LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

3822 South Figueroa Project

Case Number: ENV-2024-6372-EIR

Project Location: 3822-3828 South Figueroa Street, 3801-3833 ½ South Flower Drive, and 468-470 West 39th Street, Los Angeles, California 90037

Community Plan Area: South Los Angeles

Council District: 9 — Curren D. Price Jr.

Project Description: The 3822 South Figueroa Project (Project) proposes a new seven-story mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households); and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet, and a total floor area of 252,148 square feet on a 62,989 square-foot (1.4-acre) site, for a Floor Area Ratio (FAR) of 4:1. The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of surface parking areas.

PREPARED FOR:

The City of Los Angeles, Department of City Planning

PREPARED BY:

Kimley-Horn and Associates, Inc.

APPLICANT:

Red Penguins QOZB, LLC

April 2025

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1 INTRODUCTION

An application for the proposed 3822 South Figueroa Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (City), as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City has determined to use Appendix G of the State CEQA Guidelines as the thresholds of significance for the Project unless another threshold of significance is expressly identified in this document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (as part of the forthcoming EIR) is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor a Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website.

1.3.1 Initial Study

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

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

1.3.2 Draft EIR

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

impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process and may certify the Final EIR and approve the Project. In addition, when approving a Project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant impact identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**3822 South Figueroa**
ENVIRONMENTAL CASE NO.	ENV-2024-6372-EIR
RELATED CASES	CPC-2024-6371-DB-PR-HCA; VTT-84555-CN

PROJECT LOCATION	3822-3828 South Figueroa Street, 3801-3833 ½ South Flower Drive, and 468-470 West 39th Street, Los Angeles, California 90037
COMMUNITY PLAN AREA	South Los Angeles
GENERAL PLAN DESIGNATION	Community Commercial
ZONING	C2-1L and RD1.5-1
COUNCIL DISTRICT	9

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	**Tamar Gharibian**
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APPLICANT	**Red Penguins QOZB, LLC**
ADDRESS	6789 Quail Hill Parkway, Unit 225, Irvine, CA, 92603
PHONE NUMBER	(310) 595-3208

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☒ Greenhouse Gas Emissions	☒ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology / Water Quality	☒ Transportation
☐ Biological Resources	☒ Land Use / Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Energy	☒ Noise	☐ Wildfire
☐ Geology / Soils	☐ Population / Housing	☒ Mandatory Findings of Significance

DETERMINATION

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.

Tamar Gharibian, Planning Assistant	April 2, 2025
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significant.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

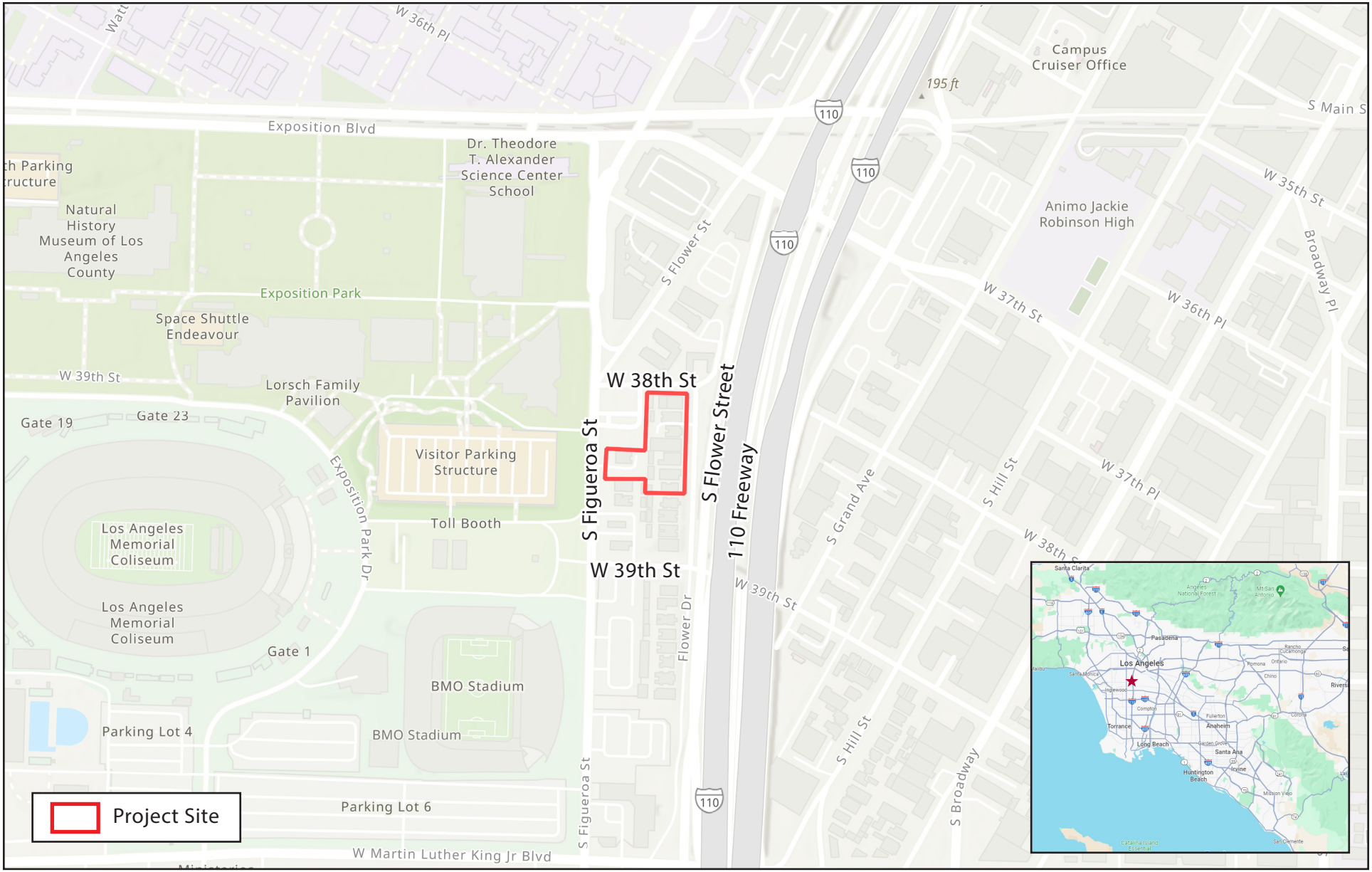
The Project proposes a new seven-story, mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households (15 percent), 22 units for Very Low-Income households (14 percent), and four units for Extremely Low-Income households (two percent)); and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet, and a total floor area of 252,148 square feet on a 62,989 square-foot (1.4-acre) Project Site (Project Site), for a FAR of 4:1. The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of surface parking areas. The Project's 209 units would exceed the number of existing housing units that would be removed by the Project, and would provide a net increase of 158 units on the Project Site consisting of 34 studios, 43 one-bedroom units, 45 two-bedroom units, 34 three-bedroom units, and 53 four-unit bedroom units. Additionally, the Project would include 23,127 square feet of open space consisting of private patios, courtyard areas, roof decks, and indoor amenities for residents, as well as 34 residential parking spaces and six commercial parking spaces at the ground level.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The 1.4-acre Project Site is located directly east of Exposition Park at 3822-3828 South Figueroa Street; 3801-3833 ½ South Flower Drive; and 468-470 West 39th Street, within an urbanized area located approximately two miles southwest of Downtown Los Angeles within the City's South Los Angeles Community Plan area, as shown in **Figure 1, Regional Map**. The Project Site is generally bounded by South Figueroa Street to the west, West 38th Street to the north, South Flower Drive and the Interstate 110 (I-110) freeway to the east, and existing residential uses and an auto servicing center to the south.

Local access to the Project Site is provided by South Figueroa Street located west of the Project Site, and primary regional access is provided by the I-110 freeway located directly east of South Flower Drive and Interstate 10 (I-10) located 1.6 miles north of the Project Site. The Project is served by two transit agencies. The Los Angeles County Metropolitan Transportation Authority (Metro) E (Expo) line is located 0.3 miles north of the Project Site on Exposition Boulevard and provides service to Santa Monica and Downtown Los Angeles. Metro also operates multiple local and express bus lines that serve the Project Site, including Line 2, 81, and 550 which travel north/west along South Figueroa Street. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast – Clockwise and Counterclockwise service routes.



SOURCE: ESRI, 2025

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FIGURE 1: Regional Map

3822 SOUTH FIGUEROA PROJECT

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3.2.2 Existing Conditions

Figure 2, Aerial of the Project Site, on page 12 provides an aerial photograph of the Project Site and its surrounding properties, including the existing student housing center, Hub Los Angeles Coliseum, as well as the residential uses and auto servicing center located immediately south of the Project Site. These buildings are not a part of the Project or the Project Site, and therefore, would remain in their current condition.

As shown in **Figure 2**, the Project Site is currently developed with seven, two-story multi-family residential buildings that are part of the Flower Drive Historic District along Flower Drive, and a two-story multi-family residential building and surface parking along Figueroa Street. Existing development on the site totals 51 residential units and 26,597 square feet of floor area.

The Project Site is relatively flat with limited ornamental landscaping. Existing landscaping within the Project Site includes a total of 14 on-site trees and nine street trees located within the public right-of-way surrounding the Project Site. Existing on-site trees include eight species such as Mexican Fan Palm), Spinless Yucca, and Queen Palm. None of the on-site trees or street trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[2,3]

The Project Site has a General Plan Land Use designation of Community Commercial within the South Los Angeles Community Plan area, and is zoned as C2-1L (Commercial, Height District 1L) along South Figueroa Street and RD1.5-1 (Residential Density Multiple Dwelling Zone, Height District 1) along South Flower Drive. The C2 Zone is an expressly corresponding zone to the Project Site's Community Commercial land use designation, although the RD1.5 Zone is not. The C2 Zone includes various retail, restaurant, and residential uses by right.

Specific to the Project, the C2 Zone expressly permits uses including multiple dwellings, apartment houses, and restaurant uses. The "1L" in the Project's zoning designation refers to the Project Site's location in Height District No. 1L. All uses located in the C2 Zone and within Height District No. 1L are restricted to a maximum FAR of 1.5:1, a maximum of 75 feet in height, and a maximum of six stories. The C2 Zone imposes no front yard setback requirements, although it imposes a side yard requirement of at least five feet with an additional foot per story above the second story for buildings more than two stories in height (with a set maximum of 16 feet), and a rear yard requirement of at least 15 feet, with an additional foot per story above the third story (with a set maximum of 20 feet). The RD1.5 Zone includes residential uses, community centers and parks, and accessory building uses by right. Specific to the Project, the RD1.5 Zone expressly permits multiple dwellings and apartment uses. The "1" in the Project's zoning designation refers to the Project Site's location in Height District No. 1. All uses located in the RD1.5 Zone and within Height District No. 1 are restricted to a maximum FAR of 3:1 and a maximum of 45 feet in height. The RD1.5 Zone imposes a 15-foot front yard setback requirement, a side yard requirement of at least five feet with an additional foot for every story above the second story for buildings more than two stories in height (with a set maximum of 16 feet), and a 15-foot rear yard requirement.

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[2] Tree Assessment Report For: 3822 Figueroa, Arborgate Consulting, Inc., May 21, 2024.See Appendix A of this Initial Study.

[3] Pursuant to Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of the tree planting program.

The Project Site is located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code (PRC) Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." TPAs are defined as areas within 0.5 miles of a major transit stop that are existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted Transportation Improvement Program (TIP) (PRC, Section 21099.) The Project qualifies as a mixed-use residential Project on an infill site located within a TPA, as the Project Site is located within 0.5 miles of several major Metro bus stops. Thus, in accordance with SB 743 and the City's Zoning Information file (ZI) No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone pursuant to the City's ZI No. 2374, the greater Downtown Housing Incentive Area pursuant to the City's ZI No. 2385, the Exposition/University Park Redevelopment Project Area pursuant to the City's ZI No. 2488, the Freeway Adjacent Advisory Notice of Sensitive Uses pursuant to the City's ZI No. 2427, the Housing Element Inventory of Sites pursuant to the City's ZI No. 2512, the South Los Angeles Alcohol Sales Specific Plan pursuant to the City's ZI No. 1231, and the Figueroa Street Corridor, Planned Development pursuant to the South Los Angeles Community Plan. The Project is also within the Neighborhood Stabilization Ordinance: North University Park- Exposition Park-West Adams (NSO) pursuant to the City's ZI No. 2397. However, the NSO overlay is not applicable to projects with frontage on S. Figueroa Street.

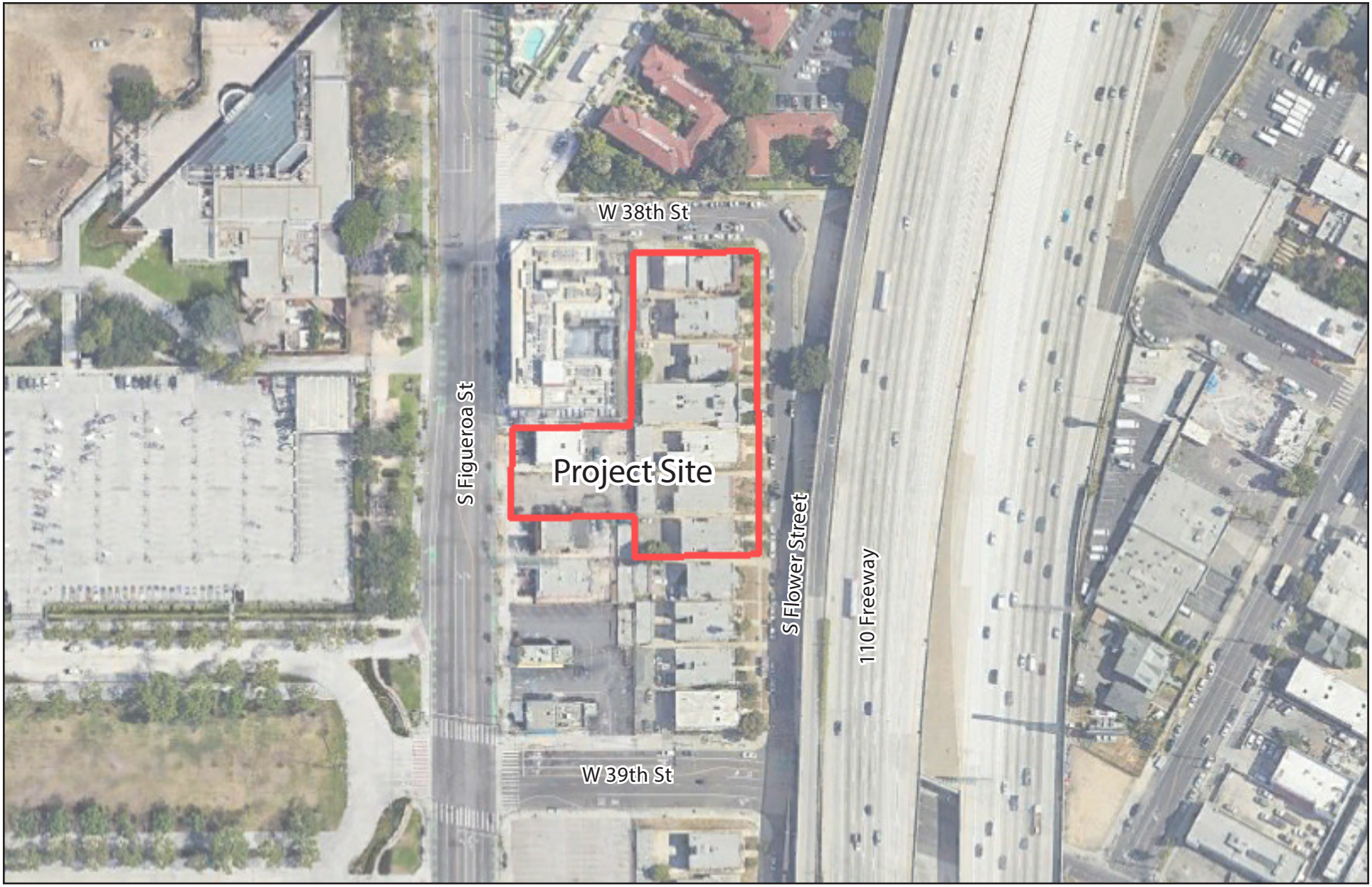

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FIGURE 2: Aerial of the Project Site

3822 SOUTH FIGUEROA PROJECT

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3.2.3 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential, and public facilities uses. The surrounding properties are generally zoned C2-1L, RD1.5-1, and PF-1, which are generally consistent with the zoning on the Project Site. Bordering the Project Site to the south are two, two-story multi-family units, surface parking, and commercial uses (currently an auto servicing center) which are zoned C2-1L and RD1.5-1. Further south across West 39th Street is the mixed-use 3900 South Figueroa Street project currently under construction, that would construct student housing, affordable housing, and ground floor retail and restaurant uses. The western portion of the Project Site fronting South Figueroa Street is bordered to the north by the seven-story "Hub Los Angeles Coliseum," a private student housing development that includes ground floor retail, multi-family units, and various residential amenities.

