes. Therefore, the project would not have the potential to result in flooding due to altered drainage patterns and impacts would be less than significant.¹⁰ No mitigation measures are required.

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?

Less Than Significant Impact. As noted previously, overflow runoff from the project site in excess of required detention volumes would continue to flow into the City's storm drain system. There are no known deficiencies in the local stormwater system. As discussed above, the project would decrease stormwater flow volumes during the design year storm through the implementation of the dry wall system installed in accordance with the City's LID requirements. As stated in the SAR, the 24-inch main in North Broadway will have capacity for the project. Therefore, the project would have a less than significant impact with respect to exceedance of storm drain system capacity or the generation of polluted runoff. No mitigation measures are required. See Response No. 9.a, above, for a discussion of potential project impacts related to water quality.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed above in the Response No. 9.a, construction and operational BMPs implemented as part of the project's SWPPP and SUSMP, and good housekeeping practices during project construction and operation would preclude sediment and hazardous substances from entering stormwater flows. Therefore, the project would have a less than significant impact in surface water quality and no mitigation measures are required. No mitigation measures are required.

¹⁰ This finding took into consideration the 2006 *City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water hydrology, as a project could have a significant impact on water hydrology if it would cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water in a water body; or 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.

- g. Place housing within a 100-year flood plain as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h. Place within a 100-year flood plain structures which would impede or redirect flood flows?**

No Impact (g-h). The project site is not located within a flood zone, including the 100-year flood zone designated by the Federal Emergency Management Agency (FEMA) (City of Los Angeles, 2016; FEMA, 2008). No flood zone impacts would occur and no mitigation measures would be required.

- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

Less Than Significant Impact. As discussed in Response No. 9.g and h above, the project site is not located within a designated floodplain. The project site is not located within a potential river inundation area, being located west of the inundation area for the Los Angeles River (City of Los Angeles, 1994). According to the Civil Engineering Memo, the project site is not located within a flood zone associated with the Mulholland Dam. Therefore, a less than significant impact associated with flooding, including flooding due to the failure of a levee or dam, would occur. No mitigation measures are required

- j. Inundation by seiche, tsunami, or mudflow?**

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

As stated in Response No. 9.i, above, the project site is not located within a City-designated inundation hazard area (City of Los Angeles, 1994). Relative to tsunami hazards, the project site is located approximately 15 miles inland (northeast) from the Pacific Ocean, and therefore, would not be subject to a tsunami. Furthermore, the project site is not located on a City-designated tsunami hazard area (City of Los Angeles, 1994). The project site itself is characterized by relatively flat topography. While there exists a nominal potential for mudflows in the hillsides north of the project site, the relatively high amount of urbanization, landscaping, and natural vegetation within these hillside areas would generally limit the potential for large volumes of earth materials to become unstable and form a significant mudflow. Further, intervening structures, vegetation, roadways, and other obstacles would generally limit adverse physical effects to on-site development if a mudflow were to occur north of the project site. Therefore, no impacts would occur due to inundation by seiche or tsunamis, and mudflow impacts would be less than significant. No mitigation measures are required

Cumulative Impacts

Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the project site. Pursuant to the City's LID Ordinance, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's SUSMP BMPs, through one or more of the City's preferred SUSMP improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs.

Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Projects greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Bureau of Engineering reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. As such, compliance with applicable regulatory requirements would avoid significant impacts to drainage/flooding conditions and the quality of water reaching the public drainage system. As previously stated, the relatively high amount of urbanization, landscaping, and natural vegetation in the project vicinity would generally limit the potential for large volumes of earth materials to become unstable and form a significant mudflow. Further, intervening structures, vegetation, roadways, and other obstacles would generally limit adverse physical effects to on-site development if a mudflow were to occur. Therefore, the project's incremental contribution to cumulative hydrology and water quality impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

10. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The project site is currently developed with an existing office building and associated surface parking lot. The project vicinity is urbanized and generally built out. The local vicinity is characterized by a blend of commercial, retail, restaurant and low-rise residential uses, as well as a school facility. The proposed project would provide a new mixed use development that would include residential uses and a ground floor commercial use that may include retail uses. As such, the proposed project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the project vicinity, and the infill character of the proposed project, it would not physically divide an established community. The proposed project would not disrupt or divide an established community through a change in street or land use patterns on surrounding streets.

Thus, given the existing mix of uses in the project vicinity and the location of the project site within an existing developed site, the proposed project would not physically divide, disrupt, or

isolate an established community. Therefore, impacts with respect to the division of an established community would be less than significant.

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?

Less Than Significant Impact. Discretionary entitlements, reviews, and approvals required for implementation of the proposed project would include, but would not necessarily be limited to the following:

- Pursuant to Los Angeles Municipal Code Section 16.05, the applicant requests Site Plan Review for a proposed project that will result in an increase of more than 50 dwelling units.
- Pursuant to LAMC Section 17.01, the applicant requests approvals of Vesting Tentative Tract Map No. 74785 to permit the merger and subdivision of the subject parcels necessary to facilitate the development of a mixed-use project.

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation. The Framework Element encourages locating the highest development intensities with one-quarter mile of a transit station and including "a considerable mix of uses" so as to "provide population support and enhance activity near stations". The Framework Element also calls for commercial development along the City's arterial corridors to be intensified with new projects that integrate commercial and residential uses.

The Long Range Land Use Diagram for Metro Los Angeles shows the project site has a land use designation of Regional Center, with planned intensity of development from 1.5:1 to 6.0:1. As discussed below in **Table B-8, Comparison of the Proposed Project to the Applicable Land Use Policies of the Framework Element**, the proposed project would be consistent with applicable objectives of the General Plan Framework. Specifically, the proposed project would be consistent with the Framework Element as follows:

- The proposed project would be consistent with the objectives of the Housing Element as it would include the location of new multi-family housing development in proximity to transit stations and to provide adequate buffers between higher intensity uses and adjacent residential neighborhoods. It would place housing on an existing parking lot and would not require demolition of housing units in the neighborhood.

- The proposed project would provide its mix of uses in proximity to a broad range of interconnected land uses within walking distance and would stimulate pedestrian activity. The proposed project would be integrated with the surrounding area by providing a new ground level commercial uses and amenities on what is presently underutilized office building and would include new street trees and landscaping.
- The proposed project would contribute 118 new housing units to help meet regional and local needs. This housing would replace an existing office building and surface parking, thereby avoiding adversely encroaching on low density housing neighborhoods or requiring their conversion to meet the City’s housing needs.
- The project site is located within a TPA, and would meet the objectives of the land use, economic and housing policies of the General Plan Framework to provide a diversity of uses, including commercial uses and residential uses, in proximity to transit. The proposed project’s mixed use, economic and housing goals to enhance urban lifestyles with proximity to services, entertainment, retail, and transit.

As the proposed project would not conflict with the General Plan Framework Element land use designation and objectives, impacts with respect to the Framework would be less than significant.

**TABLE B-8
COMPARISON OF THE PROPOSED PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE FRAMEWORK ELEMENT**

Policy	Analysis of proposed project Consistency
Land Use Chapter	
<p>Goal 3A: A physical balanced distribution of land uses that contributes toward and facilitates the City’s long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment.</p>	<p>Consistent. The proposed project would consist of a mixed-use residential development, including 8,795 sf of ground floor commercial uses and 118 residential units above. The proposed project would revitalize an underutilized project site currently occupied by a single-story office building and associated surface parking. proposed project vehicle trips would be reduced by residents having access to multiple transit options that service the greater Los Angeles region, including the Metro Gold Line Light Rail Chinatown Station, located approximately 0.5 mile southwest of the project site, and several DASH and Metro bus lines. The introduction of new residential and commercial uses would assist in revitalizing the area by providing new services and would provide new housing opportunities that would serve a variety of income levels.</p>
<p>Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.</p>	<p>Consistent. The proposed project would introduce a mixed-use residential development, including 118 residential units and 8,795 sf of ground floor commercial uses to the project vicinity. This would provide new housing in the area to accommodate new and existing residents, as well as provide new employment opportunities.</p>
<p>Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.</p>	<p>Consistent. The proposed project would be developed in an infill location in proximity to existing residential and commercial businesses and a variety of public transportation options, which would reduce trip lengths and associated emissions. Specifically, the project site is located within 0.5 mile of the Metro Gold Line Light Rail Chinatown Station, which connects to the Los Angeles Union Station and the Metro Red and Purple Line Heavy Rail Lines. Further, several DASH and Metro bus lines are located in front of the project site, which provide connections to the greater Los Angeles region. The new residential population would have access to commercial development on site, as well as other retail and commercial services within walking distance to the southwest.</p>

Policy	Analysis of proposed project Consistency
<p>Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The proposed project would provide new residents, jobs, and services within close proximity of pedestrian, roadway, and transit networks. The new residential population would have access to the commercial development onsite as well as a considerable amount of retail, restaurant, and public service activities within walking distance and via bus and rail services. By locating the proposed project's residential uses within a mixed-use area, the proposed project would provide housing opportunities outside of existing neighborhoods, thereby preserving those neighborhoods.</p>
<p>Goal 3F: (Regional Centers) Mixed-use centers that provide jobs, entertainment, culture, and serve the region.</p>	<p>Consistent. The proposed project would serve the region by providing a mix of additional new market-rate housing options, leasable commercial space and opportunities for employment. The proposed project would bring more pedestrian activity to the area, which will stimulate economic development and further promote cultural awareness and preservation of the urban lifestyles derived from the rich history of proximate Chinatown in relation to Downtown Los Angeles' urban core.</p>
<p>Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.</p>	<p>Consistent. The proposed project would reinforce existing and encourage the development of new regional centers by providing new commercial/retail space designed to activate the surrounding neighborhood, while adding new housing opportunities to the neighborhood. The proposed project would increase the population of residents who serve as customers for existing retail, commercial and restaurant uses in the neighborhood.</p>
<p>Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.</p>	<p>Consistent. The proposed project would activate the streetscape by orienting ground-level commercial uses and ground-level amenities toward the N. Broadway frontage. The siting of the proposed project would include 39 new onsite and street trees.</p>
Housing Chapter	
<p>Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</p>	<p>Consistent. The proposed project would introduce 118 residential units within close proximity of several mass transit options. The proposed project would be located within an urban area, with a variety of different commercial, retail, and residential uses.</p>
Economic Development Chapter	
<p>Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial use.</p>	<p>Consistent. The project site would be located in a developed area, with commercial and residential uses located within the project vicinity. The proposed project would include the development of a mixed-use project consisting of 8,795 sf of ground floor commercial uses and 118 residential units. The proposed project would be consistent with the surrounding development in the project vicinity.</p>
<p>Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p>	<p>Consistent. The proposed project would include 8,795 sf of ground floor commercial uses and 118 residential units, which would create more housing opportunities for people in the area, include the creation of 42 new jobs, and would complement the nearby commercial, service, and residential uses in the neighborhood.</p>
<p>Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs.</p>	<p>Consistent. The proposed project would include 8,795 sf of ground floor commercial uses that would be open to the public that would complement nearby commercial, service, and residential uses in the area.</p>
<p>Goal 7G: A range of housing opportunities in the City.</p>	<p>Consistent. The proposed project would include a mix of housing units, include 84 studio units, 18 one-bedroom units, and 16 one-bedroom + den units, which would increase the amount of housing opportunities available in the project vicinity.</p>

Policy	Analysis of proposed project Consistency
<p>Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.</p>	<p>Consistent. The proposed project would include 118 residential units. The new units would include a range of sizes from studios to one bedroom with den, and would be located in close proximity to a variety of mass transit options for connectivity throughout the greater Los Angeles region. The proposed project would include 8,795 sf of ground floor commercial uses, which would provide 42 new jobs and would service the residential population in the area.</p>
<p>Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.</p>	<p>Consistent. The proposed project would provide new mixed-use development in an area served by a light rail station and multiple bus lines. The proposed project would be located within a mixed use urban area and would not encroach upon any existing residential neighborhoods.</p>
Urban Form and Neighborhood Design Chapter	
<p>Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.</p>	<p>Consistent. The proposed project would provide a new mixed-use development that improves the aesthetic quality of the project site through the creation of a high-quality mixed-use commercial and residential development that would include new landscaping, ground-level amenities, and commercial uses. The proposed project would increase the housing choices for residents residing in the Central City North Community Plan Area and throughout the City of Los Angeles. The project site is located adjacent to transit and bus lines which would increase housing opportunities for those wishing to reside near public transportation. As such, the proposed project would support the policy of creating a livable City for existing and future residents and attract further investment in the area.</p>
SOURCE: ESA PCR, 2016.	

Central City North Community Plan

The Central City North Community Plan, adopted in December 2000, identifies and establishes goals and policies for land use within the Community Plan Area. As discussed in **Table B-9, Comparison of the Proposed Project to the Applicable Land Use Policies of the Adopted Central City North Community Plan**, several goals and policies within the Central City North Community Plan identify the need for mixed use projects in proximity to transit stations, transit corridors, and commercial areas.

The Central City North Community Plan currently designates the project site as a Regional Commercial land use. Within the existing Central City North Community Plan Area, the maximum allowable FAR is 6 to 1, imposed by Height District 2.

The existing project site is developed with a single-story office building and associated surface parking. The proposed project would develop 118 residential units and is allowed under the adopted Central City North Community Plan land use designation and zoning. The development of the proposed project is currently allowable under the existing zoning designations and general plan land use designations. The C2-2D zoning designation permits residential uses and would be consistent with the existing pattern of development in the surrounding area, which consists of many commercial and residential uses. The proposed project is also consistent with the Regional Commercial land use designation of the Central City North Community Plan.

TABLE B-9
COMPARISON OF THE PROPOSED PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE
ADOPTED CENTRAL CITY NORTH COMMUNITY PLAN

Goal/Policy/Objective	Analysis of proposed project Consistency
Residential Policies	
Goal 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.	
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Central City North Plan area to the year 2010.	The project site includes an existing single-story office building and associated surface parking. Currently, no housing is located onsite, and therefore, no housing would be removed as part of the proposed project. The proposed project would provide new housing with a range of sizes, from studio units to one bedrooms and den units, and is in walking distance of a regional light rail station and several bus lines.
Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	The proposed project would be developed in an infill location in close proximity to existing residential, commercial businesses and several public transportation options, which would minimize trip lengths and associated emissions. Specifically, the proposed project is in close proximity to the Metro Gold Line Light Rail Chinatown Station, and several bus lines that would provide the project site connectivity to the greater Los Angeles region. The new residential population would have access to commercial development on the project site as well as other commercial establishments and services within walking distance of the project site.
Policy 1-4.2: Ensure that new housing opportunities minimize displacement of the existing residents.	The proposed project would be an infill development, which includes an existing single-story office building and associated surface parking. No housing is currently located onsite, and no housing would be removed as part of the proposed project. Therefore, the proposed project would not displace any existing residents.
Commercial Policies	
Goal 2: A strong and competitive commercial sector which best serves the needs of the community and to provide additional opportunities for new commercial development and services.	
Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.	The proposed project would include the development of 8,795 sf of ground-level commercial uses, which would provide services to the project's residents as well as the residents in the surrounding neighborhood.
Objective 2-2: To attract uses which strengthen the economic base and expand market opportunities for existing new businesses.	The proposed project would include the development of ground-floor commercial uses, which would be open to the public and service the surrounding neighborhood. The proposed project would strengthen the economic base by providing jobs and employment to the area.
Policy 2-2.2: New development needs to add to and enhance the existing pedestrian street activity.	The proposed project would introduce ground-level commercial uses that would front N. Broadway, which is a major transportation corridor. The proposed project would introduce new landscaping to the streetscape, including four new street trees, which would enhance the pedestrian experience and street activity in the area.
SOURCE: ESA PCR, 2016.	

Further, despite the proposed project's land use designation as a Regional Commercial Center, many of the commercially zoned and developed lots in the project vicinity contain structures of

no more than two-stories in height. According to the Central City North Community Plan, Chinatown consists of a mix of low-rise building types with pedestrian-oriented storefronts along various streets including segments of Broadway. The proposed project seeks to continue this defining feature of Chinatown as well as smart Transit-Oriented Development (TOD) in the City. The proposed project includes ground floor commercial and retail space that activates the North Broadway and Bishops Road sidewalks, along with the provision of attractive streetscapes and substantially widened sidewalks that would enhance the pedestrian experience in the area. The proposed project would generate a resident population that would patronize the nearby restaurants, retail, businesses, banks, and professional offices in the Central City North Community Plan Area. Therefore, impacts with respect to consistency with the Community Plan would be less than significant.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods. The 2013-2021 Housing Element, an update to the previous 2006-2014 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013. Policies of note include Policy 1.1.3, which states the City should "[f]acilitate new construction and preservation of a range of housing types that address the particular needs of the city's households." Also, Policy 1.1.4 states that the City should "[e]xpand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards." The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage infill development and increase density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit.

The Housing Element encourages new construction of a range of different housing types that address the needs of the City's households. Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate income households.

The proposed project would provide 118 new dwelling units in a higher-intensity, mixed-use area with a designated Regional Center near numerous public transit options and within walking distance to commercial, retail, restaurant, entertainment, and office uses. The proposed project would offer a mixture of studio, one, and one bedroom with den units. The proposed project's location proximate to Downtown Los Angeles would provide new residents who may wish to reside near downtown amenities with alternative market-rate housing options. The proposed project would not remove any existing housing, and would complement the scale and character of the lower-density residential neighborhoods surrounding the project site. Therefore, the proposed project would be consistent with the Housing Element.

Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

In April 2016, SCAG’s Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region’s transportation and related challenges. Further, the 2016 RTP contains baseline socioeconomic projections that are used as the basis for SCAG’s transportation planning, and the provision of services by other regional agencies. The RTP/SCS includes goals and policies that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region’s transportation investments, and security of the regional transportation system.

SCAG’s 2016 RTP/SCS incorporates several policies that are applicable to the proposed project. These SCAG policies are discussed below. **Table B-10, Consistency of the Proposed Project with Applicable Policies of the 2016–2040 Regional Transportation Plan**, below, provides a detailed analysis of the proposed project’s consistency with applicable RTP policies in a side-by-side comparison.

**TABLE B-10
COMPARISON OF THE PROPOSED PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE
2016-2040 SCAG REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY**

Policy	Analysis of proposed project Consistency
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent. This policy pertains to SCAG funding and policies. The proposed project would not adversely affect the capacity to align plan investments and policies with economic development and competitiveness. As the proposed project does provide regional economic benefits and does so in a manner consistent with other RTP policies as discussed below, the proposed project would support SCAG choices regarding this policy.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	The proposed project would be located in close proximity to the Metro Gold Line Light Rail Chinatown Station and numerous bus lines, as well as the regional freeway system, and would maximize mobility and the accessibility to the project site.
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	The proposed project would be designed in compliance with City Standards. As shown in Section 8, Hazards and Hazardous Materials; Section 14, Public Services; and Section 16, Transportation/Traffic of this IS/MND, there are no significant impacts related to hazards, emergency access, or hazards. Therefore, the proposed project is in compliance.
Goal 4: Preserve and ensure a sustainable regional transportation system.	Consistent. The proximity of the proposed project to alternative transit modes, including regional rail and bus line services, would support the region’s transportation investment and the sustainability of the regional transportation system.