Exposition Park is located west of the Project Site across South Figueroa Street. Exposition Park includes the Los Angeles Memorial Coliseum, the BMO Stadium, the California Science Center, the Dr. Theodore T. Alexander Jr. Science Center School, the California African American Museum, the Los Angeles County Natural History Museum, the Exposition Park Rose Garden, the Wallis Annenberg Building, the Expo Center, and the Lucas Museum of Narrative Art which is currently under construction. To the north of the Project Site across West 38th Street are commercial and residential developments including the University of Southern California's (USC) University Park Campus and Garrett Gardens apartment complex. To the east of the Project Site is the I-110 freeway.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As discussed above and summarized in **Table 1: Summary of Existing and Proposed Floor Area** on page 14, the Project proposes a new seven-story, mixed-use building comprised of 209 dwelling units (including 16 units for Low-Income households (15 percent), 22 units for Very Low-Income households (14 percent), and four units for Extremely Low-Income households (two percent)); and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet, and a total floor area of 252,148 square feet on a 62,989 square-foot (1.4-acre) Project Site, for a FAR of 4:1. The Project would include 23,127 square feet of open space consisting of private patios, courtyard areas, roof decks, and indoor amenities for residents, as well as 34 residential parking spaces and six commercial parking spaces at the ground level. The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of surface parking areas.

Table 1: Summary of Existing and Proposed Floor Area

Use	Existing (sf)	Demolition (sf)[b]	Proposed New Construction (sf)	Total Project Floor Area (sf)
Residential [a]	26,597	26,597	249,443	249,443
Retail and restaurant	0	0	2,705	2,705
Total	**26,597**	**26,597**	**252,148**	**252,148**

sf = square feet

a Inclusive of affordable housing units. Thirty-two (32) units would be reserved for Very Low-Income households, and ten units would be reserved for Low-Income households.

b Demolition of structures would be 26,597 sf. Total demolition including structures, driveways and pavement is 31,400 sf.

Source: KTGY, 2024.

As shown in **Figure 3**, **Conceptual Site Plan** on page 15, and **Table 2: Project Development Program** on page 18, the 209 residential units would consist of 34 studios, 43 one-bedroom units, 45 two-bedroom units, 34 three-bedroom units, and 53 four-unit bedroom units. The Project would include four units (two percent) for Extremely Low Income Households, 22 units (14 percent) for Very Low-Income households and 16 units (15 percent) for Low-Income households.

The ground floor of the Project would include a main entry lobby for the residential uses and approximately 2,705 square feet of retail and restaurant uses along South Figueroa Street. A secondary residential lobby would be located along West 38th street adjacent to a small dog washroom available for residents. A large internal courtyard as well as an at-grade, wrapped parking garage with long-term bicycle parking inclusive of a small 100 sf workspace for bicycle repairs and maintenance, and various mechanical rooms would also be located on the ground floor. Residential units would also be located on the ground floor. The second through seventh floors of the building primarily contain residential units and amenities.

In addition to residential units, the second floor would also contain three internal open space courtyards with lounging and seating areas and a pool, as well as a fitness room, a club and game room, and a co-working space. The third floor through sixth floor would include a lobby area and a study room in addition to residential units. The seventh floor includes residential units as well as residential amenities including a roof deck area which would include a lounge an additional to with BBQ areas, game lawn, lounge chairs, and umbrellas.

As shown in **Figure 4, Building Sections, West and South Elevations** and **Figure 5, Building Sections, East and North Elevations** on pages 16 and 17, respectively, the Project would include 40 vehicle parking spaces including 34 for residents and six for visitors in a wrapped ground floor parking area. The Project would also provide 128 long-term bicycle spaces and 14 short-term bicycle spaces for residents, and two long-term bicycle spaces and two short-term bicycle spaces for visitors.

FIGURE 3: Conceptual Site Plan

3822 SOUTH FIGUEROA PROJECT

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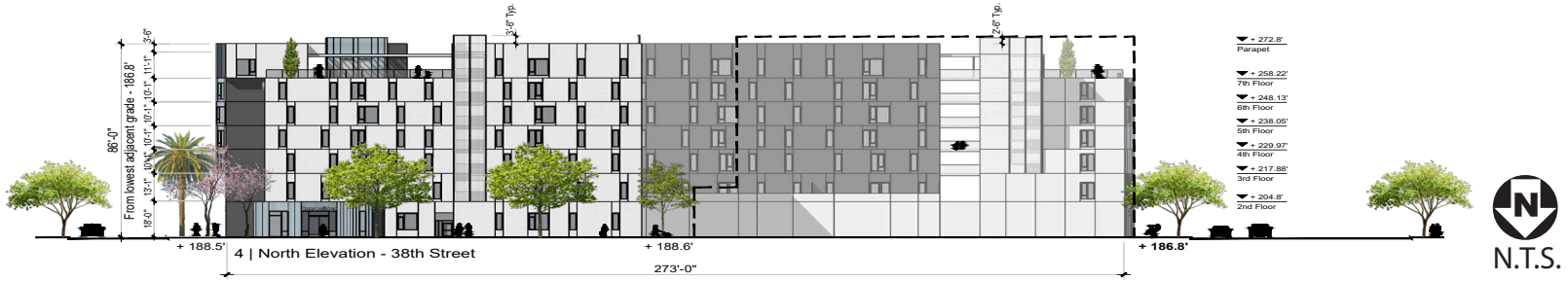
FIGURE 4: Building Sections, West and South Elevations



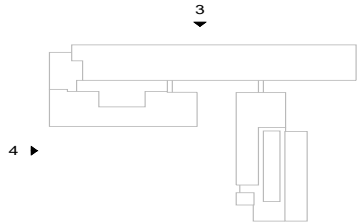


FIGURE 5: Building Sections, East and North Elevations

Table 2: Project Development Program

Project Component	Proposed
Residential [a]	
Studio	34 units
One-Bedroom	43 units
Two-Bedroom	45 units
Three-Bedroom	34 units
Four-Bedroom	53 units
Total	209 units (249,443 sf)
Affordable and Market-Rate RSO Units	
Extremely Low Income	4 units
Very Low Income	22 units
Low Income	16 units
Market-Rate RSO	12 units
Total	42 affordable units
Retail and Restaurant	
Total	2,705 sf
Open Space	
Private Open Space	300 sf
Common Open Space	22,827 sf
Total	23,127 sf
Parking [b]	
Residential	34 spaces
Commercial	6 spaces
Total	40 spaces
Bicycle Parking	
Long-Term	127 spaces
Short-Term	13 spaces
Total	130 spaces
FAR	4.2:1
Height	86 feet (7 stories)
Total Floor Area	**252,148 sf**

sf = square feet

[a] *Inclusive of affordable housing units provided in table.*

[b] *Per AB 2097, the Project has no minimum parking requirement.*

Source: KTGY, 2024.

3.3.2 Design and Architecture

As shown **in Figure 6**, **Conceptual Rendering - View of Main Entry on South Figueroa Street**, **Figure 7**, **Conceptual Rendering - Roof Deck View Towards USC**, and **Figure 8, Conceptual Rendering - Freeway View of South Flower Street Elevation** on pages 20 through 22, the Project has been designed in a contemporary architectural style that is compatible with existing and proposed development in the surrounding area. The Project's contemporary architectural design complements recent and under-construction Project within the surrounding area such as the BMO Stadium, the HUB Los Angeles apartment complex, and the Lucas Museum of Narrative Art. The massing on this façade steps back from the existing student housing building to the north, to both reduce massing along South Figueroa Street and provide for privacy between buildings. The ground floor level along South Figueroa Street would activate the street level with the inclusion of ground floor retail and restaurant l uses. Floor-to-ceiling windows at the ground level along South Figueroa Street would further activate the street and provide visual transparency into the Project Site.

The Project facades along South Flower Street (facing the I-110 freeway), West 38th Street, and all internal facades feature a cohesive design theme with varied materiality and color and angled bay windows to add building articulation and create visual interest. The Project's seventh floor roof decks provide views of the USC campus and nearby urban landscape as well as distant views of the downtown Los Angeles skyline. Exterior building materials would include white and grey stucco, with metal accents and perforated metal panels.

SOURCE: KGTY, 2025

FIGURE 6: Conceptual Rendering - View of Main Entry on South Figueroa Street

SOURCE: KGTY, 2025

N.T.S.

FIGURE 7: Conceptual Rendering - Roof Deck View Towards USC

3822 SOUTH FIGUEROA PROJECT

Kimley»Horn

SOURCE: KGTY, 2025

FIGURE 8: Conceptual Rendering - Freeway View of South Flower Street Elevation

3822 SOUTH FIGUEROA PROJECT

Kimley»Horn

3.3.3 Open Space and Landscaping

As shown in **Figure 9**, **Conceptual Landscape Plan, Figure 10**, **Level 1 Landscape Plan**, **Figure 11**, **Level 2 Landscape Plan** and **Figure 12**, **Level 7 View Deck Plan,** open space and landscaping would be provided in accordance with the City of Angeles Municipal Code (LAMC) Section 12.21 G, inclusive of a Density Bonus open space reduction. The Project would incorporate accessible indoor and outdoor common open space on the ground floor, second floor, and seventh floor, as well as private open space for Project residents and guests. The Project would provide 23,127 square feet of open space, which includes 287 square feet of non-required open space that would contain amenities such as courtyards, pool, roof decks, recreation rooms, and private patios. Open space areas would be accessible from South Figueroa Street, West 38th Street, and from the interior of the Project Site. The landscape design would emphasize native and drought-tolerant shrubs and grasses and ornamental trees. The Project would provide 54 new trees on the Project Site (one tree provided for every four units, per LAMC Section 12.21 G).

There are a total of 23 trees on the Project Site, including nine street trees. All of the street trees are proposed to be retained, and the remaining 14 on-site trees would be removed. If any street trees ultimately require removal per the direction of the Los Angeles Urban Forestry Division, they will be replaced at a 2:1 ratio per current City policy. Pursuant to LAMC Section 12.21 G and Ordinance No. 153500, the Project would provide 54 trees, including 34 trees on the ground floor (23 on the Project Site and 11 new street trees), 17 trees on the second floor, and three trees on the seventh floor.

3.3.4 Access, Circulation, and Parking

Vehicular Access and Parking

The Project would include a new driveway with access along South Flower Drive that would provide ingress and egress into the wrapped at-grade parking garage. The Project would include 40 vehicle spaces that would consist of 34 parking spaces for residents and six parking spaces for visitors. Pursuant to Ordinance No. 187,719 and Ordinance No. 186,485, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) with ten percent of the space equipped with EV Charging Stations (EVCS).

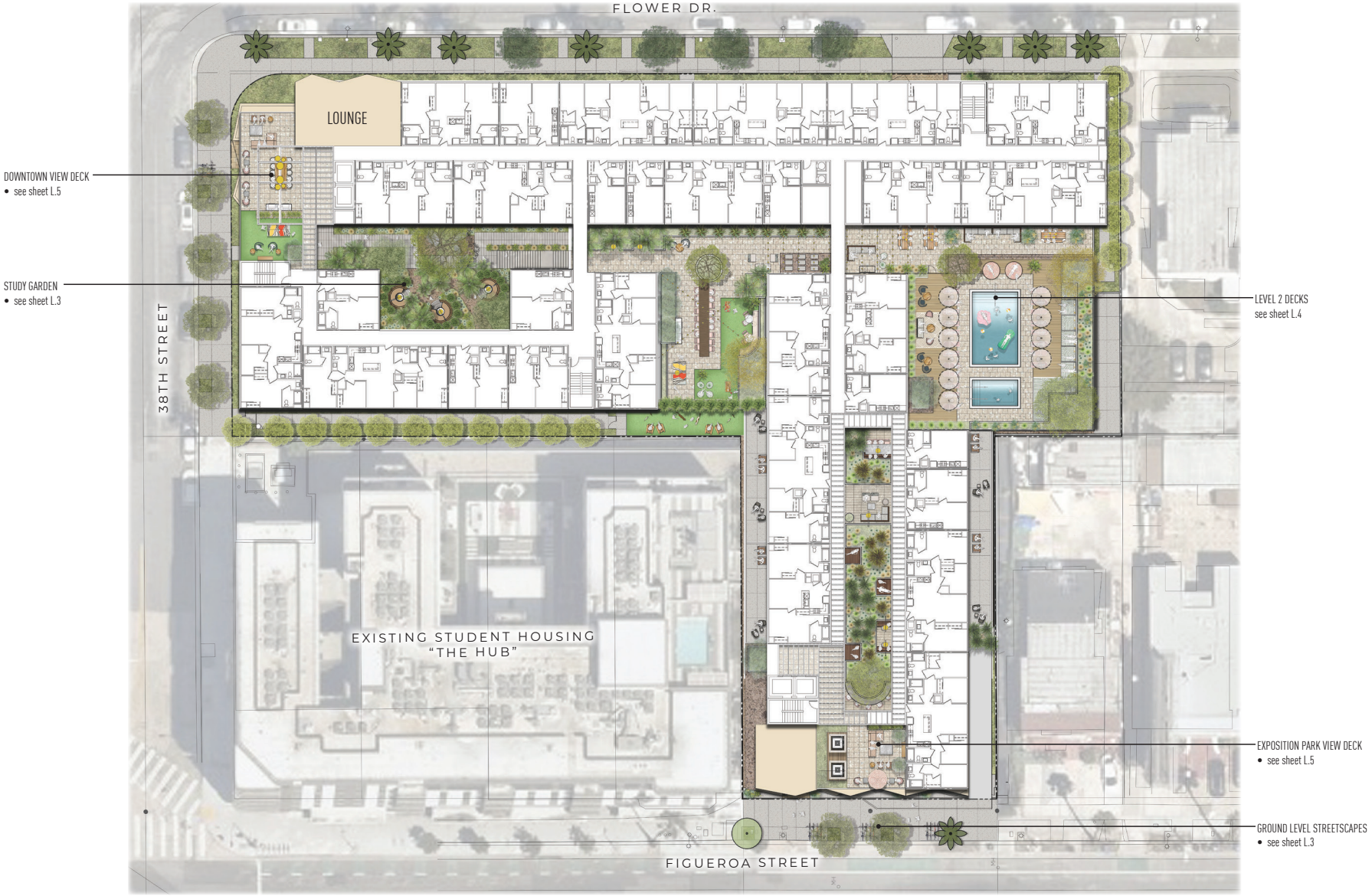
The parking garage would be fully screened from view on all sides due to its wrapped design.

Bicycle Access and Parking

The Project would provide short- and long-term bicycle spaces for both residential and commercial uses. A total of 16 short term-residential and commercial bicycle spaces would be located on South Figueroa Street and West 38th Street in bike racks proposed to be located in the public right-of-way. In addition, 128 long-term residential and commercial bicycle spaces would be located on the ground floor of the Project Site within the at-grade parking garage with access from the main entrance lobby and parking garage.

Pedestrian Access

Residential access would be provided from the ground floor to the main lobby along South Figueroa Street and a secondary lobby along West 38th Street. Retail and restaurant access for pedestrians would be provided from the ground floor along South Figueroa Street.