Policy	Analysis of proposed project Consistency
Goal 5: Maximize the productivity of our transportation system.	Consistent. The proposed project would locate a residential development in an area served by a range of existing local and regional bus lines and the Metro Gold Line Light Rail Chinatown Station. The proximity of residential uses to transit systems would maximize the productivity of the transportation system and, as such, would be consistent with this policy.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent. The proposed project would be located in an infill location in proximity to existing residential and commercial businesses and numerous public transportation options, which would minimize trip lengths and associated emissions. The proposed project would comply with Los Angeles Green Building Code and 2013 CALGreen Code. The proposed project's commercial development would be along a mixed-use corridor that would provide opportunities for pedestrian and bicycle transit. The proposed project would include up to 156 bicycle parking spaces (133 long-term, 13 short-term, and 10 for commercial parking).
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	Consistent. As noted above, the proposed project would support a land use pattern that provides increased opportunity for use of alternative transportation which would contribute to reductions in vehicle miles traveled with resulting benefit to energy efficiency.
Goal 8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent. The proposed project would intensify development in an area served by the Metro rail service and numerous regional Metro bus lines. Furthermore, the proposed project would provide a commercial uses in an area with pedestrian access to a range of commercial and entertainment services as well as numerous job opportunities.
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent. This policy pertains to security provided by regional service agencies. The proposed project would not adversely affect the ability of the service agencies to perform their duties. By providing a mixed-use development, the proposed project would contribute towards economic growth and increased use of public transportation systems that would generate revenue that could be used to support security of the regional transportation system

SOURCE: ESA PCR, 2016.

Based on the analysis presented in Table B-10, the proposed project would be consistent with 2016 RTP/SCS goals to improve regional economic development, maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, maximize the productivity of the transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. Therefore, the proposed project would result in a less than significant impact with regard to plan consistency

Los Angeles Municipal Code

Zoning

The project site has an existing zoning designation of C2-2D, C2 Commercial Zone Height District 2 Development Limitation and land use designation of Regional Commercial, which

permits residential uses. This zone and land use designation permits a residential density of one dwelling unit per 200 sf of lot area, which would allow a maximum total of 149 units. The proposed project would include the development of 8,795 sf of ground-floor commercial uses and 118 residential units. The proposed project would not require an amendment to the Zoning Code or the General Plan, as the proposed project would be allowable and consistent with the currently zoning and land use designations.

Floor Area

The proposed project has an existing zoning designation of C2-2D (Commercial Height District 2 Development Limitation) under the Central City North Community Plan. The height designation, with the associated Development Limitation (D) permits a 3:1 FAR for the entire site, for a total of 89,772 sf of allowable floor area. The proposed project would develop 89,434 sf of floor area, or a 2.99 FAR.

Height

The building height is unlimited within Height District No. 2, and is determined by the permitted Floor Area Ratio. Height is unlimited in Height District 2. Per the LAMC, the proposed project would achieve a total building height of 78 feet 6 inches.

Density

The proposed project would have a zoning designation of C2, which would permit a residential density of one dwelling unit per 200 sf of lot area, which would allow a maximum of 149 units. A total of 118 units are proposed. The mix of residential units proposed includes 84 studio units, 18 one-bedroom units, and 16 one-bedroom with den units.

Setbacks

The proposed project would meet the required setback pursuant to LAMC Section 12.22 A.18(C), which states no yard requirements shall apply to the residential portions of buildings located on lots in the CR, C1, C1.5, C2, C4, and C5 zones 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 portion of such buildings.

Open Space

Section 12.21.G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at minimum, the following useable open space area per dwelling unit: 100 sf for each unit having less than three habitable rooms and 125 sf for each unit having three habitable rooms. Based on these requirements the proposed project is required to provide 12,200 sf of open space.

The proposed project would exceed the LAMC requirements by providing 17,457 sf of open space and amenities. Open space amenities would include 8,509 sf of common exterior landscaped roof deck on Level 2, 822 sf of common interior amenity space on Level 2, and 3,076

sf of common exterior open space on Level 7. The podium deck would include recreational opportunities, such as a pool/spa and lounge area.

Pursuant to LAMC Section 12.21.G.3, a minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees. At least one 24-inch box tree for every four dwelling units shall be provided onsite, and may include street trees in the parkway. Therefore, the proposed project would provide 39 trees for the proposed 118 residential dwelling units.

Parking

The proposed project proposes to provide 170 vehicular parking spaces onsite. The following discussion outlines the applicable parking standards/policies for the proposed project's commercial and residential uses.

Commercial Uses

The project site requires a parking ratio of two spaces per 1,000 gross sf of commercial uses, pursuant to LAMC Section 12.21-A(c). The proposed project would develop 8,795 sf of commercial space and thus, the proposed project would require 18 parking spaces for commercial uses. The proposed project would exceed the LAMC requirements and would provide 19 parking spaces for the 8,795 sf of commercial uses.

Residential Uses

Pursuant to LAMC Section 12.21-A.4, the required parking in a residential development project would require one parking space for a studio, 1.5 parking spaces for a one-bedroom, and two parking spaces for units greater than one-bedroom. Therefore, the proposed project would require 84 parking spaces for 84 studio units, 27 parking spaces for 18 one-bedroom units, and 32 parking spaces for 16 units that are greater than one-bedroom, for a total of 143 parking spaces.

Bicycle Parking

Pursuant to LAMC Section 12.21-A.16, the proposed project would be required to provide a minimum of 140 bicycle parking spaces. For commercial uses, the proposed project is required to provide five short-term and five long-term bicycle parking spaces for commercial uses. For residential uses, the proposed project is required to provide 12 short-term and 118 long-term parking spaces. The proposed project would meet the LAMC requirements and provide 156 bicycle parking spaces (146 residential bicycle spaces and 10 commercial bicycle spaces).

Vesting Tentative Tract Map

Pursuant to LAMC 17.01, the proposed project would require the approval of a Vesting Tentative Tract Map to permit the merger and subdivision of the subject parcels necessary to facilitate the development of a mixed-used project.

The proposed project consists of the development of a mixed-use residential development on an approximately 29,924 sf site, comprised of three contiguous parcels (APNs 5414-021-007, 5414-021-008, and 5414-021-021).

Finally, the applicant is also requesting that pursuant to LAMC Section 16.05, an approval of Site Plan Review for a project which creates more than 50 residential units.

The purposes of Site Plan Review are to promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City's environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.

Based on the above, the proposed project, with approval of the requested discretionary approvals, would not conflict with an applicable land use plan, policy or adopted for the purpose of avoiding or mitigating an environmental effect. Thus, less than significant impacts would occur with proposed project implementation.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The project site is located within the highly urbanized Central City North Community Plan Area. The project site is currently developed with an existing single-story office building and associated surface parking lot. As stated in Response No. 4.b above, the project site is not located within or adjacent to an SEA (City of Los Angeles, 2001). No designated riparian habitat or natural communities exist on the project site or in the surrounding area. Additionally, there is no adopted Habitat HCP, NCCP, or other approved local, regional, or State habitat conservation plan in place for the project site (CDFW, 2005). Therefore, the proposed project would not conflict with any habitat conservation plan or natural community conservation plan. No impact would occur in this regard.

Cumulative Impacts

Land Use and Planning

Related projects would be located primarily within the Central City North Community Plan Area and would have general access or proximity to public transit. The intensification of development within this area would be consistent with the intent of the General Plan Framework, which encourages a diversity of land uses, including commercial and residential uses, in proximity to transit. In addition, many related projects feature mixed-use components that provide housing and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with the objectives of the General Plan Framework and other adopted plans. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, land use impacts would be less than significant. Any related projects requesting discretionary approvals, such as changes to General Plan or zoning would be vetted through environmental review and only allowed at discretion of the City and with consideration of consistency with applicable plans.

The related projects are in urbanized areas that are nearly fully developed and therefore most opportunities to build involve infill development or recycling previously developed property. As the related projects are in-fill development and, while increasing density, the project would not alter the basic land use patterns.

The proposed project would be consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, the SCAG's 2016 RTP/SCS, and the Central City North Community Plan. Specifically, the proposed project is consistent with goals and policies contained within these plans that aim to provide a range of housing opportunities in the City, improve the pedestrian environment, support mixed use development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high quality development that is compatible with existing uses and development.

Further, the proposed project would not require a general plan amendment or a zone change amendment as the project would be consistent with the existing C2-D zone designation and Regional Commercial land use designation of the community plan.

Therefore, the proposed project's contribution to cumulative impacts would not be cumulatively considerable and cumulative land use and planning impacts would be less than significant.

11. Mineral Resources

Would the project:

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

No Impact. Oil and gas, mineral resources of value to the region and State, are the primary mineral resources within the City of Los Angeles. These resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally, State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers. Within the City of Los Angeles, oil drilling districts and oil fields are concentrated in an area reaching from downtown Los Angeles to just west of the 405 Freeway, and in the north San Fernando Valley.

As shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, the nearest mineral resources to the project site are the LA City Oil Field and its respective State Designated Oil Field, which are located to the northwest of the project site located between Wilshire Boulevard and 3rd Street, extending to the west of Vermont Avenue on its west edge and to the east to approximately Figueroa Street on its east edge (City of Los Angeles, 1994). The Union Station Oil Field is located to the south of the project site north of Whittier Boulevard and south of Beverly Boulevard near Alameda Street. Both of these fields are designated as "major drilling areas." The project site does not encroach on either of these nearby major oil drilling districts and fields and, as such, would not result in the loss of availability of this known mineral resource. Therefore, there would be no impact to mineral resources.

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?

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley (City of Los Angeles, 2016). Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the project site. Because the proposed project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, as well as not being located within a City oil drilling district or State designated oil field, it would not result in the loss of availability of these locally-important mineral resources. Therefore, there would be no impact to locally-important mineral resources.

Cumulative Impacts

Mineral Resources

Because of the large number and broad extent of City oil drilling districts and State-designated oil fields in the project study area, including the LA City Oil Drilling District and its respective State Designated Oil Field, to the northwest of the project site and the Union Station Oil Field is located to the south of the project site, some of the related projects would be located within these designated areas. However, with implementation new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. As discussed above, the proposed project would have no impact on mineral resources. As the proposed project would have no incremental contribution to the potential cumulative impact on mineral resources, project impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

12. Noise

Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation Incorporated. Noise is defined as unwanted sound. But not all unwanted sound rises to the level of a potentially significant environmental impact. To differentiate unwanted sound from potentially significant noise impacts, the City has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses resulting from construction and operation of the project. As discussed below, implementation of mitigation measures would ensure a less than significant impact with respect to construction noise.

Noise Principles and Descriptors

Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements. The most frequently used noise descriptors are summarized below:

L_{eq}: The L_{eq}, or equivalent sound level, is used to describe noise over a specified period of time in terms of a single numerical value; the L_{eq} of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The L_{eq} may also be referred to as the average sound level.

CNEL: Community Noise Equivalent Level (CNEL), is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dB to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Applicable Noise Regulations

Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.).

Section 91.1207.11.2 limits the interior noise levels to not exceed 45 dBA CNEL in any habitable room.

Section 91.1207.11.4 states that the locations where CNEL exceeds 60 dBA shall require an acoustical analysis showing that the proposed design will limit exterior noise to the prescribed allowable interior noise level.

Section 113.01 prohibits collecting or disposing of rubbish or garbage, to operate any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in Section 66.00 of LAMC, within 200 feet of any residential building between the hours of 9:00 P.M. and 6:00 A.M. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners.

Section 114.03 prohibits loading/unloading activities, including operation of dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building, between the hours of 10:00 p.m. and 7:00 a.m.

Section 112.02 prohibits operating any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than five (5) decibels.

Section 112.05 defines maximum noise level of powered equipment or powered hand tools. The noise level is limited to 75 dBA at 50 feet for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment, between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet. However, noise limitations shall not apply where compliance is technically infeasible, which means that noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment. Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of “offending” noise sources. To account for people’s increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise source occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise source occurring five minutes or less in any one-hour period between the hours of 7:00 a.m. and 10:00 p.m.

In addition to the previously described LAMC provisions, the City has also established noise guidelines that are used for planning purposes. These guidelines are set forth in the City of L.A. CEQA Thresholds Guide and based in part on the community noise compatibility guidelines established by the California State Governor’s Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels (OPR, 2003). **Table B-11, *Guidelines for Noise Compatible Land Use***, provides the guidelines of land use compatibility for community noise sources. The CNEL noise levels for specific land uses are classified into four categories: (1) “normally acceptable” (2) “conditionally acceptable” (3) “normally unacceptable” and (4) “clearly unacceptable.” A CNEL value of 70 dBA is considered the dividing line between a “conditionally acceptable” and “normally unacceptable” noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

**TABLE B-11
GUIDELINES FOR NOISE COMPATIBLE LAND USE**

Land Use	Community Noise Exposure CNEL (dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

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.

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.

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.

Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of L.A. CEQA Thresholds Guide, 2006.

With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases), with consideration of existing ambient noise conditions, and City's land use noise compatibility guidelines. The project would result in a significant noise impact if:

- Construction-related noise levels exceed 75 dBA at distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;
- Project on-site stationary sources (i.e., air conditioning units, pumps) increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA or more;
- Project-related off-site traffic increase ambient noise levels along roadway segments with sensitive receptors by 5 dBA (CNEL) or more and the resulting noise falls on a noise-

sensitive land use within an area categorized as either “normally acceptable” or “conditionally acceptable”; or cause ambient noise levels to increase by 3 dBA (CNEL) or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally unacceptable” or “clearly unacceptable”; or

- Project exterior noise levels exceed 65 dBA CNEL for on-site project multi-family uses.

Existing Conditions

The project site is located at 1201 North Broadway on an approximately 0.73-acre site within the northern end of the Central City North Community Plan Area. The project site is located just north of Downtown Los Angeles (the Central City area). Existing land uses around the project site include the following:

- North - Immediately north, within the same block as the project site and along the south side of Savoy Street, are two 2-story multi-family residences and a single-family residence. The single-family residence is owned by the applicant and is not occupied. Therefore, the single-family residence is not considered as a sensitive receptor. To the northwest is a two-story office/retail building and surface parking lot for the Li Hing of Hong Kong Inc. Oriental Arts and Crafts Importer commercial establishment. Further north, single-family residences line the north side of Savoy Street.
- East and South - Across North Broadway to the east is the Los Angeles State Historic Park, which was established in 2005 on an approximately 32-acre parcel formerly used as the Southern Pacific Railroad Company’s River Station railroad yard. The park is planned as a major open space amenity within the Community Plan Area and buildout is anticipated in 2017. The Gold Line right-of-way is located to the southeast of the project site, running parallel to North Broadway.
- West – Cathedral High School is located to the west, directly across Bishops Road.

To quantify the existing noise environment, long-term (24-hour) measurements were conducted at one location, identified as R1. Short-term (15-minute) measurements during daytime peak hours were recorded at Locations R2 through R4, as shown on **Figure B-1, Noise Measurement Locations**.

The ambient noise measurements were conducted using a Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. Measurement instruments were calibrated and operated according to manufacturer specifications. The microphone was placed at a height of 5 feet above the ground level, at the following locations as shown in Figure B-1.

- R1: represents the existing noise environment of Cathedral High School and residential uses along Savoy Street. The SLM was placed on the southeastern boundary of Bishops Road and Savoy Street.
- R2: represents the existing noise environment of the project site. The SLM was placed on the eastern corner of the project site along Broadway.

- **R3:** represents the existing noise environment of residential uses along Savoy Street. The SLM was placed at directly north of project site on Savoy Street between North Broadway and Bishops Road.
- **R4:** represents the existing noise environment of two 2-story multifamily residences and a single family residence adjacent north of the project site. The SLM was placed on northern boundary of the project site behind residences.

These locations provide a representative characterization of the existing noise conditions within the project vicinity. The results of the ambient noise measurement data are summarized in **Table B-12, Summary of Ambient Noise Measurements**. As shown in Table B-12, the measured L_{eq} ranged from 58 to 74 dBA during daytime and from 55 to 66 during nighttime.

TABLE B-12
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Location, Duration, Existing Land Uses and, Date of Measurements	Measured Ambient Noise Levels, ^a (dBA)			
	Daytime (7 A.M. to 10 P.M.) Hourly L_{eq}	Daytime Average Hourly L_{eq}	Nighttime (10 P.M. to 7 A.M.) Hourly L_{eq}	Nighttime Average Hourly L_{eq}
R1 12/13/16 (10:00 A.M. to 11:59 P.M.)/Tuesday 12/14/16 (12:00 A.M. to 9:59 A.M.)/ Wednesday	59 – 67	63	55 – 66	61
R2 12/13/16 (10:24 A.M. to 10:39 A.M.)/Tuesday	74	N/A	N/A	N/A
R3 12/13/16 (10:42 A.M. to 10:57 A.M.)/Tuesday	59	N/A	N/A	N/A
R4 12/13/16 (10:05 A.M. to 10:20 A.M.)/Tuesday	58	N/A	N/A	N/A

^a Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix I.

SOURCE: ESA PCR, 2016.

Construction Noise

Construction is anticipated to commence in early 2019 and be completed in 2021. The assessments include construction noise impacts to the noise sensitive receivers in the vicinity of the project site due to the operation of construction equipment (on-site construction activities) and due to haul truck activities (off-site construction activities).

On-Site Construction Activities

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, site preparation, excavation, foundation construction, and building construction. The noise levels created by construction equipment would vary depending on factors such as the type of equipment, the specific model, the operation

being performed and the condition of the equipment. Construction noise associated with the project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing based on construction equipment data provided by the applicant's contractor. **Table B-13, Construction Equipment and Estimated Noise Levels (L_{eq})**, presents the list of construction equipment and approximate quantities per construction phase with reference noise levels.

**TABLE B-13
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS (LEQ)**

Construction Equipment	Noise Level at 50 feet (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level at 50 feet (dBA)
Demolition				85
Backhoe	78	40	1	
Crawler Tractor	82	40	1	
Jackhammer	89	20	2	
Rubber Tired Loader	79	50	1	
Site Preparation/Grading/Excavation				84
Crawler Tractor	82	40	2	
Drill Rig Truck	79	20	1	
Compactor	83	20	1	
Excavator	81	40	1	
Rubber Tired Loader	79	50	1	
Generator Sets	81	50	1	
Roller	80	20	1	
Skid Steer Loaders	80	40	1	
Drainage/Utilities/Sub-Grade				85
Concrete Mixer Truck	79	40	1	
Excavator	81	40	1	
Pumps	81	50	1	
Rough Terrain Forklift	85	50	1	
Trencher	85	50	1	
Foundation/Concrete Pour				83
Air Compressor	78	50	5	
Concrete Mixer Truck	79	70	3	
Generator Set	81	50	1	
Pumps	81	50	1	
Rough Terrain Forklift	75	50	1	
Building Construction				82
Air Compressor	78	50	5	
Concrete Mixer Truck	79	40	1	
Crane	81	40	1	
Rough Terrain Forklift	75	50	1	

Construction Equipment	Noise Level at 50 feet (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level at 50 feet (dBA)
Paving/Architectural Coatings				80
Air Compressor	78	50	5	
Rough Terrain Forklift	75	50	1	
Skid Steer Loaders	80	40	1	

Note: Noise Levels at 50 ft and Usage Factor are derived from Federal Highway Administration's Roadway Construction Noise Model User's Guide.