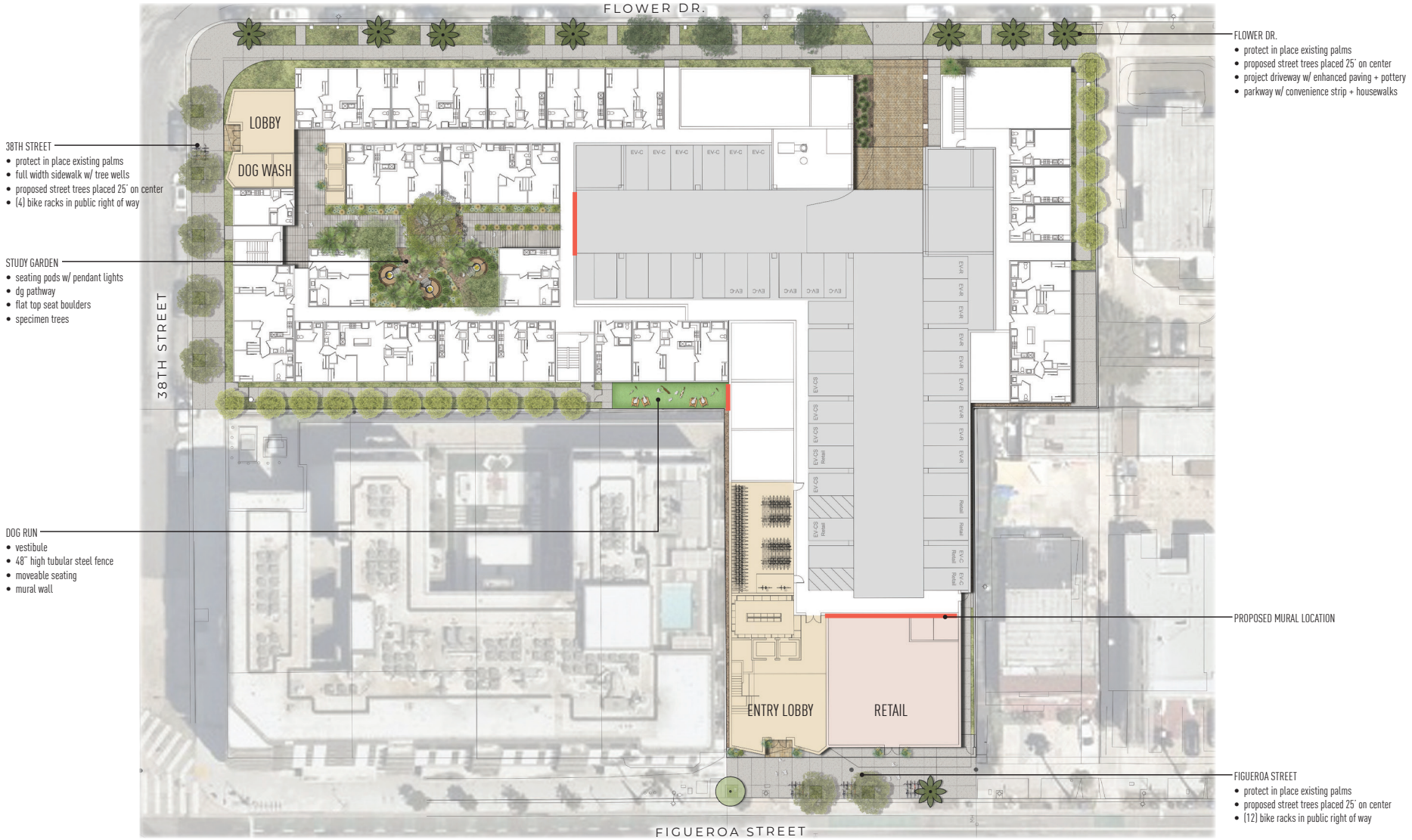
SOURCE: KGTY, 2025

N.T.S.

FIGURE 9: Conceptual Landscape Plan

3822 SOUTH FIGUEROA PROJECT

Kimley»Horn



SOURCE: KGTY, 2025

N.T.S.

FIGURE 10: Level 1 Landscape Plan

3822 SOUTH FIGUEROA PROJECT

Kimley»Horn

SOURCE: KGTY, 2025

N.T.S.

FIGURE 11: Level 2 Landscape Plan

3822 SOUTH FIGUEROA PROJECT

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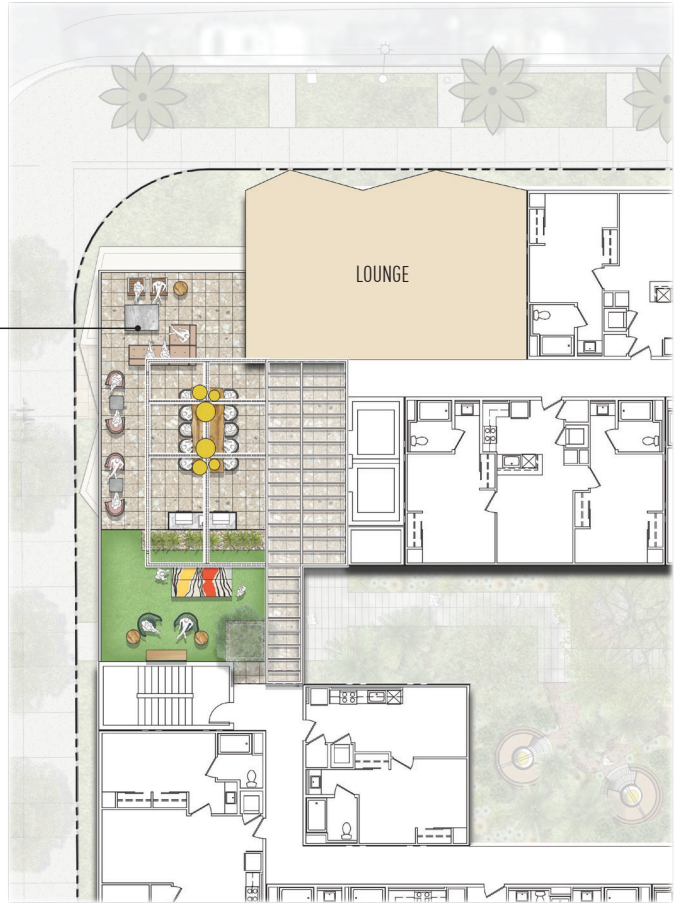
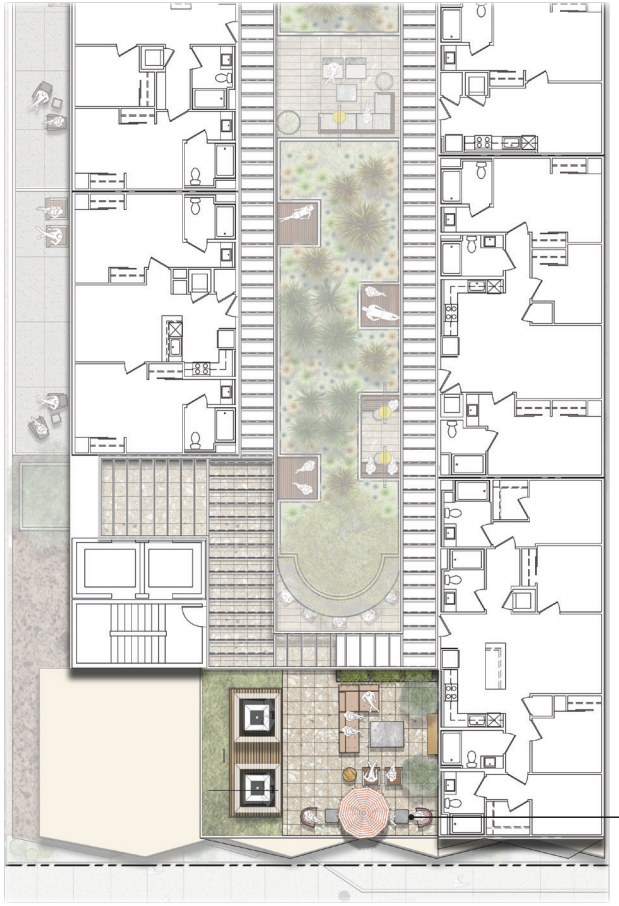
ROOF DECK
- built-in bbqs
- dining table w/ pendant lighting on metal trame - no shading proposed
- lounge furniture
- game lawn
- tv wall
- pottery
- views to Downtown LA + Hollywood Hills



DOWNTOWN VIEW DECK



EXPOSITION PARK VIEW DECK

ROOF DECK
- lounge furniture
- day beds
- umbrellas
- pottery
- green roof tray planting
- views to Exposition Park, BMO Stadium + the Los Angeles Coliseum

SOURCE: KGTY, 2024

N.T.S.

FIGURE 12: Level 7 View Deck Plan

3822 SOUTH FIGUEROA PROJECT

Kimley»Horn

3.3.5 Lighting and Signage

Lighting for the Project is intended to minimize light trespass and glare from the Project Site onto adjacent properties and to provide safety and nighttime visibility through shielded, focused, and directed illumination. Proposed signage along South Figueroa Street includes mounted and backlist signage over the main lobby entry doors and at the top of the building facing both south and north. Commercial signage would be mounted to the canopy awning above the commercial glass front and would be illuminated from the interior. Additional lighting includes planter uplighting and trellis-mounted down light for each roof deck, building mounted emergency lighting along South Flower Street and at the points for ingress and egress around the building perimeter, and interior courtyard lighting.

3.3.6 Site Security

During construction of the Project, the Project Site would be fence, gated, and monitored via surveillance cameras, on-site security, or security drive-by patrols. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. All resident building entries would only be accessible through key fob access, either from a door into the building or a gate into a side yard. All side yards would be fenced in and secured from public access. A vehicular gate would be set back from the parking entryway along South Flower Drive and would be closed after commercial business hours.

3.3.7 Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project would emphasize energy and water conservation, which would be achieved through the use of energy-efficient heating, ventilation, gray water system for irrigation, air conditioning (HVAC) and lighting systems, ENERGY STAR® appliances, and low-flow plumbing fixtures. The Project would reserve 15 percent of roof area for solar use.

In addition, of the 34 residential parking spaces, the Project would provide 30 percent for EV capable uses (11 spaces), 25 percent would be EV Ready (nine spaces), and ten percent would include EVCS (four spaces). For commercial parking spaces, 30 percent would be EV Capable (two spaces) and 20 percent would include an EVCS (two spaces).

3.3.8 Anticipated Construction Schedule

Construction of the Protect is anticipated to begin in the first quarter of 2027 and end in the last quarter of 2029. Opening year of the Project would be 2030. Demolition of existing uses is estimated to include 26,597 square feet of existing residential uses.[4] Grading activities would include cut and fill with approximately 8,310 cubic yards (CY) exported from the Project Site. Construction hours would occur in accordance with the LAMC requirements, which prohibit 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 or

[4] Demolition of existing structures would be 26,597 square feet of residential uses. Total demolition including structures, driveways and pavement is 31,400 square feet.

holidays. Parking for the construction workers would be provided on the Project Site or will be leased from nearby off-site parking areas.

3.4 REQUESTED PERMITS AND APPROVALS

The anticipated requests for approval of the Project are listed below. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to LAMC Section 12.22 A.25 and California Government Code Section 65915, a **Density Bonus Compliance Review** for a 32 percent density bonus for a Housing Development Project setting aside two percent (four units) for Extremely Low Income households and 14 percent (22 units) for Very Low Income households, for a period of 55 years, including four Incentives and four Waivers of Development Standards, as follows:

   a. An On-Menu Incentive to allow averaging of floor area ratio, density, parking, and open space over the Project Site, and permit vehicular access from a less restrictive zone to a more restrictive zone.

   b. An On-Menu Incentive to allow a 19 percent decrease in the total amount of required open space, from 28,550 square feet to 23,127 square feet.

   c. An Off-Menu Incentive to allow a FAR of 4:1 across the Project Site in lieu of the otherwise maximum permitted FAR of 3:1 in the RD1.5 Zone and 1.5:1 in the C2 Zone.

   d. An Off-Menu Incentive to allow a height increase across the Project Site to 86 feet and seven stories, in lieu of the maximum permitted 75 feet and six stories in the C2-1L Zone, and 45 feet in RD1.5-1 Zone.

   e. A Waiver of Development Standard to reduce the front setback along West 38th Street from 15 feet to 6 inches.

   f. A Waiver of Development Standard to reduce the side yard setback along South Flower Drive from 10 feet to 0 feet.

   g. A Waiver of Development Standard to reduce the side yard setback along the western interior property line from 10 feet to 2 feet.

   h. A Waiver of Development Standard to reduce the rear yard setback along the southern interior property line from 15 feet to 5 feet, 1 inch.

2. Pursuant to LAMC Section 16.05, a Project Review for a project resulting in an increase of 50 or more dwelling units; and

3. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map (VTTM No. 84555-CN) for the merger and re-subdivision of nine lots into one ground lot for residential and commercial condominium purposes; and a haul route for 8,310 cubic yards of exported soil.

3.5 RESPONSIBLE & TRUSTEE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration (State CEQA

Guidelines Section 15381). No responsible agencies have been identified for the Project. A Trustee Agency under CEQA is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (State CEQA Guidelines Section 15386). No trustee agencies have been identified for this Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or an appliable regional transportation plan." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval o 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21099 defines an "infill site" as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." [5]

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is a mixed-use residential project located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located in a highly urbanized area of the City of Los Angeles (City) and includes lots located within this urban area that have been previously developed. In addition, the Project Site is also located within a TPA because it is located within 0.5 mile of an existing "major transit stop". In particular, the Project Site is located 0.3 miles south of the Expo Park/USC station of the Metro E (Expo) rail line as well as within 300 feet from the bus stops for Metro Lines 2, 81, and 550 at the intersection of West 39th Street and South Figueroa Street. Further, the Project Site is located less than 300 feet from the DASH Southeast Lines with a stop located at the intersection of West 39th Street and South Figueroa Street. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in ZI No. 2452.

Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and do not require evaluation under CEQA.

[5] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf., accessed December 17, 2024.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. A scenic vista is a view of a valued visual resource. Scenic vistas generally include views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest. Visual resources in the Project vicinity include views of the downtown Los Angeles skyline as well as historic buildings within the area such as the Los Angeles Memorial Coliseum. Pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), SB 743, and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's potential to damage scenic resources, including but not limited to, trees and rock outcroppings within a state scenic highway shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. In accordance with PRC Section

21099(d)(2)(B), potential damage to historic buildings within a state scenic highway must be considered. There are no state scenic highways within or near the Project Site.[6,7] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Therefore, Project impacts to scenic resources within a state scenic highway would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is currently developed with two-story, multi-family residential buildings and surface parking areas that generate low to moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting, vehicle headlights, interior lighting emanating from the multi-family residential buildings, and street lighting. The Project would introduce new sources of light and glare that are typically associated with residential, and retail and restaurant uses including: architectural lighting, interior lighting, security and wayfinding lighting, and vehicle headlights. As these are typical sources of light and glare for the existing highly urbanized area, and because the new sources of light and glare imposed by the Project would not have a substantial impact affecting day or nighttime views in the area, the Project's impacts would be less than significant. Additionally, pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

II. AGRICULTURE AND FORESTRY 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

[6] South Los Angeles and Southeast Los Angeles Community Plans, Draft EIR, 2016.

[7] California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed August 18, 2024.

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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located within a highly urbanized area. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[8] Therefore, the Project would not convert farmland to a non-agricultural use. No impact would occur, and no further evaluation of this topic in an EIR is required.

[8] California Department of Conservation, Important Farmland Finder https://maps.conservation.ca.gov/DLRP/CIFF/, accessed August 24, 2024.

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

No Impact. The Project Site is zoned C2-1L (Commercial, Height District 1L) along South Figueroa Street and RD1.5-1 (Residential Density Multiple Dwelling Zone, Height District 1) along South Flower Drive. Therefore, no agricultural zoning is present on the Project Site. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson contract.[9] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is within an urbanized area and does not include any forest or timberland. The Project is not zoned for and is not used as timberland or forest land. Therefore, the Project would not conflict with existing zoning for, or cause the rezoning of, forest land or timberland as defined by the Public Resources Code and Government Code. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is within an urbanized area and the Project Site and surrounding area does not include and forest land. Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest uses. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned for commercial and residential uses and is located in an urbanized area. No agricultural uses consisting of Prime Farmland, Unique Farmland or Farmland of Statewide Importance are located on the Project Site or in the surrounding area.[10] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impact would occur, and no further evaluation of this topic in an EIR is required.

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.

[9] California Department of Conservation. California Williamson Act Enrollment Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/, accessed August 24, 2024.

[10] California Department of Conservation, Important Farmland Finder https://maps.conservation.ca.gov/DLRP/CIFF/, accessed August 24, 2024.

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

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

Potentially Significant Impact. The Project is located within the South Coast Air Basin (Basin) which is located under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), which is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in some level of non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[11]). The SCAQMD prepared the 2016 and 2022 Air Quality Management Plans (AQMPs), which establish a program of rules and regulations directed at reducing air pollution emissions and achieving State and national air quality standards. These rules and regulations are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[12] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections in local general plans for jurisdictions in SCAG's planning area. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

The Project would involve construction activities which would generate temporary emissions from demolition, site preparation, grading, architectural coating, and vehicle exhaust associated with construction equipment and movement of construction equipment. Operational emissions generated by the Project's new residential and retail and restaurant uses would also be associated with area sources, energy sources, generator sources, and mobile sources. As a result, the proposed Project could generate

[11] Partial nonattainment designation for lead for the Los Angeles County portion of the Basin, only. The Basin has an extreme nonattainment designation for Ozone under the NAAQS. The Basin has a serious nonattainment designation for $PM_{2.5}$ under the NAAQS.

[12] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

air emissions that exceed SCAQMD thresholds. As a result, development of the Project could conflict with or obstruct implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

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

Potentially Significant Impact. Construction and operation of the Project could result in increased air pollution emissions of significant levels of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone (extreme), $PM_{2.5}$ (serious) and lead (partial), and state air quality standards for ozone, particulate matter less than ten microns in size (PM_{10}), and $PM_{2.5}$.[13] Construction-related pollutants would be associated with sources such as construction, worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

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

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

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

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

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[14] The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained and maintained in a manner that promotes odor control and would not result in substantially adverse odor impacts.

[13] SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, 2023.

[14] SCAQMD, CEQA Air Quality Handbook, 1993.

Construction and operation of the Project would also be required to comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[15] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property.[16]

Therefore, the Project would result in a less than significant impact to emissions leading to odors adversely affecting a substantial number of people. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

[15] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed December 17, 2024.

[16] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following discussion is based on the Tree Assessment Report, prepared by Arborgate Consulting, Inc. and dated July 24, 2024. The Tree Assessment Report was conducted to identify and evaluate the trees on-site that can be safely retained. The Tree Assessment Report is included as Appendix A.[17]

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

Less Than Significant. The Project Site is in an urbanized area and is developed with existing residential uses and surface parking. There are no undeveloped natural open space areas within or near the Project Site. There are currently no active rare, endangered, or threatened habitats listed by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFW) in the Project Site or surrounding area.[18, 19] Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state or federally listed species. Species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW[20] or by the USFWS[21] would be present on-site.

The Tree Assessment Report prepared for the Project included in Appendix A of this Initial Study indicated that the Project Site currently contains 23 non-protected trees including nine street trees. The trees include: (one *Lophostemon confertus* (brisbane box), one *Ulmus parvifolia* (Chinese elm), one *Cinnamomum camphora* (camphor tree), one *Pinus canariensis* (Canary Island pine), one *Syzygium paniculatum* (magenta cherry), three *Washington Rubusta* (Mexican fan palm), four *Yucca elephantipes*

[17] Tree Assessment Report For: 3822 Figueroa, Arborgate Consulting, Inc, July 24, 2024. Appendix A of this Initial Study.

[18] California Department of Fish and Wildlife, Natural Community Conservation Plans/Habitat Conservation Plans. Available online https://wildlife.ca.gov/conservation/planning/nccp/plans, accessed August 27, 2024.

[19] United States Fish and Wildlife Service, Information for Planning and Consultation, https://ipac.ecosphere.fws.gov/location/4JDJERJBGJE7XLJ2JSVD2FDUZA/resources, accessed February 24, 2025.

[20] California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, January 2023.

[21] United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed December 17, 2024.

(giant yucca), and 11 *Syagrus romanzoffianus* (queen palm). Although unlikely, these trees may provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code.

The Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." While the Project would require the removal of 14 on-site trees which could potentially provide nesting sites for migratory birds, compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with California Fish and Game Code Section 3503, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present beginning 30 days prior to the disturbance of suitable nesting habitat and during the removal activities to ensure that no active nests would be impacted. If active nests are found during removal activities, a buffer of 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until the fledglings have left the nest. The size of the required buffer area would vary with the species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW.

Therefore, with compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is fully developed and is located within a developed, urban portion of the City, and no watercourses, riparian habitats, including wetlands,[22, 23] or other sensitive natural communities, such as Significant Ecological Areas or Coastal Resource Areas,[24, 25] exist or are mapped on or near the Project Site. Since neither the Project Site nor its adjacent areas are within a biological resource area or Significant Ecological Area, implementation of the Project would not result in any adverse impacts to any riparian habitat or other sensitive natural communities.[26] No impact would occur, and no further evaluation of this topic in an EIR is required.

[22] South Los Angeles and Southeast Los Angeles Community Plans Draft EIR, 2016.
[23] U.S. Fish and Wildlife Service, National Wetlands Inventory.www.fws.gov/wetlands/Data/Mapper.html, accessed August 17, 2024.
[24] County of Los Angeles, Los Angeles County General Plan Update Final EIR, March 2015, Significant Ecological Areas and Coastal Resource Areas Policy Map, Figure 9.3.
[25] California Department of Fish and Wildlife. California Regional Conservation Plan, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed August 9, 2024.
[26] City of Los Angeles, Citywide General Plan Framework, Final EIR, January 1995, Section 2.18 Biological Resources

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

No Impact. The Project Site is fully developed, highly disturbed, and located in a heavily urbanized area. There are no protected wetlands, sensitive natural urban communities, or riparian habitats found on or near the Project Site.[27,28] Therefore, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is fully developed and located in a highly urbanized environment with minimal landscaping. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space within or immediately adjacent to the Project Site that provide linkages to natural open space areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory fish or wildlife species, or with established wildlife corridors, or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as a habitat for fish exist on the Project Site or in the vicinity of the Project Site. There are a total of 23 trees on the Project Site, including nine street trees. Although unlikely, the 14 existing on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds.

However, the Project would comply with the Migratory Bird Treaty Act (MBTA),[29] which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500-foot for raptors) would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgment of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In the event that any of the existing street trees need to be removed, the Project would include their replacement at a 2:1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500.

Overall, in compliance with the MBTA, California Fish and Game Code Section 3503, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division's requirements, the Project would not interfere

[27] U.S. Fish and Wildlife Service, National Wetlands Inventory.www.fws.gov/wetlands/Data/Mapper.html, accessed August 17, 2024.
[28] South Los Angeles and Southeast Los Angeles Community Plans Draft EIR, 2016.
[29] United States Fish and Wildlife Service, Migratory Bird Treaty Act of 1918.

substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations that protect biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree and Shrub Ordinance, as modified by Ordinance No. 186873, and as stated in the LAMC Chapter IV, Article 6. The Protected Tree Ordinance provides guidelines for the preservation of all Southern California native oak trees indigenous to California (excluding the Scrub Oak or Quercus dumosa) as well as the following tree species: California Black Walnut (Juglans californica var. californica); Western Sycamore (Platanus racemosa); California Bay (Umbellularia californica); Mexican Elderberry (Sambucus Mexicana); and Toyon shrubs (Heteromeles arbutifolia) of at least four inches in diameter at breast height or four and one-half feet above the ground level at the base of the tree or shrub.[30]

The Tree Assessment Report prepared for the Project included in Appendix A of this Initial Study did not find any protected trees listed in the City's Protected Tree Ordinance on the Project Site. The Project Site currently contains 23 trees, including nine street trees. The nine existing street trees are proposed be retained in the Project's landscaping plan. The remaining 14 on-site trees are planned for removal. Per LAMC Section 12.21 G, 53 trees are required (one tree per four units) by the Project. The Project would provide 54 new trees on the Project Site for a total of 63 trees. Though it is not planned, any future need for the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. 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. Additionally, none of the on-site trees or street trees are considered protected by the City of Los Angeles' Tree Preservation Ordinance No. 186,873. Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with seven two-story multi-family residential buildings along South Flower Drive and a two-story multi-family building and surface parking along South Figueroa Street. No Habitat Conservation Plans (HCPs), Natural Community Conservation Plans (NCCPs), or other approved habitat conservation plans as defined by the City of Los Angeles, apply to the Project Site.[31] Thus, the Project would not conflict with the provisions of an adopted

[30] These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…." The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

[31] South Los Angeles and Southeast Los Angeles Community Plans Draft EIR, 2016.

HCP, NCCP, or other habitat conservation plan. No impacts would occur and no further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

The following discussion is based on the Archaeological Resources Assessment, prepared by Kimley-Horn and Associates, Inc. and dated August 2024, which is included as Appendix B of this Initial Study.[32]

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

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

The Project would demolish seven residential buildings that have been identified as contributors to the Flower Drive Historic District (Flower Drive District), which was identified and evaluated as part of the s

[32] Archaeological Resources Assessment for the 3822 South Figueroa Project in the City of Los Angeles Los Angeles County, California, Kimley-Horn and Associates, Inc., August 2024. Appendix B of this Initial Study.

Historic Resources Survey Update for the Exposition Park/University Park Redevelopment Area in Los Angeles. It was determined eligible for listing in the California Register by the State Historical Resources Commission in 2008.[33] These buildings are therefore considered historic resources under CEQA. As such, further evaluation of the Project's potential impacts to historic resources will be provided in an EIR.

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

Potentially Significant Impact. As indicated in the Archaeological Resources Assessment prepared for the Project included as Appendix B of this Initial Study, no archaeological resources were identified within the Project Site as a result of the records search and associated research. As such, no archaeological resources that meet the definition of "Historical Resources" or "Unique Archaeological Resources," as defined by CEQA, have been identified within the Project Site. CEQA Guidelines Section 15064.5 (a)(3)(D) generally defines archaeological resources as any resource that "has yielded or may be likely to yield, information important in prehistory or history." Furthermore, the Archaeological Resources Assessment indicated that archaeological resources are unlikely to be present near the surface given the extent of previous development and presence of surficial artificial fill.

However, there is a moderate archaeological sensitivity and potential for deeply buried prehistoric or historic-period archaeological resources past the depths of added fill of four feet due to the alluvial fan topography, underlying Holocene-age geological deposits, and prehistoric and historic-era occupation in this region. The proposed depth of excavation for the Project is a maximum of ten feet below ground surface (bgs). As such, the Project may disturb native soils with moderate archaeological sensitivity during construction between four to ten feet bgs over the entire Project Site.

Additionally, the records search from the South Central Coastal Information Center (SCCIC) indicated that 26 cultural resource studies have been conducted and 44 cultural resources have been recorded within area 0.5-mile buffer surrounding the Project Site. However, no cultural studies have taken place and no cultural resources have been recorded on the Project Site. Of the 44 cultural resources located in the record search area, one resource, P-19-004191, is associated with an archaeological site. P-19-004191 is a historic-period refuse scatter that was recorded in the northwest portion of the record search area approximately 0.4 miles from the Project Site. Therefore, further evaluation for the Project's potential impacts related to disturbing previously undiscovered archaeological resources will be included in the EIR.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. The Project Site is developed with existing buildings and surface parking. Although the Project Site has been subject to grading and development in the past, the Project would result in maximum excavation depths of up to approximately ten feet below existing grade, which would be greater than those that have previously occurred on the Project Site, and construction may uncover existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave

[33] Historic Places LA, Los Angeles Historic Resources Inventory, https://historicplacesla.lacity.org/index.htm, accessed February 24, 2025.

goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission which shall identify the person or persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Nevertheless, due to the potential for human located on the Project Site, further evaluation for the Project's potential impacts related to disturbing previously undiscovered human remains will be included in the EIR.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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

Less Than Significant Impact. The Project is required to comply with California's Energy Efficiency Standards established in Title 24, Part 6, of the California Code of Regulations (CCR). These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards have since been continuously updated by the California Energy Commission on an approximately three-year cycle to allow for the incorporation of new energy efficiency technologies and methods.

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 the general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or 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 quality. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

The Project would comply with the applicable Energy Efficiency Standards provisions (Part 6) of Title 24 and the CALGreen Code (Part 11). The Project would comply with the current standards at the time of building permit issuance by the City. Those standards would be no less stringent than the 2022 Building Energy Efficiency Standards, which apply to all building permit applications on or after January 1, 2023.[34]

Construction

Energy use associated with construction of the Project would include conveyance of water used for dust control, diesel fuel consumption by on-road trucks (hauling, material delivery, and vendor trips) and off-road construction equipment and gasoline consumption by on-road worker vehicles (construction worker commute trips). Construction of the Project would require the export of building debris from the Project Site during the demolition phase as well as the delivery of building materials during the building phase.

Electricity would be required to power the on-site construction trailer(s), perimeter lighting, etc., but is expected to be minimal compared to available supplies. Due to the portable, temporary nature of the trailers and lighting, they are not subject to the same codes and standards as permanent buildings and infrastructure. Nonetheless, lights and trailers would be used only as needed and be sized appropriately. Construction would not involve the on-site combustion of natural gas. Because electricity use would be limited to the temporary powering of service functions and natural gas would not be used, no additional analyses are required to determine that the consumption of electricity and natural gas during construction would not be wasteful, inefficient, or unnecessary.

The estimated total gasoline and diesel fuel anticipated to be used during construction is summarized below in **Table 3: Summary of Estimated Energy Use During Project Construction**, and in Appendix C, Energy Calculations, of this Initial Study.[35]

Table 3: Summary of Estimated Energy Use During Project Construction

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Consumption[1]	Percentage of Countywide Consumption
Automotive Fuel Consumption[2,3,4]			
On-Site Diesel			
Demolition	7,115 gallons		
Site Preparation	3,959 gallons		
Grading	10,889 gallons		
Infrastructure	5,299 gallons		
Building Construction	41,925 gallons		
Architectural Coating	518 gallons		
Off-Site Diesel			
Demolition	1,846 gallons		
Site Preparation	0 gallons		
Grading	4,211 gallons		
Infrastructure	2,544 gallons		
Building Construction	19,424 gallons		
Architectural Coating	0 gallons		

[34] California Energy Commission, 2022 Building Energy Efficiency Standards. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency, accessed September 2024

[35] See Energy Consumption Worksheets included as Appendix C of this Initial Study.

Total Diesel	**97,729 gallons**	**535,939,687 gallons**	**0.0182%**
Off-Site Gasoline			
Demolition	535 gallons		
Site Preparation	216 gallons		
Grading	736 gallons		
Infrastructure	7,193 gallons		
Building Construction	55,424 gallons		
Architectural Coating	3,662 gallons		
Total Gasoline	**67,766 gallons**	**3,369,809,065 gallons**	**0.0020%**
Electricity			
Water Conveyance	**1,034 kWh**	**68,484,956,280 kWh[5]**	**0.000002%**

Notes:

1. *The Project's estimated increase in automotive fuel consumption are compared with the countywide fuel consumption (projected) in 2027.*
2. *Countywide fuel consumption data is obtained from the California Air Resources Board EMFAC 2021 model.*
3. *Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2022.1).*
4. *The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.*
5. *The Project increase in electricity consumption is compared to the total consumption in Los Angeles County in 2022.*

Refer to **Appendix C** for assumptions used in this analysis.

During the construction phase, the Project would comply with regulatory compliance measures intended to conserve energy. These measures would include restricting haul truck trips to off-peak hours, not allowing engines to idle in excess of five minutes when not in use (CARB Air Toxics Control Measure) and using fuel that meets specified fuel and fuel additive requirements and emission standards (CCR Title 13, Section 2485). These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

As indicated in **Table 3**, the overall diesel fuel consumption during construction of the Project would be 97,729 gallons and gasoline consumption would be 67,766 gallons, which would constitute nominal amounts (0.0182 percent and 0.0020 percent, respectively) of fuel use in the County. Project construction would also require approximately 1,034 kWh of electricity for water conveyance, which constitutes a negligible percentage of electricity use in the County. Project construction is expected to start in 2027 and be completed by 2029. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction fuel use is intermittent and temporary, can vary depending on construction phase, and would cease upon completion of the particular construction activities requiring the use of fuels. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State.

Additionally, the energy analysis does not include a full life cycle analysis of energy usage that would occur over the production of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in

impact assessment, and may lead to a false or misleading level of precision in reporting. The production methods and source of construction materials are not known. Also, it is not known how Project building materials (e.g., steel, concrete, lumber) would be recycled or disposed of at end of life. As energy usage would vary widely depending on the production methods, source location, recycling or disposal methods used for building materials, it would be speculative to assess energy usage for production and disposal of Project building materials. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature, and impacts would be less than significant.