SOURCE: ESA PCR, 2017.

These noise levels account for the project contractor(s) equipping construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. Also, the project would be required to comply with City of Los Angeles LAMC Sections 41.40 and 112.05, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. The estimated noise levels represent a conservative scenario because construction activities are analyzed as if some of them were occurring along the perimeter of the construction area, whereas construction would typically occur throughout the site, further from noise-sensitive receptors. Regardless of noise levels at noise sensitive receivers, because the project site is located within 500 feet of residential uses, the construction noise would be considered a potentially significant impact due to the exceedance of the 75 dBA standard at 50 feet. Therefore, Mitigation Measures NOISE-1 to NOISE-4 are prescribed for the project.

Implementation of Mitigation Measures NOISE-1 through NOISE-4, which would require the implementation of noise reduction devices and techniques during construction at the project site, would serve to reduce the noise levels associated with construction of the project to the maximum extent that is technically feasible. Mitigation Measure NOISE-4 would be expected to attenuate noise by a minimum of 10 dBA for sensitive receptors located on the ground level in which the direct line-of-sight from construction activities would be blocked. With implementation of these mitigation measures, the construction activities associated with the proposed project would comply with the noise regulations established in Sections 41.40 and 112.05 of the LAMC. Further, the project's construction activities, including delivery and haul routes, would be restricted to hours between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 5:00 P.M. on Saturday per LAMC requirements. No noise-generating construction activities would take place on Sundays and holidays (observed by the City). The project would comply with the City's Noise Ordinance and any subsequent ordinances which would prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Therefore, with respect to a violation of the noise standards and regulations established in the LAMC, potentially significant noise impacts during project construction would be reduced to a less than significant level with compliance to applicable regulatory requirements and implementation of the prescribed mitigation measures.

Mitigation Measures

MM NOISE-1: Noise-generating equipment operated at the project site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2: The applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the project site. Signs shall also be posted at the project site that includes permitted construction days and hours.

MM NOISE-3: Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously, a maximum of 3 pieces within 50 feet from residential uses.

MM NOISE-4: Temporary noise barriers shall be used to block the line-of-site between construction equipment and residences directly adjacent to the project site on the north at all times during project construction. Noise barriers shall be a minimum of 15-feet tall along the west and north boundaries and a minimum of 8-feet tall along the east boundary of the project site.

MM NOISE-4 would specifically ensure that construction noise levels at the residential uses directly adjacent to the project site on the north would be reduced to less than significant. It is not technically feasible to provide noise barriers of sufficient height to block the line-of-site between construction equipment and residences further to the north of the project site on the north side of Savoy Street and portions of Cathedral High School north of the project site due to the substantial elevation gain relative to the project site and because barriers higher than 15 feet would require substantial foundations and vertical supports that would interfere with necessary construction activity on the site. Although the noise barrier would not block the line-of-sight for the residential uses on the north side of Savoy Street and Cathedral High School north of the project site, these uses are located further away than the residential uses directly adjacent to the project site on the north and would experience lower noise levels as a result of distance attenuation (at least a 6 dBA reduction per doubling of distance). As the project would incorporate to the maximum extent technically feasible measures to reduce noise impacts, in accordance with City policy, construction noise impacts would be mitigated to a less-than-significant level. With implementation of Mitigation Measures NOISE-1 through NOISE-4, the potential construction noise impacts would be reduced to less than significant with the incorporation of the required mitigation.

Off-Site Construction Activities

During the phase of grading and excavation, there would be a maximum of 125 haul truck trips per day. It was assumed that these trucks would enter the project site from Broadway and exit the project site, heading northeast on North Broadway, left at Solano Avenue, and taking ramp onto CA-110 N. State Highway.

Detailed noise calculations for construction traffic are provided in Appendix I. The project's truck trips would generate noise levels of 55.8 dBA CNEL at 25 feet distance along Broadway and 56.5 dBA CNEL along Solano Avenue.

The existing noise levels along streets in the project vicinity are 68.2 dBA CNEL along Broadway, between Solano Avenue and Ave 18 and 63.6 dBA CNEL, along Solano Avenue, west of Broadway (see Table B-15, *Off-site Traffic Noise Impacts*, provided below under the Operational Noise analysis). Construction traffic noise levels generated by truck trips would increase traffic noise levels along Broadway by up to 0.2 dBA and along Solano Avenue by up to 0.8 dBA. The noise level increases by truck trips would be below the significance threshold of 5 dBA. Therefore, off-site construction traffic noise impacts would be less than significant.

Operational Noise

The existing noise environment in the project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would have a minimal effect on the noise environment in proximity to the project site. Noise generated by the project would result primarily from normal operation of the building mechanical equipment and off-site traffic.

Off-Site Traffic Noise

Vehicle trips attributed to operation of the project would increase traffic volumes along the major thoroughfares within the project vicinity. This increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from project development. The street segments chosen for this analysis have residential land uses which are the most affected by traffic increases generated by the project.

The Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5 was used to predict the noise level due to vehicular traffic. The TNM model run was validated by comparing the measured noise levels at R1 and R2 to predicted noise levels for the same traffic conditions observed during the measurements. **Table B-14, *Traffic Noise Model Validation Results***, presents the results of model validation.

TABLE B-14
TRAFFIC NOISE MODEL VALIDATION RESULTS

Measurement Location	Measured Noise Level (dBA)	Calculated Noise Level (dBA)	Net Difference
R1, Bishops Road	62.2	60.8	-1.4
R2, Broadway	74.0	72.4	-1.6

SOURCE: ESA PCR, 2017.

Caltrans *Technical Noise Supplement* guidance document states that the model is considered validated when the measured and calculated noise levels are within ± 3 dB (Caltrans, 2013). As Table B-12 indicates, the validation is within 3 dB and it is considered validated.

In order to increase traffic noise levels by 3 dBA, the traffic volumes with the project would need to be doubled from Existing to Future with Project (FTA, 2006). **Table B-15, Off-site Traffic Noise Impacts**, includes the traffic volumes in the vicinity of the project site for existing and Future with Project and the associated increase in noise levels. It is assumed that the traffic mix and speed limit would remain similar for Existing and Future with Project conditions. Based on the logarithmic comparison of traffic volumes, no roadway segment would experience greater than a 1.5 dBA increase in traffic noise level. As shown in Table B-15, the maximum traffic noise increase would be 1.5 dBA along Cesar Chavez Avenue, west of Grand Avenue. All other modeled roadway segments would result in traffic noise increases of less than 1.5 dBA. Therefore, the noise level on local roadways due to the project's off-site traffic would not exceed the 3 dBA threshold and impacts would be less than significant.

TABLE B-15
OFF-SITE TRAFFIC NOISE IMPACTS

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway CNEL (dBA)				
	Existing	Future No Project	Future with Project	Project Increment	Cumulative Increment
N. Broadway					
Between Cesar Chavez Avenue and Alpine Street	69.6	70.6	70.6	0.0	1.0
Between Alpine Street and College Street	69.9	70.4	70.4	0.0	0.5
Between College Street and Bernard Street	70.7	71.1	71.1	0.0	0.4
Between Bernard Street and Bishops Road	70.1	70.4	70.5	0.1	0.4
Between Bishops Road and Solano Avenue	70.9	71.1	71.2	0.1	0.3
Between Solano Avenue and Ave 18	68.2	68.5	68.5	0.0	0.3
Hill Street					
South of Alpine Street	70.1	70.4	70.4	0.0	0.3
Between Alpine Street and College Street	70.8	71.1	71.1	0.0	0.3
North of College Street	71.5	71.9	71.9	0.0	0.4
Bishop Road					
West of Broadway	64.6	64.9	65.0	0.1	0.4
College Street					
West of Hill Street	64.5	65.0	65.0	0.0	0.5
Between Hill Street and Broadway	65.2	65.8	65.8	0.0	0.6
East of Broadway	66.1	66.7	66.7	0.0	0.6
Alpine Street					
West of Hill Street	63.6	64.1	64.1	0.0	0.5

Calculated Traffic Noise Levels at 25 feet from Roadway CNEL (dBA)					
Roadway Segment	Existing	Future No Project	Future with Project	Project Increment	Cumulative Increment
Between Hill Street and Broadway	64.6	65.0	65.0	0.0	0.4
East of Broadway	66.0	66.5	66.5	0.0	0.5
Cesar Chavez Avenue					
West of Grand Avenue	69.7	71.2	71.2	0.0	1.5
Between Grand Avenue and Broadway	70.5	71.3	71.3	0.0	0.8
East of Broadway	69.8	71.0	71.0	0.0	1.2
Solano Avenue					
West of Broadway	63.6	63.9	63.9	0.0	0.3

^a Based on noise levels at 25 feet distance from the roadway and residential uses if residential uses are shown along roadways. Traffic noise level calculations were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the project's incremental contribution to traffic noise levels over existing and cumulative conditions would be similar to or slightly less than shown in this table.

SOURCE: ESA PCR, 2017.

On-Site Operational Noise

The operation of mechanical equipment typical for developments like the project, such as air conditioners, fans, generators, and related equipment may generate audible noise levels. Mechanical equipment is typically located on rooftops or within buildings, and is shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls to comply with noise limitation requirements provided in Section 112.02 of the LAMC, which limits the noise from such equipment causing an increase in the ambient noise level by more than five decibels. Therefore, operation of mechanical equipment would not exceed the City's thresholds of significance and impacts would be less than significant.

A loading dock and refuse service areas would be located on the ground level of the building with accesses from North Broadway. The loading dock and refuse service areas would be located within an enclosed area of the building at the ground level. While the loading dock and refuse service areas would generate noise from activities such as truck movements and idling along with general loading/unloading and refuse service related operations, the location of this area within an enclosed area of the building would shield the adjacent off-site sensitive uses from this noise source. Thus, given the design of the loading dock and refuse service areas within the building, noise levels generated from this area would not increase the ambient noise levels at off-site sensitive receptor locations. As such, impacts would be less than significant.

The project includes a common deck area with amenities including, a pool deck, seating garden, outdoor kitchen, dining terrace, fire pit, cabanas, and spa located on Level 2 of the proposed building. The pool deck on Level 2 would be located approximately 14 feet above ground. The nearest residential uses (R4) would be located approximately 27 lateral feet from the common

deck area. Therefore, the common deck area would be located approximately 30 feet from the nearest residential uses (R4).

Under a conservative scenario, it is estimated that up to approximately 100 visitors could be in attendance on the common deck area at one time on a peak weekend day. Noise from human conversation is approximately 55 dBA at a distance of 3 feet. Assuming 50 visitors talking simultaneously, the continuous noise level would be up to 72 dBA at 3 feet. The nearest noise sensitive receptors north of the project site would be located approximately 30 feet from the common deck. Based on a noise level source strength of 72 dBA at a reference distance of 3 feet, and accounting for distance attenuation (20 dBA) and barrier insertion loss by parapet walls and the project building (minimum 5 dBA insertion loss), the common deck noise would be reduced to 47 dBA at the noise sensitive receptors (R4) and would not exceed the significance threshold of 63 dBA (58 dBA measured during the daytime at R4 plus 5 dBA). Therefore, the common deck operations would not result in a substantial increase in ambient noise levels, and impacts would be less than significant.

Based on the above, operational noise impacts would be less than significant.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The project would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not cause excessive groundborne vibration. Post-construction on-site activities would be limited to residential and commercial uses that would not generate excessive groundborne vibration.

Vibration Principles and Descriptors

As described in the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment (FTA, 2006), ground-borne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. In contrast to airborne noise, ground-borne vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of ground-borne vibration are trains, buses on rough roads, and construction activities such as blasting, pile-driving, and operation of heavy earth-moving equipment.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration sensitive equipment.

The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme

cases, the vibration can cause damage to buildings. Building damage is not a factor for most projects, with the occasional exception of blasting and pile-driving during construction. Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception by only a small margin. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. The Caltrans measure of the threshold of structure damage for residential uses is 0.5 in/sec PPV. In addition, the guidance also sets 0.035 PPV as the threshold for “Distinctly Perceptible” human response to steady state vibration (Caltrans, 2004).

The project would result in a significant noise impact if:

- Project construction activities cause ground-borne vibration levels to exceed 0.5 inch-per-second PPV at the nearest residential buildings.
- Project construction activities cause ground-borne vibration levels to exceed 0.035 inch-per-second PPV at the nearest residential buildings.

Construction Vibration

Vibration impacts due to the construction activities would occur when a large machine would be operated near residential structures. The FTA document includes vibration source levels for typical construction equipment. It should be noted that there would be no pile driving, jackhammering, or blasting during construction of the project. **Table B-16, *Vibration Source Levels for Typical Construction Equipment***, presents typical construction equipment with vibration source levels.

TABLE B-16
VIBRATION SOURCE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate RMS (VdB) at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

SOURCE: FTA, 2006.

Vibration sensitive structures in the vicinity of the project site would be multi-family residential uses north of the project site. The multi-family residential building is located approximately 10 feet north of the project site. The multi-family residential building would be exposed to vibration levels up to 0.35 in/sec PPV, which is below the 0.5 in/sec PPV threshold for residential structure damage. As such, impacts would be less than significant. No mitigation measures would be required.

With respect with human perception, as discussed above, the nearest off-site multi-family residential uses would be exposed to vibration velocities up to 0.35 inches per second PPV. As this value exceeds the 0.035 inches per second PPV perception threshold, vibration impacts

during excavation phase would be potentially significant without implementation of mitigation measures.

Mitigation Measure

MM NOISE-5: Heavy equipment shall not be used within 50 feet of the neighboring residential structures. Heavy equipment is defined as equipment with an engine size of 600 horsepower or greater and includes large dozers, large excavators, and large loaders. If such proximate construction is required, alternative equipment and methods such as small bulldozers with an engine size of less than 300 horsepower shall be used to ensure that vibration effects on adjacent residential uses do not exceed vibration velocities of 0.035 inches per second.

With the preparation and implementation of Mitigation Measure NOISE-5, the potential construction vibration impacts would be reduced to less than significant with the incorporation of the required mitigation.

Operational Vibration

Once construction activities have been completed, there would be no substantial sources of vibration activities from the project site. The project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce limited levels of vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area, which also produce limited levels of vibration. These sources would generate substantially lower levels of vibration identified above for construction. Therefore, vibration impacts during project operation would be less than significant.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The existing noise environment in the project area is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would not have a significant effect on the community noise environment in proximity to the project site. Noise sources that would have potential noise impacts include: off-site vehicle traffic and mechanical (i.e., air-conditioning) equipment. Motor vehicle travel on local roadways attributable to the project, as discussed in Response No. 12.a, would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., mechanical equipment) are also considered less than significant as discussed in Response No. 12.a. As such, noise impacts would be less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. The project would result in a temporary increase in ambient noise near the project site during the construction period. Construction noise impacts are discussed in Response No. 12.a. Noise generated by on-site

construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed mitigation measures.

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. The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

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

No Impact. The project site is not located within the vicinity of a private airstrip, or heliport or helistop. Therefore, the project would not expose people residing or working in the project area to excessive noise levels from such uses. No impact would occur in this regard.

Cumulative Impacts

Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate Project area likely would contribute to cumulative noise impacts.

Construction Noise

Noise from construction of the project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There are no related projects in the surrounding area within approximately 500 feet of the project. The nearest related project is the College Station Mixed-Use Project at 129 West College Street, which is approximately 1,150 feet from the project site. All other related projects are also greater than 1,150 feet from the project site and would not contribute substantially to cumulative construction noise impacts. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the project. As there are no related projects within 500 feet of the project site, cumulative impacts associated with construction noise would be less than significant.

Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the project and other projects in the project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the project to the future cumulative base traffic volumes in the project vicinity. The noise levels associated with cumulative base traffic volumes with the project are identified above in Table B-13. Noise level increases in the project vicinity would reach a maximum of 1.5 dBA CNEL along Cesar Chavez Avenue, west of Grand Avenue, which would not exceed the 3 dBA significance threshold.

Therefore, with respect to roadway noise, the project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Due to Section 112.02 of the LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. As discussed previously, the loading dock and refuse service areas would be located on the ground level of the building within an enclosed area and would not increase the ambient noise levels at off-site sensitive receptor locations. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to project-related noise levels. As the project's composite stationary-source impacts would be less than significant, its contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Noise associated with the common deck area, conservatively assuming that up to approximately 100 visitors could be in attendance on the common deck area at one time on a peak weekend day, would generate a noise level of approximately 52 dBA at the noise sensitive receptors (R4), accounting for distance attenuation (15 dBA) and barrier insertion loss by parapet walls and the project building (minimum 5 dBA insertion loss). When added to the measure existing noise level of 58 dBA, the combined noise level would be approximately 59 dBA – an increase of only approximately 1 dBA, which would not be a cumulatively considerable contribution to ambient noise. Distance attenuation of noise from related projects, the nearest of which would be the College Station Mixed-Use Project at 129 West College Street approximately 1,150 feet from the project site, would ensure cumulative noise would be less than significant.

Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project site, the project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

13. Population and Housing

Would the project:

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

Less Than Significant Impact. The proposed project would provide infill development within a currently developed urban area. The proposed project would not add new infrastructure beyond that required to connect to the proposed project to existing utility lines and adjacent roadways. Thus, the proposed project would not open new areas to development, or promote development in an area not otherwise expected to be developed.

Population growth and future development projections are prepared by SCAG, which provides current and projected population, housing and employment estimates for the region as a component of the RTP/SCS. SCAG bases its estimates, in part, on anticipated development by

City jurisdictions based on their General Plans, Zoning and on-going development activity. The SCAG projections serve as the basis for providing infrastructure and public services by various jurisdictions and service agencies throughout the region. The 2016–2040 RTP/SCS reports demographic data for 2012, 2020, 2035 and 2040. The 2020, 2035, and 2040 projections apply the SCAG growth assumptions to the 2012 baselines as reported in the 2016 RTP.¹¹ The 2016 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies. An estimate of the 2016 baseline population and growth projections for 2021 (Buildout Year) and 2040 are shown in **Table B-17, *Projected Population, Housing and Employment Estimates***.¹² As shown in Table B-17, the Central City North Community Plan Area and City of Los Angeles are projected to have population, housing and employment increases at the time of project buildout (2021) and SCAG’s Horizon Year (2040) compared to interpolated 2016 baseline conditions.

TABLE B-17
PROJECTED POPULATION, HOUSING AND EMPLOYMENT ESTIMATES

	2016 Baseline	Project Buildout Year – 2021		SCAG Projection Horizon - 2040			
		Projected	Total Growth	Percentage Increase	Projected	Total Growth	Percentage Increase
Population							
Central City North Community Plan Area	24,580	26,708	2,128	8.7%	44,601	20,021	81.5%
City of Los Angeles	3,931,227	4,046,599	115,372	2.9%	4,609,414	678,187	17.3%
Housing							
Central City North Community Plan Area	6,917	7,919	1,002	14.5%	15,433	8,516	123.1%
City of Los Angeles	1,383,467	1,453,849	70,382	5.1%	1,690,343	306,876	22.2%
Employment							
Central City North Community Plan Area	26,256	29,084	2,828	10.8%	35,181	8,925	34.0%
City of Los Angeles	1,797,971	1,913,018	115,047	6.4%	2,169,114	371,143	20.6%

SOURCE: Based on SCAG data prepared for the 2016 – 2040 RTP/SCS. Data was requested and received from the City of Los Angeles. The 2016 baseline estimate was determined by interpolating from data received. Compiled by ESA PCR, 2016.

The project’s contribution to employment opportunities is summarized in **Table B-18, *Project Increases in Population, Housing, and Employment***. The project would replace the existing office building and associated surface parking lot with a new mixed-use residential building. This would result in a reduced employment population at the project site and an increase in resident population and housing units. The proposed project would provide 118 residential units, 8,795 sf of ground floor commercial/retail uses, and 17,457 sf of usable common public and private open

11 SCAG provides population, housing, and employment estimates forecasted for 2020, 2035, and 2040 for regional, county, and city/jurisdictional geographies. Data is available on a request basis and was provided to ESA PCR.

12 The 2016 baseline estimate was determined by interpolating from data presented in the SCAG projections.

space and recreational areas. The projected project increase in population, housing, and employment is compared to growth projections in the SCAG 2016 RTP/SCS for the Central City North Community Plan Area and the City of Los Angeles in **Table B-19, Project Population, Housing, and Employment Impacts.**

TABLE B-18
PROJECT INCREASES IN POPULATION, HOUSING, AND EMPLOYMENT

Housing Units and Population			
Total Housing Units		Average Household Size ^a	Total Population
118		3.6	425
Employees			
Use	Amount	Employment Generation Factor (per sq.ft.) ^b	Number of Employees
Commercial/Office (sq.ft.) ^b	8,795	0.00479	42

^a The average household size reflects the average household size for the Central City North Community Plan Area, based on the 2010 Census data.

^b The employee generation factors for the listed uses are taken from the Los Angeles Unified School District, 2014 Developer Fee Justification Study, March 2014. The rate for standard commercial office, rather than the office employment generation factor, was used to provide a more conservative estimation of the number of employees generated.

SOURCE: ESA PCR, 2017.

Construction of the project would require the participation of construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences within this region or move from other regions as a result of their work on the project. As the project would draw on an existing labor pool, the construction impacts of the project on the number of employees in the region would be negligible. Given the temporary nature of the construction activity, the mobility of construction workers, and availability of a labor pool to draw on, construction workers would not be expected to have notable impact on the demand for housing, nor affect general housing occupancy and population patterns. As seen in Table B-18, the project will result in 42 new employees. While the project would not directly result in population growth due to future employees moving into the area, new housing projects in Downtown Los Angeles and the Central City North Community Plan Area would be capable of accommodating any future employees.

TABLE B-19
PROJECT POPULATION, HOUSING, AND EMPLOYMENT IMPACTS

	Project Increase ^a	SCAG Projected Growth ^b	Project Percentage of Growth
Population			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	425	2,128	20.0%
City of Los Angeles	425	115,372	0.4%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	425	20,021	2.1%
City of Los Angeles	425	678,187	0.1%
Households			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	118	1,002	11.8%
City of Los Angeles	118	70,382	0.2%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	118	8,516	1.4%
City of Los Angeles	118	306,876	0.04%
Employment			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	42	2,828	1.5%
City of Los Angeles	42	115,047	0.04%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	42	8,925	0.5%
City of Los Angeles	42	371,143	0.01%

^a From Table B-18.

^b From Table B-17.

SOURCE: ESA PCR, 2017. Based on SCAG 2016 RTP/SCS projections.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact (b-c). The project site is currently occupied by a single-story office building. No dwelling units are currently located on the project site. Thus, the project would not result in the demolition of existing housing units. The project would replace the existing single-story office building with a mixed-use residential building consisting of 118 residential units, 8,795 sf of ground floor commercial/retail uses, and 17,457 sf of usable common public and private open space and recreational areas. Since no existing housing would be displaced, there would be no necessity for the construction of replacement housing elsewhere. No mitigation measures are required.

Cumulative Impacts

Population and Housing

The cumulative impact analysis addresses the impacts of known and anticipated development in the project vicinity in combination with the proposed project, with respect to the anticipated amount and distribution of population, housing and employment. The 81 related projects are listed in **Table B-35, Related Projects**, of this IS/MND and in Table 6 of the Traffic Study, provided in Appendix L of this IS/MND. **Table B-20, Cumulative Increases in Population, Housing, and Employment**, below show the total population, housing, and employment increases from the related projects in the project vicinity. Based on all of the uses, there will be a cumulative increase of 53,518 residents, 14,866 housing units, and 14,187 employees in the project vicinity.

TABLE B-20
CUMULATIVE INCREASES IN POPULATION, HOUSING, AND EMPLOYMENT

Housing Units and Population			
Total Housing Units		Average Household Size^a	Total Population^b
14,866		3.6	53,518
Total			53,518
Employees			
Use	Amount	Employment Generation Factor (per sf)^c	Number of Employees^b
Retail/Restaurant (sf) ^d	1,503,000	0.00271	4,073
Office (sf) ^e	1,406,000	0.00479	6,735
Research and Development (sf)	465,000	0.00304	1,414
Hotel (sf) ^f	494,000	0.00113	558
School (students) ^g	1,942	0.0833	162
Others (sf) ^h	922,000	0.00135	1,245
Total			14,187

^a The average household size reflects the average household size for the Central City North Community Plan Area, based on the 2010 Census data.

^b This estimate is more conservative than the total population and employees that are reflected in the Table J-1, Estimate of New Population and Housing from Related Projects, included in Appendix J of this IS. Table J-1 in Appendix J was rounded to each full figure which represents a smaller total population and employees generated.

^c The employee generation factors for the listed uses are taken from the Los Angeles Unified School District, 2014 Developer Fee Justification Study, March 2014.

^d As a separate rate is not provided for restaurant uses, the retail factor (Neighborhood Shopping Centers) was used. The amount includes the all retail, restaurant, grocery stores, and bars.

^e The rate for standard commercial office was used for the offices, general offices, and medical offices. Related Project #57 (USC Health Science Campus) contains a Research and Development component that uses the Scientific Research & Development employment generation factor.

^f Hotel rooms are assumed to be approximately 500 square feet. As a separate use for hotels is not provided, the rate for lodging was used for hotel rooms.

^g It is assumed that each student will require approximately 250 square feet. Approximately 1 employee is needed for every 12 students, which would result in an employee generation rate of 0.0833 employees per student.

^h The Bus Maintenance & Inspection Facility, Industrial Project, Museums, and projects marked as "Others" in the Related Projects Table use the Industrial Parks generation rate.

SOURCE: ESA PCR, 2016.

Out of the 81 related projects, 24 are located within the Central City North Community Plan Area. The calculation of the cumulative number of housing units, population, and employees is

provided in Appendix J, Population, Housing, and Employment Projection Documentation, of this IS/MND. A summary of the total cumulative growth, which is a combination of the related projects and the proposed project, is shown in **Table B-21, Total Cumulative Development**. As indicated therein, within the Central City North Community Plan Area, the project would contribute to the increase in population, housing, and employment for cumulative projects. The project plus related projects would create a total of 3,710 housing units and generate 13,357 new residents and 3,183 new employees. The total cumulative development inclusive of cumulative projects within and outside of the Community Plan Area is 14,990 housing units with a population of 53,965 people and 14,229 employees.

**TABLE B-21
TOTAL CUMULATIVE DEVELOPMENT**

Development	Housing Units^b	Population^b	Employment^c
Central City North Community Plan Area			
Cumulative Projects ^a	3,586	12,910	3,141
Proposed Project - Total Build-out	118	425	42
Total Plan Area and Project Cumulative Growth	3,704	13,335	3,183
All Cumulative Projects			
Cumulative Projects ^a	14,866	53,518	14,187
Proposed Project - Total Build-out	118	425	42
Total Cumulative Growth	14,984	53,943	14,229

^a A list of the Cumulative Projects is provided in Table B-35 of this IS/MND and in Table 6 of the Traffic Study, provided in Appendix L of this IS/MND.

^b The tabulation of related project housing units and calculation of associated population is presented in Appendix J, Table J-1 of this IS/MND.

^c The tabulation of employment generation for the related projects is presented in Appendix J, Table J-2 of this IS/MND.

SOURCE: ESA PCR, 2017.

Table B-22, Cumulative Population, Housing, and Employment Impacts, compares projected cumulative growth inclusive of the project to the 2021 buildout year and 2040 horizon year projections in the 2016 RTP/SCS. The cumulative projects include a broad array of development that is primarily residential, office and mixed retail in nature. It also includes other miscellaneous uses including schools, hotels, industrial developments, and a research and development facility.

TABLE B-22
CUMULATIVE POPULATION, HOUSING, AND EMPLOYMENT IMPACTS

	Cumulative Increase including Proposed Project^a	SCAG Projected Growth^b	Cumulative Percentage of Growth
Population			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	13,335	2,128	626.7%
City of Los Angeles	53,943	115,372	46.8%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	13,335	20,021	66.6%
City of Los Angeles	53,943	678,187	8.0%
Housing			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	3,704	1,002	369.3%
City of Los Angeles	14,984	70,382	21.3%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	3,704	8,516	43.5%
City of Los Angeles	14,984	306,876	4.9%
Employment			
<u>2016 - 2021 Buildout</u>			
Central City North Community Plan Area	3,183	2,828	112.5%
City of Los Angeles	14,229	115,047	12.4%
<u>2016 - 2040 Projection Horizon</u>			
Central City North Community Plan Area	3,183	8,925	35.7%
City of Los Angeles	14,229	371,143	3.8%

^a From Table B-21.

^b From Table B-19.

SOURCE: ESA PCR, 2017. Based on SCAG 2016 RTP/SCS projections.

As seen in Table B-22, the 2016 to 2021 buildout years for the Central City North Community Plan Area all have cumulative increases including the proposed project that are larger than the SCAG Projected Growth. Because many of the housing units being built are multi-family residences, it is also likely that not all of the households would have the capacity for 3.6 people per unit. It is also likely that many of the related projects will not be completed by the same 2021 buildout year as the proposed project, so the cumulative percentage of growth will be more exaggerated. A clearer picture of the cumulative growth in the Central City North Community Plan Area and the City of Los Angeles for the buildout of all projects is reflected in the 2040 projection horizon estimates. The cumulative growth therein attributed to the related projects would be consistent with the projected growth estimates from the SCAG 2016 RTP/SCS. The project's incremental contribution for population to cumulative impacts is not cumulatively considerable, and as such, cumulative impacts would be less than significant. Because the

estimates for housing and employment are within the projects, the project will not have a cumulative impact on housing and employment.

14. Public Services

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

a. Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services for the project site are provided by the City of Los Angeles Fire Department (LAFD). The LAFD's approximately 3,246 uniformed fire personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community services (LAFD, 2016). A total of 1,018 uniformed firefighters, including 270 serving as Firefighter/Paramedics, are always on duty at fire department facilities citywide, including 106 neighborhood fire stations strategically located across the LAFD's 471-mile jurisdiction. The nearest LAFD fire station to the project site is Fire Station 1, located at 2230 Pasadena Avenue, approximately 1.0 mile to the northeast, and would be the first responder (LAFD, 2016). LAFD fire stations within the proximity of the project site include Fire Station 3, and Fire Station 4. **Table B-23**, LAFD Fire Stations Located in the Vicinity of the Proposed Project Site, provides information on the location, type of equipment, and the approximate distance/direction from the project site. Staffing at each station is dependent on the number and type of fire apparatus at the station.

TABLE B-23
LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROPOSED PROJECT SITE

Fire Station	Address	Apparatus Equipment	Approximate Distance/Direction from proposed project Site	Average Response Time ^a
Fire Station 1	2230 Pasadena Avenue	Task Force Engine, Task Force Truck, Basic Life Support Rescue	1.0 mile northeast	4 minutes and 53 seconds
Fire Station 3	108 N. Fremont Avenue	Task Force Engine, Task Force Truck, Company Paramedic Rescue, Ambulance-Division Headquarters	1.34 miles southwest	4 minutes and 7 seconds
Fire Station 4	450 E. Temple Street	Task Force Engine, Task Force Truck, Company Paramedic Rescue	1.37 miles south	4 minutes and 10 seconds

^a LAFD, Response Metrics for 2016, <http://www.lafd.org/flsa/stations-map?st=316&year=2016>, accessed December 12, 2016.

SOURCE: ESA PCR, 2016.

Construction activities associated with the proposed project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources, including machinery and equipment sparking, exposed electrical lines, welding activities and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the project site. As applicable, construction activities would be required to comply with the 2013 CBC, the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response times for emergency vehicles to local businesses and/or residences within the project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be less than significant on a temporary and on an intermittent basis. To ensure impacts are minimized to the extent feasible, a Construction Management Plan (PDF TRAF-1) would be prepared for the proposed project, which is consistent with standard City requirements. The Plan would be prepared to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Los Angeles Department of Public Works prior to construction activities. The Construction Management Plan would be prepared for review and approval by the City of Los Angeles Department of Public Works prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during project construction.

Overall, with compliance to applicable LAFD requirements, including implementation of the proposed project's Construction Traffic Management Plan, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant.

Operational activities associated with the proposed project would increase the demand for fire protection and emergency medical services. The proposed project would increase the population on site by approximately 425 new residents. The estimated 425 persons increase in Los Angeles' population would represent a nominal 0.011 percent increase in the City's existing population (3,931,227 persons).¹³ Because the proposed project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQT, the population growth

¹³ Based on SCAG data prepared for the 2016 – 2040 RTP/SCS. Data was requested and received from the City of Los Angeles. The 2016 baseline estimate was determined by interpolating from data received. Compiled by ESA PCR, 2017.

generated by the proposed project is considered consistent with the City's and SCAG's growth policies.

The proposed project would be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, and LAMC, and the LAFD, to ensure adequate fire protection. Key components of these regulatory requirements that would implement as part of the proposed project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements.
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary, as well as a fire alarm system, building emergency communication system and smoke control system.
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g., floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- **LAFD Access:** Access for LAFD apparatus and personnel to the proposed project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. Emergency vehicles and fire access to the project site and surrounding area would be provided via garage access located along North Broadway.

The City of Los Angeles standard mitigation requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinkler and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD.

The project site is located within a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone (VHFHSZ) as determined by CALFIRE (City of Los Angeles, 2016). Elysian Park and Radio Hill Gardens are located approximately 0.65 mile and 0.25 mile north of the project site, respectively. However, the proposed project would include fire safety features, including the installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation, if necessary. Further, LAFD Station 1 would be considered the first responder for the project site, and would ensure fire protection services in the event of a fire.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy,

and the degree of fire hazards. The ability of the water service provider to provide water supply to the project site is discussed in Section 17, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the project site, including minimum fire flow requirements.

As described above, up to three LAFD fire stations would provide fire protection and emergency medical services to the project area and are dispatched based on availability and the nearest unit to a service call. Further, the project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. A number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternative routes, and multiple station response. The project vicinity is well served by several nearby fire stations within proximity to one-another and the project site. According to the General Plan Framework Element, the City distance standard for EMS services is one and one half miles. As shown in Table B-23, the nearest LAFD Station is 1.0 mile from the project site which is less than the standard, and readily accessible. The average response time for Station 1 is 4 minutes and 53 seconds. Further, fire stations have access to multiple routes to attend emergency calls. Further, as discussed in Section 16, *Transportation and Circulation*, operational traffic impacts to the local roadway network would be less than significant.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has taken a number of steps to improve their related systems, processes and practices. Upgrades include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. Based on the ability of LAFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the project vicinity and the multiple steps being taken by the LAFD to improve response times, project impacts on fire protection, services, and response times are considered less than significant.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access, construction measures, and plot plan review), along with the fact that LAFD has no known or proposed plans to expand their facilities serving the project site, the project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the proposed project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size.

Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the proposed project is required to mitigate.

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant.

b. Police protection?

Less Than Significant Impact. Police protection for the project site is provided by the Los Angeles Police Department (LAPD). The LAPD consists of approximately 10,354 sworn officers and 3,640 civilian employees (LAPD, 2016). The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The project site is located in the Central Bureau of the LAPD, which covers approximately 65 square miles with a population of approximately 900,000 people (LAPD, 2016). The Central Bureau oversees operations in the communities of the downtown business district, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium and Griffith Park. The Central Bureau oversees six community police stations: the Central Community Police Station, Hollenbeck Community Police Station, Newtown Community Police Station, Northeast Community Police Station, Rampart Community Police Station, and the Central Traffic Division (LAPD, 2016). The nearest Central Bureau police stations to the project site are the Hollenbeck Community Police Station located at 2111 East 1st Street, approximately 1.32 miles southwest, Rampart Community Police Station located at 1401 West 6th Street, approximately 2.14 miles southwest, and the Central Community Police Station, located at 251 East 6th Street, approximately 2.2 miles southwest of the project site. According to the LAPD correspondence on February 9, 2017, provided as Appendix K-1 in this MND, the proposed project would be under the jurisdiction of the Central Community Police Station, and is staffed by approximately 370 sworn personnel and 30 civilian staff. The officer to resident ratio is one officer to 108 residents in the Central Area. Additionally, there are special service teams available within the LAPD to service Central Area (LAPD, 2017). Central Station's emergency response system is directly linked to the LAPD Communications Division Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received, including 911 emergency calls (police, fire, and paramedic). Communications Division handles only police related calls for the City. The average response time to emergency calls for service in Central Area during 2016 was 2.7 minutes. The average response time for non-emergency calls for service in Central Area during 2016 was 13.7 minutes (LAPD, 2017).