Operations

Electricity

During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, hearing, ventilating, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. Electricity transmission for the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), which serves approximately four million people in the City and is the nation's largest municipal electric utility.[36] In order to properly assesses and meet growing energy demands, the LADWP releases Integrated Resource Plans. The latest, the 2022 Final Power Strategic Long-Term Resource Plan, is a comprehensive roadmap intended to assist LADWP to meet the growing energy demand from consumers in an environmentally responsible and cost effective manner and has a 25-year horizon that aligns with state goals for greenhouse gas (GHG) emissions reductions.[37] LADWP reports that it has a net dependable generation capacity of 8,101 megawatts (MW).[38] In Fiscal Year 2020-2021, LADWP supplied 20,936 gigawatt-hours (GWh) to more than 1.55 million residential and business customers, and LADWP forecasts that its total energy sales in the 2028–2029 fiscal year (the Project's buildout year) would be 21,826 GWh of electricity.[39,40]

As shown below in **Table 4: Summary of Estimated Energy Consumption During Project Operation**, the estimated annual Project-related increase in the consumption of electricity would be approximately 942,368 kilowatt-hours (kWh) per year. When compared to Los Angeles County electricity consumption of 68,484,956,280 kWh in 2022, the Project's estimated electricity demand would represent approximately 0.0014 percent of total demand.[41] Compared to the LADWP's 2020-2021 sales of 20,936 GWh, the Project's estimated electricity demand would represent approximately 0.005 percent of total demand within the LADWP service area. This amount is negligible and is within the anticipated service capabilities of LADWP. Further, as discussed above, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would

[36] Los Angeles Department of Water & Power (LADWP) (2022), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/who-we-are/power-system/strategic-long-term-resource-plan, accessed September 2024.
[37] Ibid.
[38] Ibid.
[39] Ibid.
[40] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.
[41] California Energy Commission, Electricity Consumption by County, https://ecdms.energy.ca.gov/elecbycounty.aspx, accessed February 24, 2025.

also be required to comply with the L.A. Green Building Code and City Ordinance No. 187,714, which incorporates by reference the CALGreen Code and California's Building Energy Efficiency Standards. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code.

The L.A. Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 34 residential parking spots. Of the 34 residential parking spots, 11 spaces would be Electric Vehicle (EV) capable, nine spaces would be EV ready, and four spaces would include an EV charger. Of the six commercial parking spaces, two spaces would be EV capable and two spaces would include an Electric Vehicle Charging Station (EVCS).

Therefore, with regulatory compliance and incorporation of energy conservation features that would reduce the Project's electricity demand from that estimated herein, Project operation would not result in the wasteful, inefficient, or unnecessary consumption of electricity and no mitigation measures are required.

Table 4: Summary of Estimated Energy Consumption During Project Operation

Energy Type	Annual Quantity[1]	Los Angeles County Annual Energy Consumption[2]	Percentage of Countywide Consumption
Operational Electricity			
Electricity (On-Site)[2]	882,792	-	-
Electricity (Water Conveyance)[3]	59,576	-	-
Electricity (Total)[4]	942,368 kWh	68,484,956,280 kWh	0.0014%
Automotive Fuel Consumption			
Gasoline (mobile sources)	104,745 gallons	3,171,276,372 gallons	0.00330%
Diesel (mobile sources)	702 gallons	528,535,000 gallons	0.00013%

kWh = kilowatt-hours

Notes:

1. *Electricity value provided represent most conservative energy consumption estimates. The residential component of the Project would not include natural gas usage.*
2. *Countywide fuel consumption is from the California Air Resources Board EMFAC 2021 model (2030 operational year).*
3. *Water Conveyance electricity use is dominated by water usage and includes the energy associated with the supply, treatment, distribution of water and wastewater.*
4. *The Project increase in electricity consumption is compared to the total consumption in Los Angeles County in 2022.*

Source: Appendix C, for assumptions used in this analysis.

Transportation-Related Fuels

Operation of the Project would generate vehicle trips associated with people driving to and from the Project Site. Based on the trip generation estimates and trip lengths found in California Emissions Estimator Model (CalEEMod) outputs as identified in Appendix C in this Initial Study, it is estimated that operation of the Project would result in 2,766,961 vehicle miles traveled (VMT) on an annual basis. It is

estimated that Project trips would result in the annual consumption of approximately 104,745 gallons of gasoline fuel and 702 gallons of diesel for Project operations.[42] As shown in **Table 4**, above, transportation fuel usage during Project operations would represent 0.00330 percent of gasoline usage and 0.00013 percent of diesel usage within Los Angeles County.

The Project would include conservation measures that would decrease its VMT and therefore, decrease its consumption of petroleum-based fuels (gasoline and diesel). Specifically, consistent with the 2024–2050 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would encourage alternative modes of transit by providing bicycle parking spaces and convenient access to public transit, including light rail. The Project would provide a total of 40 vehicle parking spaces including 34 residential and six commercial spaces. Of the 34 parking spots reserved for residents, 11 spaces would be EV capable, nine spaces would be EV ready, and four spaces would include an EV charger. Of the six parking spaces reserved for visitors, two spaces would be EV capable, and two spaces would include an EVCS. The Project would also provide 130 long-term bicycle spaces and 16 short-term bicycle spaces for a total of 146 bicycle spaces.

The Project would improve mobility and accessibility, encourage transit use and walking/bicycle trips, and reduce VMT and GHG emissions by intensifying urban density in proximity to transit and destinations. As such, Project operation would not result in wasteful, inefficient or unnecessary consumption of petroleum-based fuels, but would promote walking, biking, and other modes of transportation.

Based on the above impact analysis, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation. Therefore, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Based on the analysis provided below, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the Project's electricity demands would be served by LADWP. Additionally, as stated above, the Project would comply with the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2024–2050 RTP/SCS, which contain conservation policies that are mandatory under the City's Building Code. As such, the Project would not conflict with applicable plans for renewable energy or energy efficiency. The requirements described in the Title 24 energy standards, CALGreen and the Los Angeles Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would incorporate these measures as required by code. The most recent Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

As discussed above, Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy

[42] See Appendix C of this Initial Study for detailed calculations.

used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. The Project would comply with Title 24, Part 6 by having: (a) sensor-based lighting controls — for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and (b) efficient process equipment.

Part 11 of Title 24 contains voluntary and mandatory energy efficiency measures that are applicable to the Project under the California Green Building Standards Code. As discussed above, the Project would result in an increased demand for electricity and petroleum-based fuels. In accordance with the Project's Title 24, Part 11 mandatory compliance, the Project would (a) divert 50 percent of its construction and demolition waste from landfills; (b) schedule mandatory inspections of its energy systems to ensure optimal working efficiency; (c) use only low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle boards; and (d) include features ensuring a 20 percent reduction in indoor water use. In addition, the residential component of the Project would not consume natural gas. Compliance with all of these mandatory measures would decrease the Project's consumption of electricity and petroleum-based fuels.

The Project would not conflict with any of the federal, state, or local plans for renewable energy and energy efficiency. Because the Project would comply with Parts 6 and 11 of Title 24, no conflict with existing energy standards and regulations would occur.

With regard to transportation uses, the Project would improve mobility and accessibility, encourage transit use and walking/bicycle trips, and reduce VMT and GHG emissions by intensifying urban density in proximity to transit and destinations. According to the Transportation Assessment prepared for the Project,[43] the Project's proposed residential use would result in an estimated VMT per capita of 4.9, which would be below the City's threshold for the South Los Angeles Area Planning Commission area of 6.0. The Project would be consistent with the SCAG RTP/SCS as it is an infill development located within close proximity of a variety of transportation options, which include walking, biking, and the use of public transportation. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, petroleum-based fuels during construction and operations would also represent a small fraction of the 2030 projected fuel use in Los Angeles County.

Based on the above impact analysis, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

[43] Kimley-Horn, 3822 Figueroa Street Student Housing Project Transportation Assessment, October 2024.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis is based, in part, on the Revised Limited Geotechnical Exploration - 3801 to 3855 Flower Drive and 3822 to 3830 South Figueroa Street, City Of Los Angeles, California (Geotechnical Report) prepared for the Project by Leighton and Associates, Inc., dated March 8, 2023, revised June 4, 2024; and the Paleontological Resources Assessment prepared for the Project by Kimley-Horn and Associates, Inc., dated August 2024. The Geotechnical Report and Paleontological Assessment are included as Appendix D and Appendix E of this Initial Study, respectively.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or that have shown evidence of movement within the past 11,700 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones).[44] These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As described in the Geotechnical Report, there are no known active faults that have been mapped within the Project Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest fault to the Project Site is the Puente Hills Blind Thrust located in the subsurface of the Los Angeles Basin 0.7 miles north of the Project Site. The closest major active faults near the Project Site with surface expression include the Newport-Inglewood fault zone and Hollywood faults, which are located 4.5 miles and 6.8 miles to the southwest and north of the Project Site, respectively. As noted in the Geotechnical Report, considering the locations of these mapped faults relative to the Project Site, the potential impact of surface fault rupture occurrence at the Project Site is considered to be low. The Project would not contain uses or activities, such as mining operations or deep excavation into the earth, that would exacerbate the activity of a known earthquake fault. As such, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, related to

[44] The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publication 42, Earthquake Fault Zones.

rupture of a known earthquake fault. Therefore, impacts are less than significant, and no further evaluation of this topic in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the Project would directly or indirectly cause the risk of personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is seismically active and susceptible to strong ground shaking from severe earthquakes. Strong ground motion occurs as energy is released during an earthquake. The intensity of ground motion is dependent upon the distance to the fault rupture, the earthquake magnitude, and the geologic conditions underlying and surrounding the Project Site. The Los Angeles Basin, as well as most of Southern California, is located within a complex zone of faults and folds resulting from compressional forces occurring along a bend within the boundary between the Pacific and North American tectonic plates.

The Project Site may experience strong ground shaking resulting from an earthquake occurring along one or more of the major active or potentially active faults identified above or other unmapped faults.

Potential impacts related to seismic ground shaking would be reduced to less than significant through regulatory compliance, and Project structural design. State and City building code requirements ensure that buildings are designed and constructed in a manner that, although they may sustain damage during a major earthquake, their risk of collapse is substantially reduced. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the California Building Code, the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates the current seismic design provisions of the 2022 California Building Code, with City amendments, to minimize seismic impacts. The 2022 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific Geotechnical Report prepared by a California licensed engineer that would be subject to review and approval by the expert engineering staff at LADBS. As discussed in the Geotechnical Report, while the Project Site is subject to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. The Geotechnical Report provides site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site.

As such, based on compliance with regulatory requirements and practices, the Project would not directly or indirectly cause potential substantial adverse effects including the risk of loss, injury, or death, related

to seismic ground shaking. Therefore, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of soil strength or stiffness due to a buildup of excess pore-water pressure during strong ground shaking. Liquefaction is associated primarily with low density, granular, saturated soil. Effects of severe liquefaction can include sand boils, excessive settlement, bearing capacity failures, and lateral spreading.

As noted in the Geotechnical Report, the Project Site is not mapped within an area prone to liquefaction as shown on the State of California Seismic Hazard Zones Map for the Hollywood Quadrangle and as identified by the City of Los Angeles General Plan's Safety Element.[45],[46],[47] As part of the Geotechnical Report, borings advanced to a maximum depth of approximately 50 feet bgs did not encounter groundwater, nor did explorations at a neighboring site approximately 100 feet to the south, drilled to a depth of 101.5 feet bgs. Based on these considerations and soil correlations, as determined in the Geotechnical Report, the potential for liquefaction occurring at the site is considered low.

Additionally, pursuant to LAMC Section 91.7006.2, the Geotechnical Report for the Project addressing the soils conditions underlying the Project Site and the final design of the development would be reviewed and approved by LADBS as part of the City's ministerial process for issuing grading and building permits. Review and approval of the Geotechnical Report and design considerations by LADBS would ensure that development of the Project Site would occur in compliance with building safety requirements, including the California Building Code and the LAMC. As such, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

iv. Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. As noted in the Geotechnical Report, the Project Site is not located within a zone of potential seismically induced landslides. The Project Site is also not located within any mapped landslide area by the City of Los Angeles General Plan's Safety Element.[48] Due to the relatively level ground on and surrounding the Project Site, the potential for seismically induced landslides on the Project Site is low. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to landslides. No impact would occur, and no further evaluation of this topic in the EIR is required.

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

Less than Significant Impact. Project construction would involve ground-disturbing activities (e.g., excavation, grading, and foundation construction) that have the potential to disturb existing soils

[45] California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, 2014.

[46] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007),http://zimas.lacity.org/, accessed December 18, 2024.

[47] City of Los Angeles, General Plan Safety Element Figure 12.1, 2021, https://planning.lacounty.gov/wp-content/uploads/2022/11/12.2_Chapter12_Figures.pdf, accessed January 24, 2025.

[48] Ibid.

within the Project Site and expose these soils for a limited time and allow for possible erosion. It is estimated that approximately 8,310 cubic yards of export would be hauled from the Project Site. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to erosion and runoff. However, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs to be used during construction to manage and control stormwater and non-stormwater discharges, including, but not limited to, erosion control and sediment control with sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize erosion and the discharge of pollutants in stormwater runoff during construction. Additionally, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during Project Site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and Project Site preparation would be required to comply with all applicable provisions of Chapter IX, Article 1, Division 70 of the LAMC, which address grading, excavations, and fills. This LAMC division requires that all grading activities occur in accordance with grading permits issued by LADBS. The grading permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1 to April 14), a Wet Weather Erosion Control Plan must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The Wet Weather Erosion Control Plan would include measures such as diversion dikes to channel runoff around the Project Site. Division 70 also requires that stockpiled, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adherence to applicable regulations.

Following the completion of construction, the potential for erosion would be relatively low since the Project Site would be largely impervious and the Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833)[49] and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. With compliance with applicable regulations, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant. Therefore, the Project would not directly or indirectly cause potential significant impacts related to substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and no further evaluation in the EIR is required.

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

Less than Significant Impact. As discussed above, the Project Site is not located within a zone of potential seismically induced landslides. The Project Site is also not located within any mapped landslide

[49] Los Angeles Sanitation and Environment (LASAN), Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

area by the City of Los Angeles General Plan's Safety Element.[50] In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impact related to landslides would occur.

As noted in the Geotechnical Report, liquefaction may also cause lateral spreading. For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area such as an unlined river channel. As discussed previously because the potential for liquefaction at the Project Site is considered to be low and the Project Site is laterally confined, the potential for lateral spreading at the site is also considered low.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. Because no reports on regional subsidence have documented subsidence in the Project Site vicinity, and the Project would not involve the removal of water or oil at the Project Site, the potential for ground subsidence is considered very low.

Seismically induced settlement generally consists predominantly of liquefaction-induced settlement (below groundwater) and to a lesser extent dynamic compaction of unsaturated, granular soil (above groundwater). These settlements occur primarily within low-density sandy soil due to reduction in volume during and shortly after an earthquake event. As determined in the Geotechnical Report, based on the depth to groundwater at the Project Site, the potential for liquefaction is considered to be low; therefore, the potential for seismically induced settlement due to liquefaction is also considered low.

As previously discussed, compliance with the state and City building code requirements include the incorporation of the Project Site- and Project-specific design requirements for soil stability established in the Geotechnical Report that would be reviewed and approved by LADBS. The Project would be required to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report with all of the design comments and conditions imposed by LADBS based on their detailed review of Project plans and structural calculations, which would account for slope stability at the Project Site.

Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. As such, the Project would not directly or indirectly cause or exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant, and no further evaluation in the EIR is required.

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

Less Than Significant Impact. Expansive soils contain significant amounts of clay particles that swell considerably when wet and shrink with the loss of water. Foundations and structures constructed on these soils can be subject to uplifting forces caused by the swelling, potentially resulting in heaving and cracking of both building foundations and slabs-on-grade. However, implementation of standard engineering and earthwork construction practices, such as proper foundation design and proper moisture conditioning of earthen fills would reduce the impacts associated with expansive soils.

As determined in the Geotechnical Report, expansion index testing of the near-surface soil at the Project Site characterized soils as silty sand with an Expansion Index of EI=2, which is considered very low

[50] Ibid.

expansion potential. Therefore, impacts would be less than significant, and no further evaluation in the EIR is required.

e. Would the project 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 Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing sewer and wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur, and no further evaluation in the EIR is required.