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the project site is located in an area with high vehicular activity from North Broadway. Additionally, the construction site would be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the project site would be maintained. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Construction Management Plan (PDF TRAF-1) for the proposed project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Given the visibility of the project site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing, the proposed project's construction activities are not expected to increase demand on existing police services to a meaningful extent. Therefore, the proposed project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the proposed project would increase demand for police protection services. The estimated 425 person increase in the City of Los Angeles' population would represent a nominal 0.011 percent increase in the City's population of 3,971,883 persons.¹⁴ There are 75 existing employees working at the project site. As the proposed project would replace the existing office building, it would reduce the total employees, and thus, result in an indirect population decrease associated with employment. Because the proposed project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQT, the population growth generated by the proposed project is considered consistent with the City's and SCAG's growth policies. The proposed project would be designed in consideration of the City's "Design Out Crime" initiative to provide a proposed project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED). As discussed in Attachment A, *Proposed Project Description*, the proposed project would incorporate a security program to ensure the safety of residents and site visitors. Access to the parking structure would be controlled through a kiosk with a gated entry, and the structure would be well illuminated. Proposed project site security would include controlled keycard access to residential areas, secured entry and exit points to all buildings, security fencing, and security lighting within common areas and entryways, as well as security patrols. Duties of the security patrols would include, but not be limited to: assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling multiple portions of the property, such as residential corridors, exterior perimeter, the parking garage, and amenity and common areas.

¹⁴ Based on SCAG data prepared for the 2016 – 2040 RTP/SCS. Data was requested and received from the City of Los Angeles. The 2016 baseline estimate was determined by interpolating from data received. Compiled by ESA PCR, 2017.

The LAPD apportions each Community Police Station into roughly eight to ten Basic Car areas, with one patrol car permanently assigned to each. Three teams of officers are assigned to patrol each neighborhood on a 24-hour basis (three eight-hour shifts). These officers provide neighborhood patrol to prevent crime and answering radio calls for service. Additional patrol units may be assigned during periods of increased workload (LAPD, 2016). Response times are a function of patrol car location and calls occurring at a particular time. As identified in Section 16, Transportation and Circulation, operational traffic impacts would be less than significant. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the project site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the project site. Finally, the proposed project would provide adequate access for emergency vehicles to the project site subject to the approval of the LAPD. Accordingly, impacts associated with emergency response times and emergency access are considered less than significant.

Overall, given the incremental change to the population served by the Central Bureau created by the proposed project, the project's planned on-site security measures, and that LAPD has no known or proposed plans to expand their police facilities serving the project area, the proposed project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the proposed project such that it would require construction of new police facilities. Even if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the project area is highly developed, and the site of a police station or expansion of a police station would likely be on an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the proposed project would not create the need for additional police protection services as part of an unplanned police station.

Based on the above, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of police facilities are considered less than significant.

c. Schools?

Less Than Significant Impact. The proposed project would be served by the Los Angeles Unified School District (LAUSD). The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 31 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education

to a total of 664,774 students with a total enrollment of 734,641 students when including adult education, enrolled throughout 1,302 schools and centers, including: 19 primary school centers, 451 elementary schools, 83 middle schools, 96 senior high schools, 54 option schools, 44 magnet schools, 24 multi-level schools, 12 special education schools, two home/hospitals, 169 K-12 magnet centers (on regular campuses), 228 charter schools, and 120 three other schools and centers (LAUSD, 2016).

LAUSD is currently divided into six local districts (Central, East, Northeast, Northwest, South, West), with the proposed project site being located in the Local District Central (LAUSD, 2015). The project site is located within the designated resident school area of Solano Avenue Elementary School, Florence Nightingale Middle School, Abraham Lincoln Senior High School, and Woodrow Wilson Senior High School. These four schools are currently under capacity and are not expected to be over capacity within LAUSD's five-year planning period. According to LAUSD correspondence on February 1, 2017, provided as Appendix K-2 in this MND, in the 2015 to 2016 school year, Solano Avenue Elementary School had 132 Kindergarten through 5th Grade students enrolled, with a capacity for 266 students (LAUSD, 2017). Similarly, in the 2015 to 2016 school year, Florence Nightingale Middle School had 495 6th Grade through 8th Grade students enrolled, with a capacity for 863 students (LAUSD, 2017). In the same time period, Abraham Lincoln Senior High School had 825 9th Grade through 12th Grade students enrolled, with a capacity for 1,507 students, and Woodrow Wilson High School had 1,203 9th Grade through 12th Grade students enrolled, with a capacity for 2,382 students (LAUSD, 2017)

Construction of the proposed project would require construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocated residences within this region or move from other regions as a result of their work on the proposed project. Therefore, project construction would not generate a significant amount of new students needing to attend local schools.

Project operation would incrementally increase demand for school services. The estimated 425 person increase in the City of Los Angeles' population would represent a nominal 0.011 percent increase in the City's existing population of the estimated 2016 population of 3,931,227 persons. Because the proposed project would replace existing office uses, it would reduce total employees and, thus, result in an indirect population decrease associated with employment. If new employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some new employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be negligible change in student population in the nearby schools.

Using LAUSD student generation rates, the proposed project is estimated to generate 20 elementary school students, six middle school students, and four high school students for a total of 30 students.¹⁵ This number is conservative in that it assumes that none of the future proposed project residents with families would already have students attending the affected schools. Furthermore, it should be noted that the proposed project's large number of studio and one-bedroom units would generate few students and that it is possible that a portion of the proposed project's school-aged children would attend private schools or charter schools, thus reducing attendance at LAUSD schools. Although new students generated by the proposed project could impact schools serving the project site, as noted earlier, Solano Avenue Elementary, Florence Nightingale Middle School, Abraham Lincoln Senior High and Woodrow Wilson Senior High schools have sufficient capacity to meet future student needs.

The proposed project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Sections 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation under CEQA for impacts to school facilities. Prior to issuance of a building permit, the General Manager of LADBS or designee shall ensure that the applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Therefore, operational impacts to school services and facilities would be less than significant.

d. Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The LADRP maintains over 16,000 acres of parkland within approximately 400 regional, community and neighborhood parks, dozens of pocket and specialty parks, 184 recreation centers, 72 fitness areas, 612 swimming pools, 11 lakes, 187 summer youth camps, more than a dozen museums and historic sites, and hundreds of programs for youth, seniors, physically disabled and volunteers (LADRP, 2016).

The adequacy of parkland is typically measured in terms of acres of parkland per 1,000 residents (City of Los Angeles 1980). Currently, the City of Los Angeles has an overall ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents. The Central City North Los Angeles Community Plan Area has a ratio of 0.84 acres of neighborhood and community parkland per 1,000 residents (City of Los Angeles 2017). The existing ratio of neighborhood and community parks within the Central City North Community Plan Area is well below the standards proscribed by the City's adopted Public Recreation Plan (PRP) of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two

¹⁵ Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multi-family residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303.

acres each of neighborhood and community parkland per 1,000 persons in the long-term (City of Los Angeles 2017; 1980).

The project area is served by several public parks. The following LADRP facilities are located within a two-mile radius of the project site: Los Angeles State Historic Park located at 1245 North Spring Street, Radio Hills Garden located at 835 Elysian Park Avenue, Everett Triangle Park (Tear Drop Park) located along Everett Street, Grand Park located at 200 North Grand Avenue, Echo Park Lake located along Echo Park Avenue and Bellevue Avenue, Montecillo De Leo Politi Park located on Stadium Way between Scott Road and Academy Road, Lilac Terrace Park located on 1254 West Lilac Terrace, Los Angeles Plaza Park (also known as Father Serra Park) located at 125 Paseo De La Plaza, Buena Vista Meadow Picnic Area located on Meadow Road (East side of Dodger Stadium), Downey Recreation Center located at 1772 North Spring Street, and Lacy Street Neighborhood Park located between Avenue 26 and Lacy Street.

Recreation centers within a two-mile radius of the project site include: the Downey Recreation Center located at 219 South Avenue 18, Lincoln Heights Recreation Center located at 2302 Workman Street, Cypress Recreation Center located at 2630 Pepper Avenue, Alpine Recreation Center located at 817 Yale Street, Pecan Recreation Center located at the intersection of South Gless Street and East 1st Street, and Aliso Pico Recreation Center located at 370 South Clarence Street.

Also, Dodger Stadium is also located approximately 0.5 mile northwest of the project site, across the SR-110 Freeway.

The proposed project's estimated population increase of 425 new residents would result in a demand for approximately 0.447-acres of parkland to meet the City's neighborhood and community parkland standards for the short/immediate term and 0.894-acres to meet the City's neighborhood and community parkland long-term standards.

According to LADRP correspondence on February 13, 2017, provided as Appendix K-3 in this MND, while data regarding the level of use for the recreational facilities that serve the project site is not available, parks within the surrounding community are heavily utilized and often overburdened. As the existing recreational facilities in the project area are heavily utilized, and that the project proposes the development of an additional 118 residential units, additional capacity through retrofit, expansion, or new acreage would be necessary to keep the area at the current level of service (City of Los Angeles, 2017).

However, LAMC Section 12.21.G requires that open space be provided with the development of residential uses. **Table B-24, Proposed Project Open Space Requirements**, illustrates the approximated amount of open space that would be required according to unit types. The proposed project must provide a minimum of 12,200 sf of open space, which may include recreational facilities and amenities.

TABLE B-24
PROPOSED PROJECT OPEN SPACE REQUIREMENTS

Proposed Residential Units	Quantity	Factor (sq. ft./unit)^a	Open Space Requirement (sq. ft.)
Studio	84	100	8,400
One Bedroom	18	100	1,800
One Bedroom or more	16	125	2,000
Total	124		12,200

^a Factors based on LAMC Section 12.21.G

SOURCE: Johnson Fain, 2017.

The proposed project's recreational amenities are summarized in **Table B-25**, *Summary of Proposed Project Recreational Amenities*, below. The proposed project would provide 11,585 sf of common exterior recreational amenities that would be tailored to meet the needs of the anticipated residential population. Open space and recreational amenities would consist of a total of 17,457 sf. Because of the proposed project's smaller unit sizes, which may reduce the incidence of larger families and the demand for open space facilities, it is expected that the majority of the proposed project's recreational demand would take place within the project site. Residual off-site park use would likely be dispersed to parks serving the proposed project area that would be easily accessible and which have unique features that would be of interest to different residents. It is, thus, anticipated that impacts at any single park location would be negligible and the proposed project contribution to park use would not cause substantial degradation of existing facilities or require a new public park.

TABLE B-25
SUMMARY OF PROPOSED PROJECT RECREATIONAL AMENITIES

Recreation and Open Space Type	Square Feet
Open Space Common	
Level 2 – Exterior Landscape Roof Deck	8,509 sf
Level 2 – Interior Amenity Space	822 sf
Open Space Private	
Private Balcony area	950 sf
Level 3 – 7 Private Balcony Area (per level)	820 sf
	(Total of 4,100 sf)
Total	17,457 sf

SOURCE: Johnson Fain, 2017.

Section 17.12 and Section 12.33 of the LAMC, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density at which the land

may or will be developed. The area of land required for park and recreation dedication is based upon the maximum residential density at which the land may or will be developed. The proposed project lot area is approximately 29,924 (0.73-acre). Pursuant to Section 17.12, the maximum dedication is required for projects with more than 100 dwelling units and is equal to 32 percent of the gross subdivision area. Therefore, the dedication required for the proposed project would be approximately 32 percent of 0.73-acre, or approximately 0.22-acres (9,576 sf), unless in-lieu fees were paid. As mentioned above, Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the proposed project's residents to be credited against the proposed project's land dedication and/or in lieu fee requirement. As described above, the project would provide 11,585 sf (0.27 acres) of common recreational/amenity spaces, which exceeds the 0.22-acre dedication required under Section 17.12 of the LAMC.

Although it is anticipated that the proposed project would comply with Section 17.12 of the LAMC, the finalized project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional parkland dedication or fees must be paid. Pursuant to LAMC Section 17.12-A or 17.58, the applicant shall pay the applicable Quimby fees for the construction of dwelling units. Pursuant to LAMC Section 21.10, the applicant shall also pay the Dwelling Unit Construction Tax for construction of apartment buildings. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.

e. Other governmental services?

Less Than Significant Impact. The City of Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The LAPL system provides library facilities and services to the project site and the City of Los Angeles. The LAPL consists of the Central Library, eight regional branches, and 64 community branches, with a multimedia inventory of over 65 million items and 2,600 computer workstations with access to the internet and electronic databases (LAPL, 2016).

The LAPL service populations are based on the number of people residing in census tracts that are assigned to (i.e., served by) a specific library. The project site is served by the Chinatown Branch Library, Lincoln Heights Branch Library, and the Little Tokyo Branch Library (LAPL, 2017).

Table B-26, *Libraries Located in the Vicinity of the Proposed Project Site*, provides information regarding these libraries, including their distance/direction from the proposed project site, size, and population served.

TABLE B-26
LIBRARY FACILITIES LOCATED IN THE VICINITY OF THE PROPOSED PROJECT SITE

Library	Distance/ Direction from proposed Project Site ^a	Size in Square Feet ^b	Population Served ^c
Chinatown Branch Library	0.75 mile southwest	14,000 sf	38,839
Lincoln Heights Branch Library	1.2 miles northeast	21,780 sf	25,000 – 50,000
Little Tokyo Branch Library	1.45 mile southwest	2,500 sf	38,839

a Approximate distance/direction from proposed project site in miles is a straight line distance, not drive distance.

b Central City North Community Plan, December, 2000.

c South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, November 2016 and 1020 S. Figueroa Proposed Project Draft EIR, September 2016.

SOURCE: ESA PCR, 2016.

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: the net population increase resulting from the proposed project; the demand for library services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and whether the project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct support to the LAPL).

The Los Angeles Public Library Facilities Plan established criteria for the size of libraries. The plan recommended building 10,500 sf facilities for communities with less than 50,000 population and 12,500 sf libraries for communities with more than 50,000 population (City of Los Angeles, 2006). The proposed project is located within the Central City North Community Plan Area, which has a population of 24,580 people. Within the Central City North Community Plan or immediately adjacent to its borders, there are two public libraries, the Chinatown Branch Library and Little Tokyo Branch Libraries, as described above.

Development of the proposed project would increase demand for library services by increasing the permanent residential population in the area by approximately 425 people. In general, employees of commercial sites are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours.

There are three public libraries within three miles of the project site. The libraries that would serve the proposed project are the Chinatown Branch, the Lincoln Heights Branch, and the Little Tokyo Branch. Thus, the proposed project would be adequately served by existing library services and would not require new or physically altered facilities. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts

Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the proposed project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Central City North Community Plan Area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the proposed project is required to mitigate.

Based on the above considerations, the proposed project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the proposed project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Central City North Community Plan Area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government

and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. According, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the proposed project is required to mitigate.

Based on the above considerations, the proposed project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

Pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. Accordingly, impacts on public schools from related projects would be mitigated to less than significant with payment of developer fees. Furthermore, the proposed project would also pay school impact fees to ensure its contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Parks

As calculated above in Section 13, Population and Housing, the 81 related projects would result in the potential development of approximately 14,866 residential units and 53,518 new residents. To meet PRP goals of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two acres each of neighborhood and community parkland per 1,000 persons in the long-term, more than 535 acres of new neighborhood and community parkland in the short-term and 107 acres of new parkland may be required in the long term.

As with the proposed project, new related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition, LAMC Sections 17.12 and 12.33, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. In addition to the provision of on-site recreational amenities for related residential related projects, the implementation of required parks and recreational fees under the LAMC would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities.

As described above, the proposed project includes 11,585 sf (0.27 acres) of recreational/amenity spaces, which exceeds the 0.22-acre dedication that may otherwise be required under Section 17.12 of the LAMC. Although it is anticipated that the proposed project would comply with Section 17.12 of the LAMC, the finalized project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.

Based on the above considerations, the proposed project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new park facilities.

Other Governmental Services

The related projects' residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized project vicinity. The related projects would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. The related projects would be required to pay applicable development impact fees of the City of Los Angeles. Measure L, which was a ballot measure passed by voters in 2011, restores services at the LAPL that were cut during the recent recession, including the number of staff and hours of operation, and also provides LAPL with a mechanism to address the needs of additional residents. Measure L gradually restores library funding over four years, without raising taxes. The above fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from related projects. Similarly the proposed project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Based on the above considerations, the proposed project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new library facilities.

15. Recreation

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact (a–b). As discussed above in Response No. 14.d, operational activities associated with the proposed project would increase demand for park services. However, the proposed project would provide 11,585 sf (0.27 acres) of recreational amenities that would be tailored to meet the needs of the anticipated residential population. The proposed project would provide open space features that exceed the City's open space requirements. As such, the demand or use of nearby park facilities would be reduced at times by the proposed project. Nonetheless, to offset the proposed project's demand on park facilities and services, the project applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Section applicable LAMC requirements, as necessary. Therefore, with the proposed open space features and payment of applicable fees, the proposed project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant in this regard.

Cumulative Impacts

Recreation

Refer to the discussion under Response No. 14.d.

16. Transportation/Circulation

Portions of the following impact analysis pertaining to transportation and circulation are based on information contained in the Traffic Study for the 1201 N. Broadway Mixed-Use Project (Traffic Study) prepared by Gibson Transportation Consulting, Inc. in October 2016. The Traffic Study is included as Appendix L-1 of this IS/MND. An updated Revised Project Trip Generation for 1201 North Broadway memorandum (Updated Traffic Memo) submitted on March 2, 2017 is included as Appendix L-2 of this IS/MND. The City of Los Angeles Department of Transportation (LADOT) Approval Letter dated November 28, 2016 is included as Appendix L-3.

Would the project:

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

Less Than Significant Impact. The project would result in the development of 118 residential units and approximately 8,795 sf of general office space. The existing 25,800 sf of office uses at the project site would be removed and replaced by the project. The project would increase the development intensity on the project site, including a new residential population at the project site compared to existing conditions. Thus, the project would result in an increase in daily and peak-hour traffic within the traffic study area.

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the project site. However, because the existing office uses would be closed during construction and would not generate trips, the subtraction of existing trips from the existing roadway conditions would result in a minimal or no net increase in roadway traffic. As such, construction activities are expected to have a less than significant impact on street and intersection service levels.

As part of the project, a detailed Construction Management Plan (CMP), included as PDF-TRAF-1, would be provided. The CMP would include street closure information, a detour plan, haul routes, and a staging plan, and would be prepared and submitted to the City for review and approval. The CMP would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CMP shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the project site. PDF-TRAF-2 would also maintain adequate and safe pedestrian protection during construction.

Project Design Features

PDF-TRAF-1 The applicant shall prepare a detailed CMP that shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to North Broadway Avenue and Bishops Road, to ensure traffic safety on public rights of way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the project site's North Broadway Avenue driveway.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the project site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address the temporary relocation of the bus stop located at the northwest corner of North Broadway Avenue & Bishops Road.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

PDF-TRAF-2 The applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Specifically, this measure shall include the following:

- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- The applicant shall keep sidewalks open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

Once construction is complete, the project's residents, employees, and visitors would generate daily vehicle and transit trips that could affect the existing capacity of the street system. Potential traffic impacts are addressed in detail in the Traffic Study, provided as Appendix L-1, and Updated Traffic Memo, provided as Appendix L-2, of this IS/MND. The Traffic Study was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT), as discussed in the LADOT Approval Letter dated November 28, 2016 and provided as Appendix L-3 in this IS/MND.

A total of 12 signalized study intersections were selected for the project traffic analysis. Level of Service (LOS) is a qualitative measure used to describe traffic flow conditions, which range from excellent, nearly free-flow traffic at LOS A to restricted movements and tremendous delays at LOS F. The definitions of the LOS levels and their related V/C ratio for signalized intersections are shown in **Table B-27**, *Level of Service Definitions for Signalized Intersections*. The 12 intersections and respective LOS are summarized in **Table B-28**, *Levels of Service for Existing Conditions*.

TABLE B-27
LEVEL OF SERVICE FOR DEFINITIONS FOR SIGNALIZED INTERSECTIONS

Level of Service	Definition	Signalized V/C Ratio
A	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.	0.000 - 0.600
B	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601 - 0.700
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701 - 0.800
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801 - 0.900
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901 - 1.000
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 1.000

SOURCE: *Transportation Research Circular No. 212, Interim Materials on Highway Capacity* (Transportation Research Board, 1980).

TABLE B-28
LEVEL OF SERVICE FOR EXISTING CONDITIONS

No	Intersection	Peak Hour	V/C	LOS
1	Grand Avenue & Cesar Chavez Avenue	AM	0.729	C
		PM	0.745	C
2	Broadway & Cesar Chavez Avenue	AM	0.607	B
		PM	0.651	B
3	Hill Street & Alpine Street	AM	0.597	A
		PM	0.530	A
4	Broadway & Alpine Street	AM	0.598	A
		PM	0.600	A
5	Hill Street & College Street	AM	0.595	A
		PM	0.662	B
6	Broadway & College Street	AM	0.573	A
		PM	0.765	C
7	Broadway & Bernard Street	AM	0.573	A
		PM	0.499	A
8	Broadway & Bishops Road	AM	0.792	C
		PM	0.555	A
9	Broadway & Solano Avenue	AM	0.876	D
		PM	0.479	A
10	Avenue 18 & Broadway/Spring Street	AM	0.871	D
		PM	0.372	A
11	I-5 SB Ramps & Broadway	AM	0.464	A
		PM	0.444	A
12	I-5 NB Ramps & Broadway	AM	0.593	A
		PM	0.398	A

SOURCE: Gibson Transportation Consulting, Inc., October 2016.

As shown in Table B-28, all 12 study intersections currently operate at LOS D or better during the A.M. and P.M. peak hours. Procedures and methodology are described in detail in the Traffic Study.

As detailed in **Table B-29**, *Estimated Project Vehicle Trip Generation*, the project is anticipated to generate a total of 569 net new trips on a typical weekday, including 32 net new morning peak hour trips (-11 inbound, +43 outbound) and 46 net new afternoon peak hour trips (+41 inbound, +5 outbound).

TABLE B-29
ESTIMATED PROJECT VEHICLE TRIP GENERATION

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Apartment	118 du	785	12	48	60	47	26	73
Less 5% Transit/Walk-In [a]		(39)	(1)	(2)	(3)	(2)	(1)	(3)
Subtotal - Apartment		746	11	46	57	45	25	70
Office	9.0 ksf	99	12	2	14	2	11	13
Less 5% Transit/Walk-In [a]		(5)	(1)	0	(1)	0	(1)	(1)
Subtotal - Office		94	11	2	13	2	10	12
Total Proposed Project		840	22	48	70	47	35	82
Existing Uses to be Removed								
Office	25.8 ksf	285	35	5	40	6	32	38
Less 5% Transit/Walk-In [a]		(14)	(2)	0	(2)	0	(2)	(2)
Total Existing Uses to be Removed		271	33	5	38	6	30	36
Total Net New Project Trips		569	(11)	43	32	41	5	46

Note

[a] The project site is located within a 1/4 mile of the Metro Expo Line LATT/Ortho Station, therefore a 5% transit adjustment was applied, per Traffic Study Policies and Procedures (LADOT, August 2014).

SOURCE: Gibson Transportation Consulting, Inc., March 2017.

The project would have a significant impact on intersection service levels if it would increase V/C ratios above LOS standards set forth under LADOT guidelines. Under LADOT guidelines, a significant impact would occur if an increase in V/C value of more than 0.040 occurred under LOS C conditions; an increase in V/C value of more than 0.020 occurred under LOS D conditions; and an increase in V/C value of more than 0.010 occurred under LOS E and F conditions.

Future 2021 traffic volumes were developed to evaluate traffic conditions after completion of other planned related projects and the project. These future traffic conditions include traffic volumes from related projects (approved or pending projects expected to be built by the year 2021 in the project vicinity) added to existing traffic conditions, plus one percent ambient growth in traffic per year to simulate future traffic conditions with expected new growth in development in the area. Future traffic conditions representing the buildout conditions at the completion of the project are illustrated in **Table B-30, Future (2021) Traffic Conditions with Project**.

**TABLE B-30
FUTURE (2021) TRAFFIC CONDITIONS WITH PROJECT**

No.	Intersection	Peak Hour	Future (2021) w/o Project		Future (2021) w/ Project		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
1	Grand Avenue & Cesar Chavez Avenue	AM	0.915	E	0.915	E	0.000	NO
		PM	0.888	D	0.889	D	0.001	NO
2	Broadway & Cesar Chavez Avenue	AM	0.743	C	0.745	C	0.002	NO
		PM	0.892	D	0.896	D	0.004	NO
3	Hill Street & Alpine Street	AM	0.642	B	0.644	B	0.002	NO
		PM	0.577	A	0.579	A	0.002	NO
4	Broadway & Alpine Street	AM	0.685	B	0.687	B	0.002	NO
		PM	0.682	B	0.687	B	0.005	NO
5	Hill Street & College Street	AM	0.647	B	0.649	B	0.002	NO
		PM	0.759	C	0.767	C	0.008	NO
6	Broadway & College Street	AM	0.695	B	0.698	B	0.003	NO
		PM	0.855	D	0.868	D	0.013	NO
7	Broadway & Bernard Street	AM	0.619	B	0.626	B	0.007	NO
		PM	0.536	A	0.544	A	0.008	NO
8	Broadway & Bishops Road	AM	0.847	D	0.857	D	0.010	NO
		PM	0.603	B	0.617	B	0.014	NO
9	Broadway & Solano Avenue	AM	0.938	E	0.940	E	0.002	NO
		PM	0.518	A	0.525	A	0.007	NO
10	Avenue 18 & Broadway/Spring Street	AM	0.992	E	0.991	E	-0.001	NO
		PM	0.422	A	0.423	A	0.001	NO
11	I-5 SB Ramps & Broadway	AM	0.564	A	0.567	A	0.003	NO
		PM	0.539	A	0.539	A	0.000	NO
12	I-5 NB Ramps & Broadway	AM	0.673	B	0.673	B	0.000	NO
		PM	0.471	A	0.473	A	0.002	NO

SOURCE: Gibson Transportation Consulting, Inc., October 2016.

As shown in Table B-30, nine of the study intersections would operate at LOS D or better during both of the AM and PM peak hours. The three intersections where LOS conditions would deteriorate to LOS E are:

- Grand Avenue & Cesar Chavez Avenue – LOS E (AM peak hour);
- Broadway & Solano Avenue – LOS E (AM peak hour); and
- Avenue 18 & Broadway/Spring Street – LOS E (AM Peak hour).

As detailed in Table B-30, when measuring the Future with Project Conditions against Future without Project Conditions, the incremental increases in the V/C ratios resulting from project

traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 12 study intersections. Therefore, because the project would not exceed LOS threshold levels under future buildout conditions, impacts on intersection service levels that were established to measure the effectiveness for the performance of the circulation system would be less than significant, and no mitigation measures are required.

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?

Less Than Significant Impact. The CMP was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all State highways and some arterials within the County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to comply with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of State gas tax funding.

Under the CMP, an increase in the freeway volume by 150 vehicles per hour during the A.M. or P.M. peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of two percent in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the A.M. or P.M. peak hour requires further analysis.

There are no CMP arterial monitoring intersections within the Study Area. The nearest arterial monitoring intersection is Alvarado Street & Sunset Boulevard, approximately 1.80 miles west of the project site. The project would not add 50 or more peak hour trips at the identified monitoring intersection based on the distribution percentages and project traffic assignment assumptions for this site. Therefore, further analysis of the CMP arterial monitoring stations is not required.

The CMP identifies the following two mainline freeway monitoring locations within the project Study Area:

- SR-110 at Alpine Street (0.75 miles southwest of the project site)
- US 101 north of Vignes Street (1.00 mile south of the project site)

The project would add up to 17 peak hour trips to the SR-110 freeway monitoring location and no trips to the US 101 freeway monitoring location. The project would not add 150 trips in either direction during either peak hour to the CMP mainline freeway monitoring location and, therefore, further CMP analysis is not required.

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?

No Impact. The project site is not located within the vicinity of a private or public airport or planning boundary of an airport land use plan. Additionally, the project does not propose any uses

that would increase the frequency of air traffic. The project would be 78.5 feet tall and would therefore not trigger Federal Aviation Administration (FAA) requirements regarding rooftop lighting (FAA, 2015). Therefore, the project would not change air traffic patterns, increase air traffic levels or result in changes that would result in substantial safety risks. As a result, the project would have no impact.

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

Less Than Significant Impact. Vehicular access to the project site would be provided via one full access driveway on North Broadway. The circulation aisle widths of the parking areas should be designed to allow adequate and safe circulation of vehicles without significant conflicts. The driveway would be designed based on LADOT standards.

Pedestrian access to the project would be provided along North Broadway and Bishops Road. The project access locations would be designed to City standards and would provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety, as well as conform to current ADA specifications. All roadways and driveways intersect at right angles, and street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Separate pedestrian entrances would provide access from the adjacent streets, parking facilities, and transit stops.

Visitors, patrons and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. No dedicated bicycle lanes currently exist on North Broadway or Bishops Road. In order to facilitate bicycle use, bicycle parking spaces would be provided on-site, consistent with the Bicycle Parking Ordinance, LAMC Section 12.21 A16(a)(2).

Based on the discussion above and with implementation of PDF-TRAF-2, the project would not substantially increase hazards for vehicles, pedestrians, and bicyclists accessing the project site. Therefore, impacts related to hazards would be less than significant.

e. Result in inadequate emergency access?

Less than Significant Impact. The project site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the project would develop a Construction Management Plan (PDF-TRAF-1), which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Long-term emergency access would continue to be provided as under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential

residents. Project site access and circulation plans would be subject to review and approval by the LAFD. Thus impacts would be less than significant.

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?

Bicycle Plans and Programs

Less Than Significant Impact. The City of Los Angeles adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. The 2010 Bicycle Plan proposes dedicated bicycle lanes on Figueroa Street south of Cesar E. Chavez Boulevard, Broadway, Spring Street north of College Street, Alameda Street between Cesar E. Chavez Boulevard and College Street, Spring Street south of Cesar E. Chavez Boulevard, Main Street, and Cesar E. Chavez Boulevard. Bicycle routes/bicycle friendly streets are proposed on New High Street, Spring Street between College Station and Cesar E. Chavez Boulevard, Ord Street, Alpine Street between Broadway and Main Street, and College Street between Broadway and Main Street.

The City of Los Angeles Mobility Plan 2035 identifies a Bicycle Enhanced Network. The plan entails roadways be improved with bike detectors at actuated signals. As detailed in the Mobility Plan, within the Study Area, the Bicycle Enhanced Network designates the following corridors for priority planned bicycle lanes: Broadway north of Cesar Chavez Avenue, Main Street, Spring Street south of Cesar Chavez Avenue, Alpine Street/Vignes Street east of Broadway, and Cesar E. Chavez Boulevard/Sunset Boulevard west of New High Street.

The Mobility Plan also identifies a Bicycle Lane Network that consists of protected bicycle lanes, priority bicycle lanes, and planned bicycle lanes. The Bicycle Lane Network would include bicycle lanes on Pasadena Avenue north/east of Broadway, Spring Street north of Ord Street, Figueroa Street south of Cesar E. Chavez Boulevard, and Cesar E. Chavez Boulevard east of New High Street.

The project would not add new driveways or alter rights of way along roadways that are planned to be included in either the Master Plan or the Mobility Plan and, as such, would not interfere with the City's planned bicycle facilities along these roadways. Therefore, the project would be consistent with the City's Bicycle Master Plan and Mobility Plan.

The project's bicycle parking program is discussed in detail in Attachment A, *Project Description*, of this IS/MND (Section 3, Access and Parking). As described therein, the project would be required under Code Sec. 12.21 A.16 to provide a 140 bicycle parking spaces, including five long-term and five short-term bicycle parking spaces for the commercial uses. The project would provide a total of 156 bicycle parking spaces, including 133 long-term residential spaces, 13 short-term residential spaces, and ten total commercial bicycle spaces. Therefore, the project would meet the Code requirements and impacts related to parking would be less than significant.

Transit Plans and Programs

Less Than Significant Impact. A purpose of the City's Mobility Plan 2035 is to reduce vehicle trips, by focusing growth in proximity to public transit and expanding mobility through better quality public transit. The project site is served by numerous established transit routes. The project is also located within walking distance to the Metro Gold Line Light Rail Chinatown Station and in proximity to other local and regional transit lines. The total available capacity of the transit system within walking distance (one quarter-mile) of the project site during the morning and afternoon peak hours, is approximately 1,506 additional riders during the morning peak hour and 1,402 riders during the afternoon peak hour (based on the frequency of service of each line, the standing capacity of each bus or train, and the average peak hour load in each direction). The project would support the public transit facilities and therefore be consistent with the Mobility Plan 2035.

The 2010 CMP for Los Angeles County describes the statutory requirement for analyzing the regional transit system as a mechanism for reducing congestion, providing minimum performance measures for transit analysis, and reporting on the function and adequacy of the CMP transit network (Metro, 2010). CMP 2008 guidelines provide a mechanism for estimating future transit demand associated with development projects. Estimated transit use is generated by multiplying a project's daily and peak hour vehicle trips by 1.4 to determine person trips, and to provide guidance regarding the percentage of project person trips that may use public transit to travel to and from the project site. As detailed in the Traffic Study provided as Appendix L-1 of this IS/MND, the total capacity of the analyzed transit lines within the Study Area during the morning and afternoon peak hours is approximately 1,506 trips and 1,402 trips, respectively. The project's morning and afternoon peak hour person trips by transit are projected at three and four trips, respectively, or less than one percent of the available capacity during morning and afternoon peak. The Study Area is served by numerous bus lines, as well as the Metro Gold Line, Metro Purple Line and Metro Red Line. Overall, the total transit capacity of the numerous transit lines can accommodate the project's transit trips. Therefore, the project would not exceed regional transit capacity and transit impacts would be less than significant.

Parking

The project is located in a transit priority area as defined in Public Resources Code Section 21099 and the project's parking impacts are not considered to have significant impacts on the environment. Therefore, the descriptions regarding project parking are provided for informational purposes only. The project's bicycle parking program is discussed in detail in Attachment A, *Project Description*, of this IS/MND (Section 3, Access and Parking). As described therein, the project would be required under AB 744 and Code Sec. 12.21 A.4 to provide 161 total parking spaces, including 143 spaces to serve the residential use and 18 spaces to serve the office/commercial use. The project would provide 170 parking spaces, including 151 spaces to serve the residential use and 19 spaces to serve the office/commercial use. Therefore, the project would meet the Code requirements and impacts related to parking would be less than significant.

Cumulative Impacts

Transportation and Circulation

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a CMP, to reduce potential traffic impacts during construction.

The future (2021) service level conditions, presented in Table B-30 above represent a combination of estimated trips from all related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table B-30, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs, including development of Metro's LRTP. The cumulative increase in transit demand under related projects is addressed and supported by the CMP and the Mobility Element 2035. As such, related projects would be consistent with adopted policies, plans or programs regarding public transit. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of adequate bicycle and vehicle parking for their site populations.

As indicated in the discussion of project impacts above, the project would not have a significant impact on public transit and would be consistent with the City's Mobility Element 2035. The project would result in a less than significant traffic impact during construction and operation and would implement a CMP that would incorporate notification and safety procedures and controls. In addition, the project would provide bicycle and vehicle parking in compliance with City Code requirements. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

17. Tribal Cultural Resources

Would the project:

- a. **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

Less Than Significant Impact. Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCR) and establishes a formal consultation process for California Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a proposed project.

The City commenced tribal notification in accordance with AB 52 on March 6, 2017, via a mailing to all of the surrounding tribes on the AB 52 notification list. The 30-day notification response window closed on April 5, 2017. No tribes have commented on the request. So as to ensure any unforeseen and inadvertent discovery of TCRs would not result in a potentially significant impact, in the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project site until the potential TCR(s) is properly assessed following specific protocol required by the Department of City Planning. Therefore, impacts would be less than significant and no mitigation measures are required

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

Less Than Significant Impact. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As discussed above, the City provided notice to tribes soliciting requests for consultation on March 6, 2017. So as to ensure any unforeseen and inadvertent discovery of TCRs would not result in a potentially significant impact, in the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would

temporarily cease on the Project site until the potential TCR(s) is properly assessed following specific protocol required by the Department of City Planning. Therefore, impacts would be less than significant and no mitigation measures are required

Cumulative Impacts

Tribal Cultural Resources

Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is low. Further, in association with CEQA review, future AB 52 consultations with Native American tribes in order to identify tribal cultural resources would be required for projects that have the potential to cause significant impacts to tribal cultural resources. Therefore, to the extent impacts on tribal cultural resources from cumulative projects may occur, contribution from the project would not be cumulatively considerable and there would be no cumulative impact.

18. Utilities and Service Systems

Portions of the following impact analysis pertaining to water and wastewater disposal are based on information contained in the Civil Engineering Technical Memo (Civil Engineering Memo) prepared by KPF Consulting Engineers April 4, 2017. The Civil Engineering Memo is included as Appendix H of this IS/MND.

Would the project:

- a. **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b. **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Wastewater

Less Than Significant Impact. The City of Los Angeles Department of Public Works (LADPW) provides wastewater services for the project site. Any wastewater that would be generated at the Site would be treated at the Hyperion Treatment Plant (HTP). The HTP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP). The HTP has a current average dry weather flow of 362 million gallons per day (mgd), leaving approximately 88 mgd of capacity available (City of Los Angeles Bureau of Sanitation, 2016; City of Los Angeles Department of Public Works, 2016).

Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and five-

mile outfall pipeline). Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis or when repairs are being completed on the five-mile outfall. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis. Major routine maintenance and repair efforts to the five-mile outfall were most recently completed in November 2015 (City of Los Angeles Department of Public Works, 2016). HTP effluent is required to meet the LARWQCB's requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

The project's new residential and office/commercial uses would generate additional wastewater that would require conveyance and treatment. On-site wastewater generation is anticipated to total approximately 11,735 gallons per day (gpd), or 0.0117 mgd under the project, as summarized in **Table B-31, Estimated Project Wastewater Generation**. This increase represents less than 0.01 percent of the remaining treatment capacity at the HTP. Given the amount of wastewater generated by the project and the existing wastewater treatment capacity at the HTP, adequate wastewater treatment capacity would be available to serve the project. The existing public sanitary sewer main lines near the project site are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. As stated in the Civil Engineering Memo, provided as Appendix H of this IS/MND, the sanitary main sewer that serves the project site is an existing 12-inch diameter VCP located along North Broadway. There is also an existing 8-inch diameter VCP located along Bishops Road.

TABLE B-31
ESTIMATED PROJECT WASTEWATER GENERATION

Land Use	Unit	Generation Factor ^a	Wastewater Generation (GPD)
Proposed Use			
Studio	84 DU	75 GPD/unit	6,300
1 Bdrm	18 DU	110 GPD/unit	1,980
1 Bdrm+ (2 habitable rooms)	16 DU	150 GPD/unit	2,400
Office/Commercial	8,795 SF	120 GPD/1,000 sf	1,055
Total			11,735
Existing Use			
Office	25,800 SF	120 GPD/1,000 sf	3,096
Net Increase (Proposed-Existing)			8,639

^a Generation factors are obtained from the Sewer Capacity Availability Request (SCAR), processed on April 3, 2017. The total wastewater generation according to the Final Site Plan will be 11,735 GPD. Totals may not add up to be the same as the SCAR. Calculations in the SCAR were performed for a slightly larger project with 93,112 square feet of floor area and 124 residential units compared to the proposed project with 89,434 square feet of floor area and 118 residential units. Therefore, the estimated project wastewater generation would be slightly less than shown in the SCAR. This amount is still negligible and represents less than 0.01 percent of the remaining treatment capacity at HTP.
SOURCE: ESA PCR, 2017.

Construction of the project would include all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. As discussed above, the project would not generate sewer flows that would jeopardize the ability of the HTP to operate within its established wastewater treatment requirements. As a result, the project would not exceed the requirements of the LARWQCB and a less than significant impact would result. No mitigation measures are required.

Water

Less Than Significant Impact. The project consists of a mixed-use development that includes residential and office/commercial uses. Based on the SAR, provided in Figure 7 of the Civil Engineering Memo, LADWP would provide the project with domestic and fire water supplies, as provided by a 24-inch diameter water main within the North Broadway right-of-way and a 4-inch diameter water main within the Bishops Road right-of-way. Based on the results provided by the LADWP within the SAR dated October 29, 2016, provided as Figure 7 of the Civil Engineering Memo, indicates that the 24-inch main line on North Broadway has a maximum pressure of 79 psi (pounds per square inch), the 12 inch main line on S. Grand Avenue has a maximum pressure of 56 pounds per square inch based on the street curb elevation of 334 feet above sea level.

The proposed sizes and locations for the domestic water and fire water points of connection would be determined by the Plumbing Engineer and Fire Sprinkler engineer, respectively, during design. The locations of the double detector check assembly and fire department connection would be determined based on feedback from the City of Los Angeles Fire Department. LADWP would be coordinated with accordingly based on the final location both domestic and fire water points of connection. Based on the SAR, the 24-inch water main line would have capacity for the project.

The project would implement all applicable mandatory measures within the City's Green Building Code that would further reduce the project's water use and wastewater generation. The project would also 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). As there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the project, impacts would be less than significant, and no mitigation measures are required.

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?

Less Than Significant Impact. The existing project site is entirely impervious without storm water mitigation or treatment systems. The proposed project will incorporate post-construction BMPs to treat storm water for pollutants and control runoff. There are no known current deficiencies in the local stormwater system that serves the project site. Based on City record data,

existing storm water runoff from the project site is conveyed by sheet flow towards the sidewalk and into the curb and gutter along North Broadway. Based on visual observation, there also appears to be curb drains along North Broadway that allow storm water runoff from the existing building roof to flow to the curb and gutter. The runoff then flows into the catch basin at the corner of North Broadway and Bishops Avenue. Based on City record data, the catch basin leads to a 12-inch Reinforced Concrete storm drain in Bishops Road that ultimately leads to the 33-inch VCP that flows southerly on North Broadway.

As stated above in Response to No. 9.a, the project will be designed based on the Los Angeles County Department of Public Works Hydrology Manual and City LID Ordinance. Because the existing project site is impervious, the proposed site development would not increase the volume or flow rate of the storm runoff. As the storm drain system can adequately handle existing flows, the project's stormwater flows would not exceed the capacity of the storm drain system. As stated in the Civil Engineering Memo, provided as Appendix H in this IS/MND, if infiltration is determined to be a feasible Best Management Practice for the project, three 4-foot diameter deep infiltration drywells will be required. A formal geotechnical report with infiltration recommendations is required to determine feasibility of an on-site infiltration system. If stormwater capture and use will be used, an approximately 15,430 gallon rainwater cistern will be required. The cistern will need to be emptied at least once during the rainy season for capture and use to be feasible. Should the drywells and cistern be determined to be infeasible, a bio-infiltration or bio-retention system will be required. A combination system may be permitted to meet the LID stormwater treatment requirement.

Final plan check by the City's Bureau of Engineering would ensure that adequate capacity is available in the storm drain system prior to project approval. The applicant would be responsible for providing the necessary storm drain infrastructure to serve the project site, as well as any extensions to the existing system in the area. Therefore, a less than significant impact would result. No mitigation measures are required.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 sf of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 sf of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. As the project does not meet the established thresholds, no WSA is required.

On-site water consumption is commonly estimated as 120 percent of on-site wastewater generation. Based on the anticipated amount of wastewater generated as a result of the project 11,735 gpd, the project would generate a water demand of approximately 14,082 gpd or 15.78 acre-feet per year (AFY), without accounting for regulatory water conservation features beyond

reductions embedded in the wastewater generation rates used for calculating the demand.¹⁶ With implementation of additional water conservation measures per regulatory requirements, and current practices, the project's actual water demand would be less than the amount stated above. Compliance with water conservation measures and implementation of LID would reduce this projected water demand.

According to the reliability data in the City of Los Angeles Urban Water Management Plan 2015, (UWMP) over the period from 2020 to 2040, the projected water demand with passive water conservation features will increase from 611,800 AFY to 675,700 AFY, representing an annual increase of 3,195 AFY or 5 percent (LADWP, 2015). This estimated supply takes into account its entitled water availability. The UWMP is based on SCAG growth projections and takes into account the all expected regional growth. The UWMP is updated on regular five year cycles and includes programs to meet the supply requirements.

The project would result in estimated water demand of approximately 15.78 AFY when fully occupied. The increase in water demand generated by the project would constitute less than 0.01 percent of the City's projected water demand for 2040 (675,700 AFY). The project would fall within the available and projected water supplies projected in the 2015 UWMP. As there would be sufficient water supplies available to serve the project, impacts regarding supply would be less than significant, and no mitigation measures are required.

e. Result in a determination by the wastewater treatment provider which services or may serve the project that it has adequate capacity or service the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in Response No. 17.b above, the project would not exceed the treatment capacity of the HTP. Specifically, the project's projected wastewater generation represents a negligible percentage (less than 0.01 percent) of the remaining available capacity at the HTP. Further, the Bureau of Sanitation determined that on April 3, 2017, there is capacity available to handle the anticipated discharge from the proposed project. As there would be adequate sewer capacity available to accommodate the proposed project, impacts would be less than significant with respect to wastewater treatment capacity and no mitigation measures are required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Solid waste management in the City involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City BOS is responsible for developing strategies to manage solid waste generation and disposal in the City. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public

¹⁶ The water demand would be consistent with the estimated wastewater generation of the project per Table B-31, Estimated Wastewater Generation. To be conservative, 20 percent was added (to account for outdoor water use).

facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 112 million tons as of December 2014, the most recent data available (County of Los Angeles Department of Public Works, 2015). The average daily disposal capacity is 28,849 tons per day and the average daily disposal rate is 14,777 tons per day, leaving a residual daily capacity of 14,072 tons per day. In addition to in-County landfills, out-of-County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2029 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

As illustrated in **Table B-32, Project Construction Debris**, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the project would generate approximately 370 lbs/day (0.18 tons/day or 68 tons/year) of solid waste beyond existing conditions. The project's additional generation of 68 tons/day would comprise approximately 0.48 percent of the residual daily capacity of 14,072 tons per day. It would represent less than 0.001 percent of the 112 million tons that would be accommodated prior to 2019. As such, the solid waste generated by the project could be accommodated by the County's available regional landfills.

**TABLE B-32
PROJECT CONSTRUCTION DEBRIS**

Land Uses	Quantity	Factor ^{a,b}	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Office	25,800 sf	6 lbs/1,000 sf/day	154.8	0.0774	28
		Total	154.8	0.0774	28
Proposed Land Uses					
Residential	118 units	4 lbs/unit/day	472	0.24	86
Office/Commercial	8,795 sf	6 lbs/1,000 sf/day	53	0.03	10
		Total	525	0.26	96
		Net Increase (Proposed-Existing)	370	0.1826	68

A du = dwelling unit; sf = square feet; lbs. = pounds.

b Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed December 15, 2016.

SOURCE: ESA PCR, 2017.

Construction of the project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of

construction associated debris at inert debris facilities located within the County. Construction and Demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this regulation, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 94 percent, thus exceeding the 70 percent reclamation standard.

As of 2014, Azusa Land Reclamation, the only permitted Inert Waste Landfill in the County with a full solid waste facility permit, had a remaining capacity of 59.83 million tons. Given the remaining permitted capacity and the average disposal rate of 1,215 tons per day in 2014, this landfill's capacity will be exhausted in 189 years. Other inert debris facilities that process inert waste and other construction and demolition waste, in 2014 collectively handled nearly 4.35 million tons (County of Los Angeles Department of Public Works, 2015). On a daily basis 13,933 tons per day were disposed in contrast to 31,098 tons per day of capacity. Hence, there is substantial capacity available to accommodate construction and demolition wastes over the foreseeable future.

In order to meet the diversion goals of the California Integrated Waste Management Act and the City, C&D materials would be salvaged and recycled 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 LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained AB 939 Compliance Permit from the City's BOS. Additionally, in compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program. The applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. Disposal and recycling of the construction debris would be required to comply with all Federal, State, and local regulations. Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste. Based on the above, a less than significant impact regarding solid waste would occur.

g. Comply with Federal, State, and local statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City of Los Angeles, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The project does not include any component that would conflict with State laws

governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. In compliance with LAMC, the proposed project would 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. Thus, there would be less than significant impacts in regards to compliance with Federal, State, and local statutes and regulations related to solid waste.

h. Other utilities and service systems?

Electricity

Less Than Significant Impact. Electricity transmission to the project site is provided and maintained by LADWP. Future plans regarding the provision of electrical services are presented in regularly updated Integrated Resource Plans (IRPs). These plans identify future demand for services and provide a framework for how LADWP plans on continuing to meet future consumer demand. The current IRP is based on a 20-year planning horizon. The LADWP is required to meet operational, planning reserve, and reliability criteria, as well as the resource adequacy standards of the Western Electricity Coordinating Council and the North American Electric Reliability Corporation.

LADWP's Power System served approximately 3.8 million people in 2015 and is the nation's largest municipal electric utility. LADWP has a net dependable generation capacity greater than 7,628 megawatts (MW) (LADWP, 2015). LADWP is fully resourced to meet peak demand but maintains transmission and wholesale marketing operations to keep production costs low and increase system reliability. The LADWP December 2015 forecast, as presented in the 2015 IRP, indicates a 2021-2022 fiscal year demand for approximately 23,150 gigawatt hours (GWh) per year (LADWP, 2015).

The project's estimated energy consumption is shown in **Table B-33**, *Estimated Electricity Use*. The estimates are based on generation factors provided in the 2013 SCAQMD California Emissions Estimator Model. As indicated in Table B-33, the annual consumption of electricity would be approximately 990,309 kilowatt-hours (kWh). When compared to the estimated 2017-2018 LADWP demand of 23.5 billion kWh per year, the project's energy consumption would represent approximately less than 0.00004 percent of total demand. This amount is negligible, and is within the anticipated service capabilities of LADWP. As shown in Figure 9 of the Civil Engineering Memo, provided in Appendix H, of this MND, LADWP issued a will-serve letter on January 30, 2017 stating that electric service is available and will be provided for the project.

Appendix F of the State *CEQA Guidelines* states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting, and Impact Analysis portions of technical sections.

TABLE B-33
ESTIMATED ELECTRICITY USE

Land Use	Unit or sq. ft.	Consumption Factor (kWh/unit/year)^a	Annual Electricity Consumption (kWh)
Proposed Use			
Office/Commercial	8,795 sf	12.11	106,507
Parking Structure	170 spaces (~68,000 sf)	5.84	397,120
Common Interior Amenity Space	822 sf	10.54	8,664
Apartments	118 DU	4,051	478,018
Total Proposed Consumption			990,309

^a Electricity demand generation factors based on SCAQMD California Emissions Estimator Model, Appendix D, Default Data Tables (September 2016), Table 8.1.b. Estimates include correction factors in compliance with the Title 24 (2016) Building Standards Code.

SOURCE: ESA PCR, 2017.

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Part 11 of the Title 24 Building Standards Code is referred to as the CALGreen Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential and nonresidential uses. The new measures take effect on January 1, 2017. The project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance. According to the CEC, the Title 24 (2016) standards use 28 percent less energy for residential and 5 percent less energy for nonresidential lighting, heating, cooling, ventilation, and water heating compared to the previous Title 24 (2013) standards. The project would also implement all applicable mandatory measures within the City's Green Building Code that would reduce the project's energy use.

The project would replace the existing office building and associated surface parking lot with a new mixed-use residential building. The proposed project would provide 118 residential units, 8,795 sf of ground floor office/commercial uses, and 822 sf of interior amenity space. The project would be developed to comply with stringent building energy efficiency standards, including energy efficiency standards for HVAC systems, lighting energy efficiency, and water efficient appliances and fixtures. As a result, consistent with CEQA Guidelines Appendix F requirements, the project would reduce wasteful or inefficient energy consumption with respect to electricity.

Natural Gas

Less Than Significant Impact. Natural gas is provided to the project site by the Southern California Gas Company (SoCal Gas). According to the 2014 California Gas Report, the most recent report available, California natural gas demand is expected to decrease at a modest rate of 0.2 percent per year from 2014 to 2035 for residential, commercial, electric generation, and industrial markets. This is due to increased energy efficiency programs, increasing reliance on renewable electric generation (e.g. solar and wind) as well as declining industrial demands as California continues its transition from a manufacturing-based to a service-based economy (CGEU, 2014). California natural gas utilities including SoCal Gas, interstate pipelines and in-state natural gas storage facilities have increased their delivery and receipt capacity to meet natural gas growth. SoCal Gas is supported in its planning effort by the California Energy Commission, which provides Integrated Energy Policy Reports, with annual updates that evaluate future demand for natural gas and supply considerations.

The *2014 California Gas Report* indicates that, with only minor variations from year to year, SoCal Gas is projected to provide approximately 982 billion cubic feet (bcf) per year of natural gas over the next 20-year planning horizon. The report also indicates that SoCal Gas has a substantially higher capacity available (CGEU, 2014).

The project's estimated use of natural gas is shown in **Table B-34, *Estimated Natural Gas Use***. This estimate is based on generation factors provided in the 2013 SCAQMD California Emissions Estimator Model. As indicated therein, the project would generate a demand for approximately 1,426,191 kBtu per year, which represents less than 0.0004 percent of the estimated annual demand of 306,000 million kBtu per year. This amount is negligible and is within the anticipated service capabilities of SoCal Gas.

**TABLE B-34
ESTIMATED NATURAL GAS USE**

Land Use	Unit or sq. ft.	Consumption Factor (kBtu/unit/year) ^a	Annual Natural Gas Consumption (kBtu/year)
Proposed Use			
Office/Commercial	8,795 sf	9.07	79,771
Parking Structure	170 spaces (~68,000 sf)	N/A	N/A
Common Interior Amenity Space	822 sf	16.27	13,374
Apartments	118 DU	11,297	1,333,046
Total Proposed Consumption			1,426,191

^a Natural gas demand generation factors based on SCAQMD California Emissions Estimator Model, Appendix Default Data Tables (September 2016), Table 8.1. kBtu = thousand British thermal units. Estimates include correction factors in compliance with the Title 24 (2016) Building Standards Code.

SOURCE: ESA PCR, 2017.

Furthermore, utility providers are required by the CEC and the California Public Utilities Commission (CPUC) to plan for necessary upgrades and expansions to their systems to ensure that adequate service would be provided. As such, the project would have a less than significant

impact on electricity and natural gas utilities and service systems. No further analysis of this topic is necessary and no mitigation measures are required. Notwithstanding, the analysis of GHG emissions evaluates energy use as it effects air emissions and potential conservation measures that will reduce energy consumption as well as the emission of GHGs. No mitigation measures are required.

The project would replace the existing office building and associated surface parking lot with a new mixed-use residential building. The proposed project would provide 118 residential units, 8,795 sf of ground floor commercial/retail uses, and 822 sf of interior amenity space. The project would be developed to comply with stringent building energy efficiency standards, including energy efficiency standards for HVAC systems and other appliances. As a result, consistent with *CEQA Guidelines* Appendix F requirements, the project would reduce wasteful or inefficient energy consumption with respect to natural gas consumption.

Transportation Fuels

Less Than Significant Impact. Construction and operation of the project would result in transportation-related energy use primarily as the result of gasoline and diesel consumption. Construction equipment associated with project would comply with energy-saving measures, such as the CARB anti-idling regulation, which generally limits idling from trucks to five minutes at any location. According to the CARB staff report that was prepared at the time the anti-idling regulation was being proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and nitrogen oxide (NO_x) emissions by 64 and 78 percent respectively in analysis year 2009 (CARB, 2016). These reductions in emissions are directly attributable to overall reduced idling times and reduced idling fuel combustion as a result of compliance with the regulation, and the project's compliance would result in energy savings of approximately 64 percent in the absence of the anti-idling ATCM (assuming a fuel reduction equivalent to the percent reduction of particulate matter or NO_x as estimated by CARB - the lesser value [i.e., 64 percent] is used as a conservative assumption).

The project represents an urban infill development, since it would be undertaken on a currently developed site, and would be located near existing off-site commercial and retail destinations and in proximity to existing public transit stops, which would result in reduced vehicle trips and vehicle miles traveled (VMT) compared to a project located at a greenfield site or other less developed location. According to the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, land use characteristics and site design features contribute to trip and VMT reductions.