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

Less Than Significant Impact. As indicated in the Paleontological Resources Assessment, included as Appendix E of this Initial Study, no known paleontological resources were identified within the Project Site. There is a low paleontological sensitivity for soils zero to 25 feet bgs in the fill layer (zero to four feet bgs) and Holocene layer (four to 25 feet bgs). The Project Site has been developed in the past, and it is unlikely that any fossil-bearing soils would be encountered at these layers.

The Paleontological Resources Assessment concludes that there is a moderate-to-high sensitivity for paleontological resources within soils at depths of 25 feet or deeper bgs in the Pleistocene layer. The moderate-to-high paleontological sensitivity of soils at 25 feet or deeper in the Pleistocene layer is evident by the age and composition of soils and sediments in the Project Site and the knowledge of paleontological resources identified within similar sediment deposits nearby. The presence of any intact paleontological resources within deeper sediments would be considered scientifically significant if discovered.

Excavation for the Project would reach a maximum depth of ten feet bgs. Therefore, excavation for the Project would not reach the sediment deposit most likely to contain paleontological resources, which is the Pleistocene layer (25 feet bgs and deeper). Should proposed excavation depth substantially increase to reach the Pleistocene layer, paleontological resources could be encountered, and the conclusions of this analysis may need to be revisited. In summary, it is unlikely that paleontological resources could be inadvertently impacted during Project implementation with the current proposed excavation depth of ten feet and, for this reason, development of the Project would be unlikely to directly or indirectly destroy a unique paleontological resource or site.

The City has established a standard condition of approval to address inadvertent discovery of paleontological resources that would apply to the Project. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, with compliance with the City's standard condition of approval, impacts to paleontological resource or site or unique geologic feature would be less than significant, and no further evaluation in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

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

Potentially Significant Impact. The Project would include direct and indirect greenhouse gas (GHG) emissions from construction and operations. Project construction could result in direct emissions of carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) from construction equipment, the transport of materials, and construction workers traveling to and from the Project Site. Project operational emissions would result from activities such as vehicular traffic and operation of landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation associated with solid waste, and fugitive refrigerants from heating, ventilation, and air conditioning (HVAC) equipment. Additional analysis is required to determine whether activities associated with the Project could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, further evaluation of the Project's GHG emissions will be provided in the EIR.

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

Potentially Significant Impact. The Project would result in direct and indirect GHG emissions with the potential to conflict with adopted GHG-related plans, policies, or regulations applicable to the Project Site. The EIR will evaluate the potential for the Project to conflict with State and local plans, policies, and regulations adopted for the purpose of reducing GHGs.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following discussion is based on the Phase I Environmental Site Assessment (Phase I ESA), prepared by Kimley-Horn and Associates, Inc., dated August 29, 2024, included as Appendix F of this Initial Study.[51]

[51] Phase I Environmental Site Assessment, Kimley-Horn and Associates, Inc., August 29, 2024. Appendix F of this Initial Study.

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

Less Than Significant Impact.

Construction

Typical of many projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act,[52] California Hazardous Waste Control Law,[53] Federal and State Occupational Safety and Health Acts,[54,55] SCAQMD rules,[56] and permits and associated conditions issued by LADBS. These existing regulations address the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no further evaluation in the EIR is required.

Operation

Operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials typical of those used in residential, retail and restaurant uses, including form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products by building operational staff and hired contract professionals. However, all such potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under

[52] United States Environmental Protection Agency, Resource Conservation and Recovery Act (RCRA) Laws and Regulations, www.epa.gov/rcra, accessed December 19, 2024.

[53] California Health and Safety Code, Division 20, Chapter 6.5 Hazardous Waste Control [25100-25259].

[54] United States Department of Labor, Occupational Safety and Health Administration, OSH Act of 1970, www.osha.gov/laws-regs/oshact/completeoshact, accessed December 19, 2024.

[55] State of California Department of Industrial Relations, California Division of Occupational Safety and Health, Cal/OSHA, www.dir.ca.gov/dosh/, accessed December 19, 2024.

[56] South Coast Air Quality Management District, South Coast AQMD Rule Book.

conditions that pose a material threat of a future release to the environment.[57] The Phase I ESA identified a former gas station 0.4 miles from the Project Site, and no records of hazardous materials spills or violations associated with the Project Site or the former gas station address. Accordingly, the Phase I ESA did not discover evidence of a REC on the Project Site.

The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (vehicle fuels, paints, oils, and transmission fluids) occur or if asbestos-containing materials (ACMs) or lead-based paint (LBP) that may be encountered in the existing buildings are not properly handled and disposed of. The Project could also release hazardous materials into the environment during operation if spills or emissions of hazardous materials required for normal operation of retail and restaurant and residential land uses such as cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, bleach, grease, and petroleum products, occur.

Construction

Spills

During construction, regulatory requirements and standard construction BMPs for the use and handling of hazardous materials required for construction would be implemented to avoid and reduce the potential for spills and releases pursuant to local, state, and federal regulations such as the Hazardous Materials Transportation Act,[58] Resource Conservation and Recovery Act,[59] the California Hazardous Waste Control Act,[60] and California Code of Regulations, Title 22.[61] Adherence to these regulations and regulations mandating immediate response and reporting of spills to state and/or county officials under the state's Spill Release Reporting regulations would ensure that significant hazards related to the release of hazardous materials such as spills into the environment during construction would not occur and, where they occur, would be appropriately addressed through regulatory compliance requirements.

ACMs/LBPs

Additionally, historical records indicate that the existing residential buildings on the Project Site were constructed in the 1920s. While not considered RECs, asbestos containing materials (ACM) and lead-based paint (LBP) may be present in the existing buildings. The Project would be required to comply with existing regulations that comprehensively address governmental reporting requirements and the removal, transport, and disposal of ACMs and LBP that may be within the existing structure. In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in: California Code of Regulations, Title 8, Section 341.6l; Code of Federal Regulations, Title 29, Section 1926.1101(b); Code of Federal Regulations, Title 40, Part 61, Subpart M; and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the Code of

[57] Phase I Environmental Site Assessment, Kimley-Horn and Associates, Inc., August 29, 2024. Appendix F of this Initial Study.

[58] Hazardous Materials Transportation Act of 1970 (49 U.S.C. §§ 5101–5127).

[59] Resource Conservation and Recovery Act of 1976 (42 U.S.C. ch. 82 § 6901 et seq).

[60] California Hazardous Waste Control Act (California Health and Safety Code, Section 25100 et seq.).

[61] California Code of Regulations (CCR) at Title 22 Social Security, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste.

Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1.

In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. Adherence to these regulations and procedures would ensure that all ACMs and LBP currently present on the Project Site would be remediated and disposed of in accordance with federal, state, and local regulations during Project demolition activities. Therefore, the Project would not create a significant hazard to the public or environment through upset and accident conditions involving the release of ACMs or LBP into the environment.

Contaminated Soils/Groundwater

The Phase I ESA did not identify any RECs indicative of the potential for groundwater contamination or contaminated soils at the Project Site. Groundwater was not encountered during explorations that reached a maximum depth of 51.5 feet bgs.

Undocumented Underground Features

A previous Phase I ESA that was prepared for the Project Site noted that undocumented underground features, such as underground storage tanks (USTs) used for heating oil and basements, are common in the general area surrounding the Project Site.[62] Despite the findings of the previous Phase I ESA, there is strong evidence to suggest that no such USTs, basements, buried debris, waste drums, or tanks would be located beneath the Project Site. The existing residential structures on the Project Site were originally constructed in the 1920s, and no other uses preceding the residential development were identified. As such, the Phase I ESA determined that there is a very low potential for undocumented contamination sources to be encountered underground. Therefore, the Phase I ESA concluded that undocumented underground features are not a REC. Therefore, significant hazards related to the release of hazardous materials into the environment during construction related to undocumented underground features would not occur no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those typical of a multi-family residential and ground floor retail and restaurant mixed-use development. Hazardous materials typical of such developments are not considered environmental concerns, and their use by the Project would not differ dramatically in type and quantity from the existing multi-family residential uses on the Project Site. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Further, the Project Site is not located within a Methane Zone or Methane Buffer Zone.[63]

As such, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into

[62] Phase I Environmental Site Assessment, Kimley-Horn and Associates, Inc., August 29, 2024. Appendix F of this Initial Study.

[63] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), http://zimas.lacity.org, accessed January 24, 2025

the environment resulting from Project operations. Therefore, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is located 0.13 miles southeast of the Dr. Theodore T. Alexander, Jr. Science Center School. The next closest schools to the Project Site include the University of Southern California located approximately 0.3 miles to the north of the Project Site, and Clinton Middle School and Animo Jackie Robinson Charter High School located approximately 0.4 miles northeast of the Project Site. As previously discussed, construction of the Project would require the demolition and removal of the existing buildings, which may contain ACMs and LBP. However, as detailed in Response Checklist Question VIII.b above, all ACMs and LBP would be removed during construction in accordance with applicable regulatory requirements which would reduce potential impacts to a less than significant level.

Project construction would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Project operation would also involve the limited use of hazardous materials typically used in the maintenance of retail and restaurant and residential uses including cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials would be used, stored, and disposed of according to manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Therefore, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis, known as the Cortese List. The Phase I ESA included a search of such environmental records published by local, state, tribal, and federal agencies pursuant to Government Code Section 65962.5. Although the Project Site is not listed on the Cortese List, the Phase I ESA identified parcels within the Project Site that are listed in two environmental databases, as summarized below:

- *Barry Reeves, 3819 South Flower Drive*. This address was listed on the CA HAZNET Hazardous Waste Tracking and System Manifests and the CA Hazardous Waste Generators databases. The Envirosite Government Records Report indicates this address, which is the location of a 19-unit multi-family residential building on the Project Site, was listed as a temporary hazardous waste generator site due to temporary transport of 2.5 tons of asbestos containing waste in the year 2000. The site status is listed as “inactive.” This listing is consistent with regulatory reporting requirements and no violations were identified. Per the Phase I ESA, this listed is not considered a REC.

- *EVR Gard Construction, 468 West 38th Street*. This address was listed on the CA HAZNET Hazardous Waste Tracking and System Manifests and the CA Hazardous Waste Generators databases. This listing is associated with temporary generation and transport of approximately 2.5 tons of hazardous waste, though this listing may be in error as this address is the location of a four-unit, multi-family residential building constructed in the 1920s. No manifests documenting the specifics of the waste type were available. However, the site status has been "inactive" since the year 2013. Per the Phase I ESA, this listing demonstrates compliance with regulatory reporting requirements and no violations were identified and the site is therefore not considered a REC.

Accordingly, the Project would not create a significant hazard to the public or the environment as a result of its listing on the above databases compiled pursuant to Government Code Section 65962.5. Therefore, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located within two miles of an airport or within an airport planning area. The closest airport to the Project Site, the Los Angeles International Airport, is located approximately nine miles southwest of the Project Site. No impacts would occur and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City's emergency response is coordinated through the Emergency Operations Organization (EOO). The EOO is the operational department of the City of Los Angeles responsible for the City's emergency preparations (planning, training and mitigation), and response and recovery operations. The EOO Master Plan and individual agency Emergency Response Plans set forth procedures for City personnel to follow in the event of an emergency situation stemming from natural disasters, technological incidents and nuclear defense operations. As specified in the City Emergency Operations Plan Evacuation Annex, "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." [64] However, in response to a more localized emergency, such as a hillside wildfire, the Los Angeles Fire Department (LAFD) works in coordination with the Los Angeles Department of Transportation (LADOT) and Los Angeles Police Department (LAPD) to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.[65] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary partial lane closures. However, both directions of travel on area roadways would be maintained in accordance with standard construction management plans. This would ensure adequate disaster route circulation and emergency access. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety

[64] City of Los Angeles Emergency Operations Plan, Evacuation Functional Support Annex, October 2020.
[65] Los Angeles Safety Element, November 2021, p. 23.

Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation requirements.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. In addition, the Project does not include improvements that would require the installation of any barriers that would impede emergency response within and in the vicinity of the Project Site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[66,67] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed residential and retail and restaurant uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death involving wildland fires. No impacts would occur and no further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

[66] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), http://zimas.lacity.org/, accessed January 24 ,2025.

[67] City of Los Angeles. City of Los Angeles General Plan Safety Element p. 27. https://planning.lacity.gov/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf, accessed July 25, 2024.

[67] CALFIRE. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, accessed July 25, 2024.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following discussion is based on the Civil Engineering Report, prepared by David Evans and Associates, dated September 2024, included as Appendix G in this Initial Study.[68]

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

Less Than Significant Impact.

Surface Water Quality

Construction

[68] Civil Engineering Report, David Evans and Associates, September 2024. Appendix G of this Initial Study.

Grading and construction activities will temporarily expose the underlying soils and may make the Project Site temporarily more permeable. Also, exposed and temporarily stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Site to prevent runoff from impacting off-site drainage facilities or receiving waters. Construction activities are temporary and flow directions and runoff volumes during construction would be controlled.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not result in discharges that would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. With regulatory compliance, such activities would not conflict with implementation of a water quality control plan. Therefore, construction-related impacts to surface water quality would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

The Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance (Ordinance 183,833) which requires that post-construction stormwater runoff from new projects be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile, 24-hour storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID.

As noted in the Civil Engineering Report included as Appendix G of this Initial Study, implementation of the Project would result in over 10,000 square feet of new impervious surface requiring the treatment of stormwater before entering the stormwater system. Per the latest version of the City of Los Angeles LID requirements, the Project is required to infiltrate as a BMP unless Project Site conditions are unsuitable or infeasible, in which case other of the allowable methods of compliance would be required. The Geotechnical Report included as Appendix D of this Initial Study concluded that infiltration at the Project Site is feasible.

The Project would be designed to maintain or reduce stormwater runoff by implementing measures to minimize flows leaving the Project Site. The Project Site would implement a drywell system.[69] As noted in the Civil Engineering Report, preliminary LID calculations indicate a required mitigation volume of 5,121 cubic feet. At the time the study was done, there was no site-specific percolation rate data available.

[69] A system of drywells would facilitate the infiltration of stormwater at the site, with overflow directed to the adjacent storm drain system. A state-of-the-art drywell would be designed to infiltrate stormwater into native soils to recharge groundwater reserves and mimic the natural/pre-development water cycle. Each system includes one or two pre-treatment chambers that remove pollutants through settling, screening, and hydrocarbon absorption.

When percolation testing is performed and infiltration rates are determined, drywell sizing calculations would be provided to address the required treatment volume. The Project's overflow would discharge to the storm drain system via under sidewalk drains, which would be sized using the 50-year storm.

The Civil Engineering Report performed hydrologic calculations for the Project using the methods outlined in the LA County Hydrology Manual to calculate the 50-year, 24-hour storm event and 85th Percentile storm event for water quality purposes. The Project would implement measures to minimize flows leaving the Project Site and the post-developed condition would be equal to or less than the pre-developed condition. The 50-year, 24-hour Storm Event rainfall was determined to be 5.4 inches, with the 85th Percentile storm event was 1.09 inches.

Due to incorporation of the required LID BMPs, operation of the Project would not result in discharges that would violate any water quality standards or waste discharge requirements (WDRs) or otherwise substantially degrade surface or ground water quality, including not causing: (1) pollution that would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree that would unreasonably affect beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree that would create a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance conditions that would be injurious to health, affect an entire community or neighborhood, or any considerable number of persons. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed in which the Project Site is located. As such, the Project would not interfere with the implementation of a water quality control plan or applicable WDRs. Therefore, potential operational impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed in the Geotechnical Report included as Appendix D of this Initial Study, groundwater was not encountered to a depth of approximately 51 feet bgs, and the historical high groundwater was reported at a depth of more than 50 feet. The Project would include excavations approximately ten feet bgs. Based on the historically highest groundwater and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering may not be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations.

Further, development of the Project would require the export of approximately 8,310 cubic yards of soil. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements. During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal.

The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation

of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, construction of the Project would not violate any water quality standards or WDRs or otherwise substantially degrade groundwater quality. As construction activities are not expected to encounter existing groundwater supplies, it would not conflict with the implementation of a sustainable groundwater management plan. Therefore, impacts on groundwater quality would be less than significant. Therefore, potential operational impacts would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are currently operated or will be operated by the Project. In addition, while the development of the Project would include use of typical residential and retail and restaurant on-site hazardous materials such as paint, pesticides, and cleaning solvents, compliance with all applicable existing regulations at the Project Site regarding the handling of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. Therefore, Project operations would not violate any water quality standards or WDRs with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact.