The number of trips expected to be generated by the project is based on the project's Traffic Impact Analysis prepared by Gibson Transportation Consulting, Inc. (see Section 16, Transportation/Circulation). These rates are based on surveys of similar land uses and relate the number of vehicle trips traveling to and from the project site to the size of development of each land use. A 5 percent trip reduction credit was factored into analysis to account for the project's proximity to a transit corridor. Locating a project with high density near transit facilities encourages the use of transit by people traveling to or from a project site. The project site is

located on the same corner as the Broadway/Bishops Metro bus station. This station provides service for numerous routes (e.g. 28, 45, 83, and DASH Lincoln Heights/Chinatown) which are about a quarter mile from Union Station connect to Union Station The Bernard/Broadway station, 1000 feet south of the project site, services all the above listed routes as well as the Metro bus route DASH Downtown B, This bus route provides direct service to and from Union Station and, consequently, a larger network of rail systems.

Additionally, other trip reductions were incorporated into CalEEMod and are functions of a number of measures outlined in CAPCOA'S *Quantifying Greenhouse Gas Mitigation Measures*. The overall reduction in VMT factored into the project is approximately 21 percent. This total draws from the CAPCOA quantified measures listed below:¹⁷

- **LUT-1 (Increased Density):** States that “[i]ncreased densities affect the distance people travel and provide greater options for the mode of travel they choose” (CARB, 2010). Measure LUT-1 also states that increased densities “provides a foundation for implementation of many other strategies which would benefit from increased densities” such as “enhanced transit service” (CARB, 2010). Since the project proposes a high density apartment building, this measure and its associated trip reductions take effect.
- **LUT-4 (Increase Destination Accessibility):** States that “the project will be located in an area with high accessibility destinations” and is based on a project’s travel time to jobs, or other attractions (CARB, 2010). The project site is located about 2 miles from downtown Los Angeles and 6 miles from Hollywood, both of which SCAG recognizes as job centers.
- **LUT-9 (Improve Design of Development):** States that “the project will include improved design elements to enhance walkability and connectivity” (CARB, 2010). The Project has been properly designed and located in a walkable area such that it would result in a substantial reduction in emissions from mobile sources and would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average.

The project’s specific location in proximity to high-quality transit, including the Metro Gold, Red, and Purple Lines and multiple bus routes, its mix of uses, proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and highly walkable environment support the finding in this analysis that the project has been properly located so that its development would achieve a reduction in VMT.

Cumulative Impacts

Utilities and Service Systems

Water Supply

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. None of the related projects is sufficiently close to the project site so as to contribute with the project to the adjacent infrastructure demand and capacity for meeting domestic demand and firefighting capacity.

¹⁷ Refer to Appendix F for list of assumptions and more detailed analysis.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP is based on the growth projects that are provided in the SCAG RTP, which is updated on 4-year cycles to account for changes in growth rates. It accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects is required to be consistent with the SCAG RTP projections in order to be accounted for in LADWP's UWMP current and projected available water demand. Should the related projects be accounted for in LADWP's UWMP, no significant cumulative water supply impact is anticipated from cumulative development. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the CWC) within its service area. These contribute to ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements.

The project impacts to water supplies would fall within the available and projected water supplies projected in the UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts regarding water supply would be less than significant.

Wastewater

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. None of the related projects is sufficiently close to the project site so as to contribute with the project to the adjacent infrastructure demand and capacity for meeting domestic demand and firefighting capacity.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP is based on the growth projects that are provided in the SCAG RTP, which is updated on 4-year cycles to account for changes in growth rates. It accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects is required to be consistent with the SCAG RTP projections in order to be accounted for in LADWP's UWMP current and projected available water demand. Should the related projects be accounted for in LADWP's UWMP, no significant cumulative water supply impact is anticipated from cumulative development. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the CWC) within its service area. These contribute to ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements.

The project impacts to water supplies would fall within the available and projected water supplies projected in the UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts regarding water supply would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The analysis for the project above is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing demand and increases in demand associated with growth. Therefore, the analyses associated with that plan take into account cumulative development.

As indicated for the analysis above, the remaining disposal capacity for the County's Class III landfills as well as the inert debris facilities would be sufficient to meet future needs. Related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the project would be required to comply with all Federal, State, and local regulations including the City's Green Building Code. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

Other Utilities and Service Systems

The use of energy and natural gas is an issue which is considered at the City-wide and regional level, and an interstate network of transmission lines and pipelines provide these energy sources to the City. All related project applicants will comply with the CALGreen Code, the City's Green Building Code and obtain will-serve letters from local service providers. The project's incremental increase in the usage of electricity and natural gas would be negligible when compared to the overall energy consumption in the City and the region, as would that of the related projects listed. As such, the project's contribution to energy consumption would not be cumulatively considerable, and cumulative impacts would be less than significant.

Overall, the project's incremental contribution to impacts related to utilities and service systems would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

19. 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?**

Less Than Significant Impact. The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the project is not expected to degrade the quality of the environment. The existing project site is developed with a single-story office building in a heavily urbanized area. The project site does not support sensitive plant or animal species. As discussed above in Section 3, Air Quality, and Section 12, Noise, the project may cause temporary construction-related impacts to air quality and noise. All impacts would be less than significant with implementation of the required mitigation measures. Therefore, impacts would be less than significant in this regard, and no mitigation measures are necessary.

- b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulative 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).**

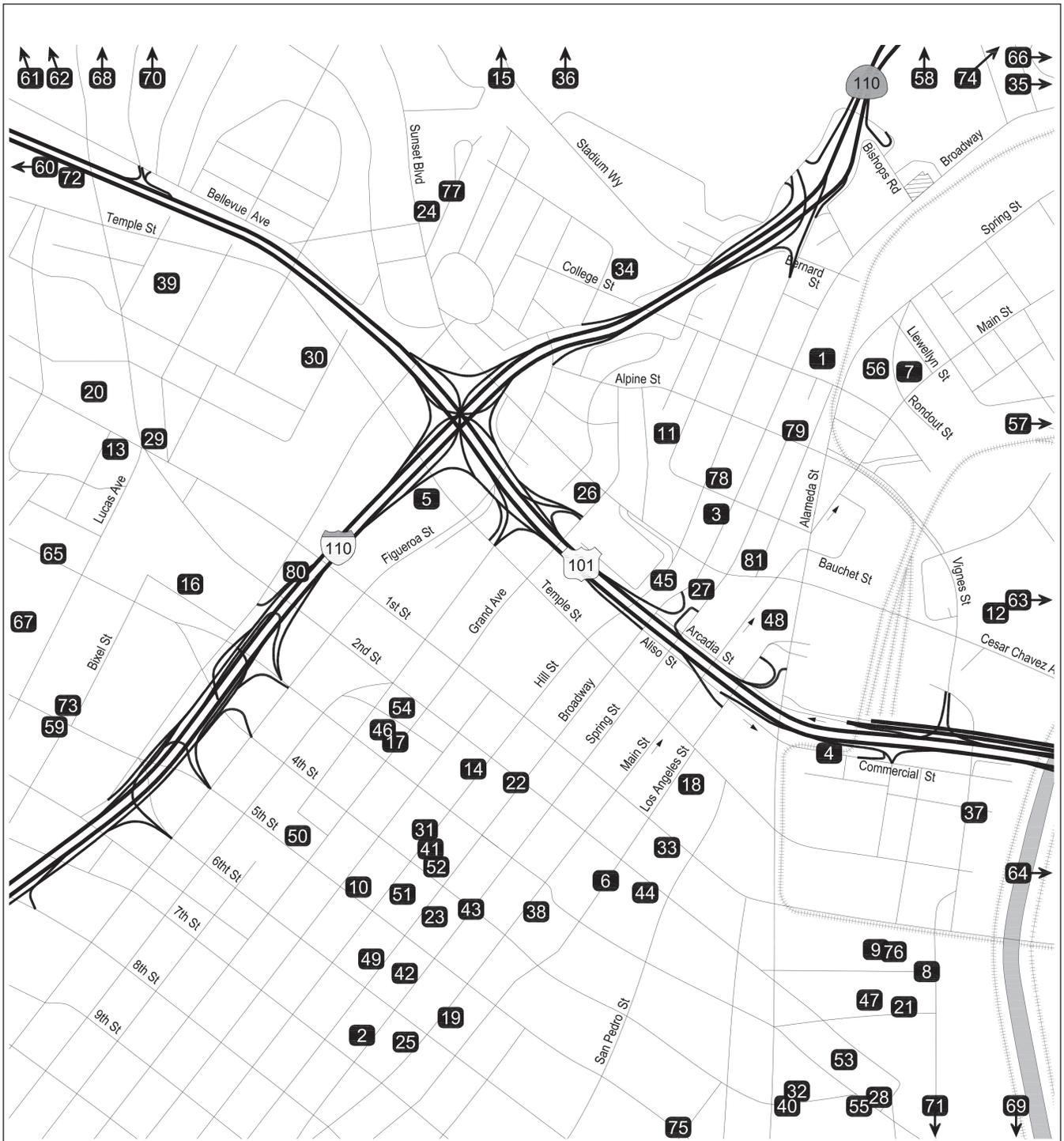
Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the project site, to create impacts that are greater than those of the project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

According to the Traffic Study prepared for the project, there are a total of 81 individual projects, listed below in **Table B-35, Related Projects List**, and shown in **Figure B-2, Related Projects Map**, near the project site that might add traffic to the study intersections. Thus, the analysis of cumulative impacts considers the development of these projects in addition to the project (Gibson Transportation Consulting, Inc., 2016). An evaluation of potential cumulative impacts has been provided under each response in the Checklist above.

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

Less Than Significant Impact. For the purpose of this IS/MND, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. The analysis contained in this IS/MND concludes that the project will not result in significant adverse effects after implementation of mitigation measures.

Based on the preceding environmental analysis, the project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures identified in Sections 1-18 above.



LEGEND

-  Project Site
-  Related Project
-  Not to scale

DPJNF01.EP

SOURCE: Gibson Transportation Consulting, Inc., 2016

1201 N. Broadway

Figure B-2

Related Projects Map



**TABLE B-35
RELATED PROJECTS LIST**

No.	Project	Address	Use	Size	
1	Blossom Plaza	900 N. Broadway	Condominiums	223	du
			Retail	25,000	sf
			Restaurant	15,000	sf
2	Spring St Hotel	633 S Spring Street	Hotel	176	rms
			Restaurant	8,430	sf
			Bar	5,290	sf
3	Jia Apartments	639 N. Broadway	Apartments	280	du
			Retail	22,000	sf
4	Bus Maintenance & Inspection Facility	454 E. Commercial Street	Other	2	acres
5	Da Vinci Apartments	327 N. Fremont Avenue	Apartments	1,200	du
			Retail	25,000	sf
6	Vibiana Lofts (Mixed-Use)	225 S. Los Angeles Street	Condominiums	300	du
			Retail	3,400	sf
7	1101 N Main Condos	1101 N. Main Street	Condominiums	300	du
8	One Santa Fe Mixed Use	300 S. Santa Fe Avenue	Apartments	420	du
			Retail	45,000	sf
			Fast Food	7,500	sf
			Quality Restaurant	7,500	sf
9	Mixed-Use Project (Megatoys)	905 E. 2nd Street	Condominiums	320	du
			Retail	18,712	sf
10	5th & Olive (formerly Park Fifth Project)	427 W. 5th Street	Apartments	615	du
			Restaurants	16,309	sf
11	Apartments	715 N. Yale Street	Apartments	65	du
12	MTA Bus Facility	920 N. Vignes Street	Other	-	-
13	Beverly + Lucas Project	1430 W. Beverly Boulevard	Apartments	153	du
14	Zen Mixed-Use Project (Kawada Tower)	250 S. Hill Street	Condominiums	330	du
			Retail	12,000	sf
15	Barlow Hospital Replacement & Master Plan	2000 Stadium Way	Condominiums	888	du
			Hospital	56	beds
			Retail	15,000	sf
16	LAUSD CLAHS #12	1211 W. Miramar Street	School	500	seats
17	Grand Avenue (Parcel M-2 Rev)	237 S. Grand Avenue	Apartments	412	du
			Retail	449,000	sf
			Other	681,000	sf
18	LA Civic Center Office	150 N. Los Angeles Street	Office	712,500	sf
			Retail	35,000	sf
			Child Care	2,500	sf

No.	Project	Address	Use	Size	
19	Topaz Mixed-Use	534 S. Main Street	Apartments	160	du
			Retail	18,000	sf
			Restaurant	3,500	sf
			Fast Food	3,500	sf
20	Charter High School	1552 W. Rockwood Street	School	600	stu
21	950 E. 3rd St	950 E. 3rd Street	Apartments	635	du
			School	532	stu
			Retail	30,062	sf
22	2012 ISAF Retail/Restaurant	201 S. Broadway	Mixed-Use	27,675	sf
23	Mixed-Use	400 S. Broadway	Apartments	430	du
			Retail	10,000	sf
			Bar	5,000	sf
24	Sunset Everett Mixed-Use	1185 W. Sunset Boulevard	Apartments	204	du
			Retail/Restaurant	11,334	sf
			Single-Family Homes	6	du
25	Mixed-Use	601 S. Main Street	Condominiums	452	du
			Retail	25,000	sf
26	Mixed-Use	700 W. Cesar Chavez Avenue	Apartments	300	du
			Retail	8,000	sf
27	La Plaza Cultura Village	527 N. Spring Street	Apartments	345	du
			Retail	44,000	sf
			Restaurant	11,000	sf
28	Mixed-Use (Coca Cola)	963 E. 4th Street	Office	75,000	sf
			Retail	25,000	sf
			Restaurant	20,000	sf
29	Mixed-Use	1335 W. 1st Street	Apartments	101	du
			Retail	3,514	sf
30	Residential	401 N. Boylston Street	Apartments	101	du
31	Mixed-Use	340 S. Hill Street	Apartments	428	du
			Retail	6,700	sf
32	Mixed-Use	360 S. Alameda Street	Apartments	55	du
			Restaurant	2,500	sf
			Creative Office	6,300	sf
33	Apartments	118 S Astronaut e.s. Onizuka Street	Apartments	77	du
34	Kaiser Victor Heights	765 W College Street	Office	10,000	sf
35	Charter School	211 S Avenue 20	High School	263	stu
			Middle School	74	stu
36	Stadium Way & Chavez Ravine Apartments	959 E Stadium Way	Apartments	158	du
37	Metro Emergency Security Operations Center	410 N Center Street	Office	110,000	sf

No.	Project	Address	Use	Size	
38	Medallion Phase 2	300 S Main Street	Restaurant	27,780	sf
			Retail	5,190	sf
39	Apartments	340 N Patton Street	Apartments	43	du
40	400 S Alameda Street	400 S Alameda Street	Hotel	66	rm
			Restaurant	2,130	sf
			Retail	840	sf
41	Beacon Tower	338 S Hill Street	Apartments	428	du
			Retail	2,900	sf
42	Spring St Apartments	525 S Spring Street	Apartments	360	du
43	Title Insurance	400 S Spring Street	Apartments	215	du
			Retail	60,000	sf
44	Wakaba LA	232 E 2nd Street	Apartments	240	du
			Retail	16,000	sf
45	La Plaza Cultural Village	430 N Hill Street	Apartments	345	du
			Retail	55,000	sf
46	The Grand	225 S Grand Avenue	Apartments	380	du
			Hotel	308	rm
47	Hauser Wirth & Schimmel Gallery	901 E 3rd Street	Art Gallery	100,000	sf
48	Italian American Museum	125 Paseo de la Plaza	Museum	7,140	sf
49	537 S Broadway	537 S Broadway	Creative Office	45,000	sf
50	Skyspace at US Bank Tower	633 W 5th Street	Observation Deck	--	sf
51	Clark Hotel	426 S Hill Street	Hotel	348	rms
52	353 S Broadway	353 S Broadway	Office	29,652	sf
53	Arts District Brewing Company	828 Traction Avenue	Bar	17,000	sf
54	The Broad	221 S Grand Avenue	Museum	120,000	sf
55	Resident	428 S Hewitt Street	Bar/Live Music Venue	5,500	sf
56	College Station Mixed-Use	129 W College Street	Apartments	770	du
			Grocery Store	37,520	sf
			Retail	5,870	sf
			Restaurant	8,000	sf
57	USC Health Science Campus	1510 N San Pablo Street	Medical Office	120,000	sf
			Research & Development	465,000	sf
58	Taylor Yard Village (Mixed-Use)	1555 N San Fernando Road	Apartments	164	du
			Condominiums	290	du
			Retail	25,000	sf
59	Bixel & Lucas	1102 W 6th Street	Apartments	648	du
			Retail	39,996	sf
60	Mixed-Use	1924 W Temple Street	Condominiums	205	du
			Apartments	46	du
			Retail	19,103	sf

No.	Project	Address	Use	Size	
61	Sunset Flats (Mixed-Use)	2225 W Sunset Boulevard	Condominiums	65	du
			Retail	7,775	sf
			Restaurant	7,775	sf
62	Restaurant/Theater	2139 W Sunset Boulevard	Restaurant	5,979	sf
63	1902-1901 Marengo Mixed-Use	1902 E Marengo Street	Retail	4,415	sf
			Restaurant	6,000	sf
			Medical Office	16,820	sf
64	Medical Office Expansion	1828 E Cesar Chavez Street	Medical Office	32,300	sf
65	Mixed-Use	1435 W 3rd Street	Apartments	122	du
			Retail	5,000	sf
66	SPR-Medical Office & Retail	3303 N Broadway	Medical Office	47,300	sf
67	Residential	459 S Hartford Avenue	Apartments	94	du
68	Restaurant	1455 N Alvarado Street	Restaurant	7,948	sf
69	Office	540 S Santa Fe Avenue	Office	65,812	sf
70	Glendale Blvd Apts	1750 N Glendale Boulevard	Apartments	70	du
71	Restaurant	500 S Mateo Street	Restaurant	12,882	sf
72	LA Hotel	1625 W Palo Alto Street	Hotel	89	rms
73	Sapphire Mixed-Use (Revised)	1111 W 6th Street	Apartments	369	du
			Retail	18,600	sf
			Restaurant	3,400	sf
74	Mixed-Use	167 W Avenue 34	Apartments	410	du
			Retail	10,000	sf
			Office	30,000	sf
75	Mixed-Use	719 E 5th Street	Apartments	160	du
			Retail	7,500	sf
76	Mixed-Use Project	929 E 2nd Street	Entertainment	104,912	sf
77	Everett St. (1013) Project	1013 N Everett Street	Apartments	49	du
78	Hill Mixed Use Project	708 N Hill Street	Apartments	162	du
			Retail	5,000	sf
79	Alpine Mixed-Use	211 W Alpine Street	Apartments	122	du
			Retail	7,500	sf
80	Beaudry Ave & 2nd St Mixed-Use Project	130 S Beaudry Avenue	Apartments	230	du
			Other	9,000	sf
81	643 - 655 N Spring St Mixed-Use Project	643-655 N Spring Street	Apartments	234	du
			Other	15,200	sf

SOURCE: Gibson Transportation Inc., October 2016

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