Construction

As described in the Geotechnical Report, groundwater was not encountered during explorations to a depth of approximately 51 feet bgs, and excavation for the Project will reach a maximum depth of ten feet bgs. Therefore, excavation for the Project is not anticipated to encounter groundwater. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially deplete groundwater supplies, including in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table and impacts related to groundwater would be less than significant. No further evaluation of this topic in an EIR is required.

Operations

The Civil Engineering Report included as Appendix G of this Initial Study performed hydrologic calculations for the Project to calculate the 50-year, 24-hour storm event and 85th Percentile Storm Event for Water Quality purposes. The Project would implement measures to minimize flows leaving the Project Site and the post-developed condition would be equal to or less than the pre-developed condition.

Stormwater would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Additionally, with BMPs to control and treat stormwater runoff, implementation of the Project could potentially increase groundwater recharge.

As discussed above, groundwater is not expected to be encountered during construction. Additionally, there are no known groundwater wells within one mile of the Project Site. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Project construction activities, particularly including demolition and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff, including into nearby storm drains. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts regarding erosion and siltation would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

The Project would implement measures to minimize flows leaving the Project Site and the post-developed condition would be equal to or less than the pre-developed condition. The Project would be designed to maintain or reduce the current stormwater runoff by implementing measures to minimize flows leaving the site in accordance with applicable regulatory requirements. Stormwater would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow.

As discussed above, the Project must comply with the City's LID Ordinance requirements to retain, treat and/or filter stormwater runoff to mitigate the impacts of any post-development increases in runoff. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to erosion and siltation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact

Construction

There are no streams or rivers within or immediately surrounding the Project Site. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution under the general construction NPDES permit in addition to complying with applicable City regulations and requirements. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable stormwater regulations and City grading permit regulations, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project would implement measures to minimize flows leaving the Project Site and the post-developed condition would be equal to or less than the pre-developed condition. The Project's overflow would discharge to the storm drain system via sidewalk drains which will be sized using the 50-year storm event. In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captures and used, and/or treated through high efficient BMPs on-site for the volume of water produced by greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. As such, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site during operation. Therefore, operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As described above in Response Checklist Questions X.a and X.c.i, with the implementation of regulatory compliance requirements, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Project impacts on the capacity of stormwater

drainage systems and on polluted runoff would be less than significant. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

No Impact. As noted in the Geotechnical Report, based on the Flood Insurance Rate Map prepared by the Federal Emergency Management Agency (FEMA), the Project Site is not located within a flood hazard zone.[70] The City of Los Angeles Local Hazard Mitigation Plan indicates the Project Site is partially within a 0.2 Percent Annual Change Flood area.[71] In addition, no streams or rivers that may overflow or breech a levee are located on or near the Project Site. Thus, hazards related to flooding are minimal and the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner which would impede or redirect flood flows. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As noted in the Civil Engineering Report, based on the Flood Insurance Rate Map prepared by the Federal Emergency Management Agency (FEMA), the Project Site is not located within a flood hazard zone.[72] The City of Los Angeles Local Hazard Mitigation Plan indicates the Project Site is partially within a 0.2 Percent Annual Change Flood area.[73] Based on this information, the potential for flooding at the Project Site is considered low. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.[74,75] Further, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Project Site is located within the potential inundation area for the Los Angeles Department of Water and Power (LADWP) Hollywood Reservoir held by Mulholland Dam.[76] Built in 1924 to hold more than 2.5 billion gallons of water, Mulholland Dam is located in the City of Los Angeles within the former Weid Canyon, east of Cahuenga Pass and Highway 101 approximately 7.7 miles northwest of the Project Site.[77] This dam, as well as others in California, are continually monitored by the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum design basis earthquake for the site. Given the distance of the Mulholland

[70] Civil Engineering Report, David Evans and Associates, September 2024. Appendix G of this Initial Study.
[71] The City of Los Angeles 2024 Local Hazard Mitigation Plan, June 2024, https://drive.google.com/file/d/16UGVwkVmsP_jA5wMm5tUkdAKCEmgrDxF/view?usp=sharing, accessed January 22, 2025.
[72] Civil Engineering Report, David Evans and Associates, September 2024. Appendix G of this Initial Study.
[73] The City of Los Angeles 2024 Local Hazard Mitigation Plan, June 2024, https://drive.google.com/file/d/16UGVwkVmsP_jA5wMm5tUkdAKCEmgrDxF/view?usp=sharing, accessed January 22, 2025.
[74] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), http://zimas.lacity.org.
[75] California Department of Conservation, Los Angeles County Tsunami Hazard Areas, www.conservation.ca.gov/cgs/tsunami/maps/los-angeles, accessed December 21, 2023.
[76] Revised Limited Geotechnical Exploration 3801 to 3855 Flower Drive And 3822 to 3830 South Figueroa Street City Of Los Angeles, California (Geotechnical Report), Leighton and Associates, Inc., June 4, 2024
[77] Geotechnical Report, Leighton and Associates, Inc., June 4, 2024.

Dam to the Project Site and the oversight by the Division of Safety of Dams, including regular inspections, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. Therefore, the risk of flooding from a tsunami, inundation by a seiche, or dam failure is considered low. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs), which govern the implementation and enforcement of the California Water Code and the federal Clean Water Act. The Water Quality Control Plan (Basin Plan) for the Coastal Watershed of Los Angeles and Ventura Counties: (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and (iii) describes implementation programs to protect all waters in the region. In addition, the Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations related to maintaining and improving water quality.

Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in that region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site lies within the Ballona Creek Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for Ballona Creek under Clean Water Act Section 303(d) List include trash, toxic pollutants (cyanide), bacteria and viruses, metals (lead, copper, zinc), and sediment.[78]

Under the Regional Phase I Municipal Separate Storm Sewer System NPDES Permit (MS4 Permit), Order No. R4-202-0105, enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB) for Los Angeles and Ventura counties, all existing and future municipal and industrial stormwater discharges to surface waters within the City are subject to applicable local, State and/or federal regulations. The MS4 permit requires permittees to develop and implement BMPs during and after construction activities, such as the implementation of SWPPPs during the construction phase and LID BMPs for post construction, as applicable. The purpose of these BMPs are to reduce pollutant discharges from the stormwater conveyance systems during and post construction activities.

Potential pollutants generated by the Project would be typical of residential and retail and restaurant land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants to minimize pollutant loads in stormwater runoff. Implementation of LID features as part of the Project could result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. The Project would comply with all provisions of the NPDES program and other applicable NPDES permits and WDRs, and it would not obstruct

[78] California Environmental Protection Agency, State Water Resources Control Board, Impaired Water Bodies, www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml?wbid=CAT405170002000030110195l, accessed December 19, 2024.

implementation of the LARWQCB's Basin Plan. As such, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

a. Would the project physically divide an established community?

Less Than Significant Impact. The Project involves the development of a seven-story mixed-use residential and commercial development that includes 209 apartment units and 2,705 square feet of ground level retail and restaurant uses. Existing uses on the Project Site include seven two-story multi-family residential buildings along South Flower Drive, a two-story multi-family residential building, and surface parking along South Figueroa Street. The Project would remove the existing multi-family dwelling units and surface parking to construct the Project.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential, and public facilities uses. The surrounding properties are generally zoned C2-1L, RD1.5-1, and PF-1, which are generally consistent with the zoning on the Project Site. The proposed uses would be consistent with existing land uses in the surrounding area. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in infill development of an already developed community with similar and compatible land uses. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. The Project requests several discretionary approvals, including but not limited to Density Bonus waivers and incentives, Project Review, and a Vesting Tentative Tract Map. Additionally, the Project could potentially conflict with land use plans, policies, or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. In light of the various

discretionary entitlements being sought by the Project, further analysis of the Project's consistency with the LAMC and other applicable land use plans, policies, and regulations will be included in the EIR.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. The Project Site is located within a Mineral Resource Zone 2 Area (MRZ-2)[79] which identifies "areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists".[80,81]

As noted in the South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, although these areas are classified as MRZ-2, no aggregate mineral extraction activities currently occur in the South Los Angeles and Southeast Los Angeles Community Plan areas. These areas are built out with urban uses making them inaccessible for such activities.[82] The Project Site is also not located within a City-designated oil field or oil drilling area, and no oil wells are present on the Project Site.[83]

Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

[79] South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, 2016.
[80] South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, 2016.
[81] Ibid.
[82] Ibid.
[83] Phase I Environmental Site Assessment, Kimley-Horn, August 2024. Appendix F of this Initial Study.

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

No Impact. Although the Project Site is located within a City-designated MRZ-2, the Project Site is not within a mineral producing area as classified by the California Geologic Survey.[84] Furthermore, no mineral extraction operations currently occur on the Project Site. As stated above, the Project Site is located within an urbanized area and has been previously graded and developed. As such, the potential for mineral resources to occur on-site is low.

Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site. No impacts would occur, and no further evaluation in the EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

Potentially Significant Impact. Construction activities would include demolition, site preparation, grading, infrastructure improvements, paving, building construction, and architectural coating. Noise generated by construction equipment would generate noise on a short-term basis. In addition, since the Project would increase residential density compared to existing conditions and develop new retail and restaurant uses, noise levels from on-site sources may increase during Project operation. Traffic

[84] Mineral Land Classification, California Mineral Resources Data Portal Web, App 3, https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification#data_s=id%3AdataSource_335-18a47b5b8e5-layer-10-192c08351d6-layer-28%3A4 , accessed January 24, 2025.

attributed to the Project also has the potential to increase noise levels along adjacent roadways. Therefore, the EIR will provide further analysis of this issue.

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

Potentially Significant Impact. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. Construction of the Project could generate groundborne noise and vibration in association with construction activities such as demolition, site grading, and installation of new building. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, the EIR will provide further analysis of this issue.

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

No Impact. There are no private airstrips in the vicinity of the Project Site. The nearest airport to the Project Site is the Los Angeles International Airport approximately nine miles southwest of the Project Site. As the Project Site is located further than two miles from a public airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

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

Less Than Significant Impact. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 1,398,600 in 2019 to

1,828,200 in 2050, an increase of 429,600 households.[85] The Project would include 209 units which would provide replacement housing for approximately 51 units. Therefore, the net number of new units on the Project Site would be 158 units.

Additionally, the City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40 percent) are designated for very low and low-income households.[86]

The Project's proposed net 158 units would represent 0.03 percent of the number of new units planned to be constructed by the City per the Housing Element. The Project's anticipated contribution to net household growth in the City (158 households) would represent 0.04 percent of the City's anticipated household growth between 2019 and 2050 forecasted by SCAG, and 0.03 percent of the City's anticipated household growth between 2021 and 2029 forecasted by the City's General Plan Housing Element. Thus, the Project's estimated household growth would be within regional growth projections for the City.

Based on the City's average household size of 2.7, the increase of 429,600 households under the RTP/SCS in the City between 2019 and 2050 would result in an approximate increase of 1,159,920 persons in the City between 2019 and 2050.[87] When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area which is higher than the City, the Project's net 158 proposed units would result in a population increase of approximately 529 residents. The Project's anticipated population growth (529 persons) would represent 0.04 percent of the City's anticipated growth between 2019 and 2050. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Project construction would result in increased employment opportunities in the construction field, which could potentially result in increased population and housing demand in the City. However, it is assumed that construction labor for the Project would be provided by the existing local workforce in Los Angeles and in the surrounding communities. Construction workers would typically remain at a job site for the time frame in which they are needed, whether for a particular phase of Project construction or until construction is completed. Therefore, Project construction is not anticipated to require workers to relocate permanently to the City as a consequence of working on the Project, thereby resulting in substantial unplanned population growth due to an increase in workforce.

Overall, although the Project may result in direct population growth from future residents relocating to the City, the Project would not induce substantial unplanned population growth exceeding regional population projections. Impacts would be less than significant, and no further evaluation in the EIR is required.

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

Less Than Significant Impact. The Project would result in the replacement of 51 residential units with 209 mixed-income units, which would include 42 affordable units, with four units designated for Extremely

[85] SCAG, Connect SoCal 2024 Demographics and Growth Forecast, April 4, 2024, page 39, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839, accessed August 2, 2024.

[86] City of Los Angeles, 2021-2029 Housing Element. https://planning.lacity.gov/odocument/3d0775b4-6e54-4294-ad5a-85df6b8eaf82/Executive_Summary_(Adopted).pdf, accessed August 30, 2024.

[87] SCAG, Connect SoCal 2024 Demographics and Growth Forecast, April 4, 2024, page 39, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839, accessed August 2, 2024.

Low Income Households, 22 units designated for Very Low Income and 16 units designated for Low Income Households. The Project's 209 units would exceed the number of existing housing units that would be displaced by the Project, for a net increase of158 units.

As stated above, the most recent estimated household size for housing units in the South Los Angeles Community Plan area is 3.35 persons per unit.[88] Applying this factor, the displacement of 51 existing units would result in the displacement of approximately 171 existing residents. However, as discussed above, the Project would provide 158 net new units, (including 42 affordable units) providing housing opportunities for approximately 529 residents, greater than the number of residents that would be displaced.

The Project's 209 units would exceed the number of existing housing units that would be displaced by the Project and would provide a net increase of 158 units on the Project Site. Furthermore, all existing households would be subject to the RSO and lower income households on the Project Site are entitled to relocation benefits subject to Government Code Section 7260 et seq., and the right of first refusal (Right to Return) to a comparable unit (same bedroom type) when the Project is completed.

Therefore, the Project would not displace substantial numbers of people necessitating the construction of replacement housing elsewhere. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Fire protection?

Potentially Significant Impact. Fire protection services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The Project would result in the construction of 209 housing units

[88] Los Angeles Department of City Planning, South Los Angeles Demographic Profile, https://planning.lacity.gov/odocument/a547cb71-0d86-47d3-9717-d6059dea27e0/standard_report2022_SOUTH_LA_mail.pdf, accessed January 16, 2025.

and demolition of 51 units, which would increase the number of residents on the Project Site by approximately 529. In addition, development of the retail and restaurant uses would generate new employment within the Project vicinity. Thus, the Project has the potential to result in an increase in the demand for LAFD fire protection services. Therefore, further evaluation of this topic will be provided in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection services for the Project Site are provided by the City of Los Angeles Police Department (LAPD). As discussed above, the Project would result in a net increase in the number residents and new employees on the Project Site. Thus, the Project has the potential to result in an increase in the demand for LAPD police protection services. Therefore, further evaluation of this topic will be provided in the EIR.

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The Project Site is located within the attendance boundaries of Menlo Avenue Elementary School, William Jefferson Clinton Middle School, and Manual Arts High School. As noted by the LAUSD, no new school construction is planned.[89] According to the LAUSD, for the school calendar year of 2023-2024, the William Jefferson Clinton Middle School is over capacity by 177 seats, with no overages reported for Menlo Avenue Elementary School or Manual Arts High School. According to five-year capacity projections for these three schools, there are no anticipated future overcrowding or over capacity issues.[90]

Construction

Given the temporary nature of work on the Project Site and given the large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences (and, therefore, a student population) within this region or move from other regions as a result of their temporary work on the Project Site. Therefore, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools. Impacts would be less than significant.

Operation

The Project could generate a net increase of 32 elementary students, ten middle school students, 17 high school students, and four special day care students for a total of 63 students.[91] This would be an incremental increase in student population that would have a negligible impact on the schools serving the Project Site. It should be noted that this analysis also includes students who may enroll in private schools or participate in home schooling. In addition, this analysis does not account for Project residents who may already reside within the school attendance boundaries and would move to the Project Site.

Pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such

[90] Ibid.

[91] See School Enrollment Calculations, Appendix H-2 of this Initial Study, for detailed calculations.

fees is deemed full mitigation of a project's development impacts.[92] Project operational impacts to schools would be less than significant. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. Therefore, operational impacts on schools would be less than significant. No further evaluation of this topic in an EIR is required.

d. Parks?

Less Than Significant Impact

Construction

Given the temporary nature of construction activities, construction of the Project would not introduce a permanent population to an area which could result in an increase in the use of the existing parks and recreational facilities that would result in the need for new parks or recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work location and are more likely to utilize parks and recreation facilities near their places of residence. Thus, construction of the Project would not generate a demand for park facilities adequately accommodated by existing or planned facilities and services. Impacts on parks during Project construction would be less than significant.

Operation

Parks and recreational services are provided by the Los Angeles Department of Recreation and Parks (RAP). The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. RAP has identified 18 neighborhood parks are located within a two-mile radius of the Project Site, 54 community parks located within a five-mile radius of the Project Site, and 15 regional parks located within a ten-mile radius of the Project Site.[93] For a comprehensive list, see Appendix H-1, Public Services Correspondence, of this Draft EIR.

The South Los Angeles Community Plan Area has a parkland acres-to-population ratio of 0.31 acres per 1,000 residents. The Public Recreation Plan, a portion of the Public Facilities and Services Element of the City's General Plan, sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 2.0 acres per 1,000 residents.[94]

According to the Los Angeles General Plan Public Recreation Plan, an overall provision of ten acres of land per 1,000 residents for total recreational facilities is recommended, and a minimum of ten percent of the City's total land area should be dedicated to public recreation or open space. The City's Open Space Element recommends that private developments provide open spaces, wherever practical, for the benefit of the public as a whole to help fulfill the recreational needs of the City.

An increase in the use of existing park and recreational facilities is directly associated with an increase in population. When utilizing the average household size of 3.35 for the South Los Angeles Community

[92] Government Code Section 65995(h) states in part: "The payment or satisfaction of a fee … specified in Section 65995 …are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property … on the provision of adequate school facilities."

[93] Correspondence from Cathie M. Santo Domingo, Assistant General Manager and Darryl Ford Superintendent, Los Angeles Department of Recreation and Parks, dated August 29, 2024. Appendix H-1 of this Initial Study.

[94] City of Los Angeles General Plan, Public Facilities and Services Element, January 1969, https://planning.lacity.gov/odocument/43319adf-80e9-4080-8d1d-ed7b3d3e2607/Public%20Facilities.pdf, accessed February 18, 2025.

Plan area, the Project's net increase of 158 units would result in a population increase of 529 residents. The Project would provide a total of 23,127 square feet of open space per LAMC requirements. Open space would consist of 300 square feet of private patios, 14,865 square feet of courtyard areas on the first and second floors, 2,252 square feet of roof decks on the seventh floor and 5,710 square feet of various indoor amenities such as a club room, fitness room, and lounge area. Due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site parks or recreational facilities given the provision of on-site open space and recreational amenities. Compliance with regulatory requirements including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant. No further evaluation of this topic in an EIR is required.

e. Other public facilities?

Less Than Significant Impact. Other public facilities include library facilities. The City of Los Angeles Public Library (LAPL) provides library facilities and services to the City of Los Angeles, including the Project Site. The LAPL consists of the Central Library and 72 branch libraries as well as web-based resources.[95]

The Project would be served by the following libraries: Junipero Serra Branch Library (one mile southeast of the Project Site), Exposition Park - Dr. Mary McLeod Bethune Regional Branch Library (1.5 miles west of the Project Site), Vermont Square Branch Library (1.3 miles southwest of the Project Site).[96]

Construction

Given the temporary nature of construction activities, construction of the Project would not introduce a permanent population to an area which could result in an increase in the use of the existing library facilities that would result in the need for library facilities or the expansion of existing facilities. Additionally, the use of library facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work location and are more likely to utilize library facilities near their places of residence. Thus, construction of the Project would not generate a demand for library facilities adequately accommodated by existing or planned facilities and services. Impacts on libraries during Project construction would be less than significant.

Operation

The new residential population generated by the Project could result in additional demand for library services provided by the LAPL. However, while the new residents generated by the Project would be anticipated to visit the library facilities serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Also, while the Project's commercial component could result in a demand for library services, it is expected

[95] https://lapl.org/branches

[96] Correspondence from Aurial Granger, Management Analyst, Los Angeles Public Library, dated August 22, 2024. Appendix H-1 of this Initial Study.

that employees of the commercial uses would prefer to use library facilities near their places of residence when not at the Project Site.

Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and its vicinity, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Therefore, with the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, the impact on library facilities during the operation of the Project would be less than significant. No further evaluation of this topic in an EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed above, parks and recreational facilities in the vicinity of the Project Site are primarily cooperated and maintained by RAP. The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. RAP has identified the following parks in the Project vicinity: 18 neighborhood parks are located within a two-mile radius of the Project Site; 54 community parks located within a five-mile radius of the Project Site; and 15 regional parks located within a ten-mile radius of the Project Site.[97] For a comprehensive list, see Appendix H-1, Public Services Correspondence, of this Draft EIR.

[97] Correspondence from Cathie M. Santo Domingo, Assistant General Manager and Darryl Ford Superintendent, Los Angeles Department of Recreation and Parks, dated August 29, 2024. Appendix H-1 of this Initial Study.

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. The Project would provide a total of 23,127 square feet of open space per LAMC requirements. Open space would consist of 300 square feet of private patios, 14,865 square feet of courtyard areas on the first and second floors, 2,252 square feet of two roof decks on the seventh floor and 5,710 square feet of various indoor amenities such as a club room, fitness room and lounge area.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements which would be used to increase recreational opportunities for Project residents and improve existing parks. Thus, based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant. No mitigation measures are required, and no further analysis of the issue in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project would provide 23,127 square feet of open space per LAMC requirements. Open space would consist of 300 square feet of private patios, 14,865 square feet of courtyard areas on the first and second floors, 2,252 square feet of roof decks on the seventh floor and 5,710 square feet of various indoor amenities such as a club room, fitness room, and lounge area.

The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities, existing parks in the Project vicinity, and payment of park fees, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment, as discussed throughout this Initial Study. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and impacts would be less than significant. No mitigation measures are required, and no further analysis of the issue in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

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

Potentially Significant Impact. The City requires the preparation and submission of a Transportation Assessment for projects that meet the following criteria:

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.
- A transportation assessment is required by City ordinance or regulation.

The Project is a new mixed-use development in an urban area. During Project operation, the Project is anticipated to generate increased vehicle, bicycle, pedestrian, and transit trips, resulting in an increase in the use of the Project area's transportation facilities as compared to the existing uses as well as an increase in associated VMT. A Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the transportation assessment's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. CEQA Guidelines Section 15064.3(b) provides standards for determining the significance of transportation impacts utilizing the VMT standard. On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update also establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts. In accordance with these requirements, a Transportation Assessment will be prepared for the Project to evaluate the Project's potential transportation impacts. Therefore, further evaluation of this topic will be provided in the EIR.

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

Less Than Significant Impact. Primary vehicular access to the Project Site would be provided via a new driveway with an access gate along South Flower Drive that would provide ingress and egress into the Project. The driveway includes an access gate that would control ingress and egress into the Project's at-grade residential and commercial parking garage. The Project's access locations would comply with City standards and safety requirements, which mandate providing adequate sight lines, safe distances to potential conflicts, traversable sidewalks, crosswalks and pedestrian movement controls. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and no further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact. Emergency access is determined by the number of private and public access points, the width of the access points, and internal roadways serving a Project Site. Primary vehicular access to the Project Site would be provided via a new driveway with an access gate along South Flower Drive that would provide access into the Project Site. Pedestrian access to the Project Site is provided via sidewalks located along South Figueroa Street, West 38th Street, and South Flower Street. Project Site design, including automobile and pedestrian access, would comply with the City's design standards and other requirements as established by state law, the LAMC, and the LAFD. During construction, traffic on South Figueroa Street and South Flower Drive could be intermittently disrupted due to vehicle loading and unloading. Such intermittent travel lane closures may disrupt local traffic. Therefore, further evaluation of this topic will be provided in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

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

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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

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

Potentially Significant Impact (a and b). Assembly Bill (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of the receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request of consultation. In compliance with AB 52, the City mailed a project notification letter to all applicable tribes on March 26, 2025.

The Project's construction actives could potentially disturb existing but undiscovered tribal resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred

place, or object with cultural value to a California Native American Tribe. Further analysis of this topic including the results of the AB 52 process will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The following discussion is based on the Civil Engineering Report, prepared by David Evans and Associates, dated August 2024. The Civil Engineering Report is included in Appendix G.

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

Less Than Significant Impact

Water

The Project Site is currently serviced by the LADWP. According to the Civil Engineering Report prepared for the Project included in Appendix G of this Initial Study, there is an existing 16-inch water main in South Figueroa Street and a four-inch water main in South Flower Drive, which are connected by a six-inch water main in West 38th Street and an eight-inch water main in West 39th Street. Additionally, there are three fire hydrants located in the vicinity of the Project Site at the southwest corner of West 38th Street and Flower Drive, the northwest corner of West 39th Street and South Flower Drive, and the southwest corner of Exposition Park Drive and South Figueroa Street.

Construction

Water for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction of soil. The estimated construction-period demand would be significantly less than the Project's estimated operational demand, which as described below, can be accommodated by the existing infrastructure. It can therefore be reasonably inferred that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

The Project would require new, on-site water distribution lines to serve the new building that would connect to the existing water mains. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below surface and would be limited to on-site water distribution. No off-site utility work would be conducted other than connecting the Project's utilities to mains, which would be temporary in nature. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines and LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s). As such, construction activities would not encroach on public water utility distribution lines.

Therefore, construction of the Project would not require the relocation or construction of new or expanded water facilities related to construction of the Project. Therefore, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

Water consumption estimates during operation of the Project are shown in **Table 5: Estimated Water Demand for the Project**, which is based on California Plumbing Code Appendix A. As shown below, the anticipated water demand for the Project is 37,984 gallons per day (gpd), compared to the existing water demand of 8,976 gpd, for a net water demand of 29,008 gpd.

Table 5: Estimated Water Demand for the Project

Land Use	Units	Water Consumption Rate (gpd/unit)[1]	Total Water Demand (gpd)
Existing Uses			
Studio	25 units	176 gpd/unit	4,400
One-Bedroom	13 units	176 gpd/unit	2,288
Two-Bedroom	12 units	176 gpd/unit	2,112
Three-Bedroom	1 unit	176 gpd/unit	176
Total Existing Water Demand			**8,976**

Land Use	Units	Water Consumption Rate (gpd/unit)[1]	Total Water Demand (gpd)
Proposed Uses			
Studio	34 units	176 gpd/unit	5,984
One-Bedroom	43 units	176 gpd/unit	7,568
Two-Bedroom	45 units	176 gpd/unit	7,920
Three-Bedroom	34 units	176 gpd/unit	5,984
Four-Bedroom	53 units	176 gpd/unit	9,328
Fast Food Restaurant	50 seats	24 gpd/seat	1,200
Total Proposed Water Demand			**37,984**
Net Increase			**29,008**
Source: Civil Engineering Report, prepared by David Evans and Associates, dated September 2024 (**Appendix G**)			

The Project would be serviced by a six-inch domestic and six-inch fire combination water meter. Fire service water would be piped into the proposed development from the meter. The Project would include automatic sprinklers on all floors of the proposed building. Further coordination with the LAFD would be conducted during Project Review to determine the fire flow requirements from adjacent hydrants and whether additional hydrants are necessary. An Information on Fire Flow Analysis (IFFA) application was submitted to the County of Los Angeles Fire Department, Fire Prevention Division on July 23, 2024, for the three fire hydrants in the vicinity of the Project Site. The IFFA reports that each of the fire hydrants have available fire flow of 1,500 gallons per minute at a pressure of 20 pounds per square inch (psi), with a combined flow of 4,500 gallons per minute at a pressure of 20 psi.

In addition, a Service Advisory Request (SAR) was submitted to LADWP for connection to the 16-inch water main on South Figueroa Street, to determine the water pressure of the water main lines and whether they would be able to accommodate a six-inch domestic and six-inch fire water combination meter. The 16-inch water main on South Figueroa Street was found to have sufficient pressure to handle the proposed combination meter with a pressure of 73 psi at 1400 gallons per minute. Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project, and the Project would not require the relocation or construction of new or expanded water facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Wastewater Treatment

The City's wastewater system - sewers and treatment plants - operates 24 hours a day, 365 days a year to serve the needs of more than four million customers in Los Angeles, plus 29 contracting cities and agencies. There are ongoing construction projects to ensure service remains available to all of the residents in the City of Los Angeles.[98] The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer

[98] LASAN, Sewers and Pumping Plants, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-s?_afrLoop=9807856666028587&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=139hebij44_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9807856666028587%26_afrWindowMode%3D0%26_adf.ctrl-state%3D139hebij44_5, accessed January 21, 2025.

System, and Regional Sanitary Sewer System.[99] The Project Site is located within the Hyperion Sewer System service area, which is operated and maintained by Los Angeles Sanitation and Environment (LASAN). The existing design capacity of the Hyperion Sewer System service area is approximately 550 million gallons per day (mgd), which consists of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant.[100][101, 102]

Existing sewer lines in the vicinity of the Project Site include a 12-inch vitrified clay pipe (VCP) main sewer line in South Figueroa Street, an eight-inch VCP main sewer line in West 38th Street, and an eight-inch VCP main in South Flower Drive. All sewer lines in the vicinity of the Project Site are owned and maintained by the City, and flow from east to west and north to south. Sewage enters the eight-inch line in West 38th Street and then flows west to join the 12-inch line in South Figueroa Street which runs south. Project sewage would enter the eight-inch line in South Flower Drive, flow south to the ten-inch line in West 39th Street and flow west to join the 12-inch line in Figueroa.

Construction

Wastewater would be generated throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms and handwashing stations, which would not contribute to wastewater flows to the City's wastewater system. Sewage from these facilities would be collected and hauled off-site and not discharged into the public sewer system serving the Project Site. Thus, wastewater generation resulting from Project construction activities is not anticipated to cause an increase in wastewater flows. Construction impacts associated with the installation of new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and no off-site work associated with connections to the public sewage main would be conducted. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, the Project impact on wastewater associated with construction activities would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

A will-serve letter and Sewer Capacity Availability Request (SCAR) were obtained from the City, to determine if the existing public sewer systems have available and adequate capacity to convey sewage from the Project Site. The SCAR approves 100 percent of the anticipated sewer flow generated by the

[99] LASAN, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 29, 2024.

[100] LASAN, Treatment Process, https://sanitation.lacity.gov/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=7m1votmrt_224&_afrLoop=9881798326374624#!, accessed January 22, 2025.

[101] LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=17jkelqawo_82&_afrLoop=21735430323215481#!, accessed August 29, 2024.

[102] LASAN, Los Angeles – Glendale Water Reclamation Plant, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_afrLoop=9881480674780251&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=7m1votmrt_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9881480674780251%26_afrWindowMode%3D0%26_adf.ctrl-state%3D7m1votmrt_5, accessed January 22, 2025.

Project, which is estimated to be 33,930 gpd with 50 percent of the flow discharging to the main line in South Flower Drive and 50 percent to the main line in South Figueroa Street.

The estimated sewer flows for the new development on the Project Site were based on the sewer generation rates per the City of Los Angeles Sewer Generation Factors Table.[103] As represented in **Table 6: Estimated Wastewater for the Project**, the anticipated Project demand is 33,930 gpd compared to the existing demand of 5,295 gpd, resulting in a net demand of 28,635 gpd.

Table 6: Estimated Wastewater for the Project

Land Use	Units	Wastewater Generation Rate (gpd/unit)[1]	Total Wastewater Generation (gpd)
Existing Uses			
Studio	25 units	75 gpd/unit	1,875
One Bedroom	13 units	110 gpd/unit	1,430
Two Bedroom	12 units	150 gpd/unit	1,800
Three Bedroom	1 unit	190 gpd/unit	190
Total Existing Water Demand			**5,295**
Proposed Uses			
Studio	34 units	75 gpd/unit	2,550
One Bedroom	43 units	110 gpd/unit	4,730
Two Bedroom	45 units	150 gpd/unit	6,750
Three Bedroom	34 units	190 gpd/unit	6,460
Four Bedroom	53 units	230 gpd/unit	12,190
Fast Food Restaurant	50 seats	25 gpd/seat	1,250
Total Proposed Water Demand			**33,930**
Net Increase			**28,635**

Source: Civil Engineering Report, prepared by David Evans and Associates, dated September 2024. (**Appendix G**)

As discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). Beginning in December 2011, California began experiencing the longest duration of drought on record. This has led to increased conservation for water resources, and significant reductions in wastewater flows conveyed by the City's collection system over the past decade. An indication of this is the wastewater flow at Hyperion, which went from approximately 350 mgd to 260 mgd average daily flow.[104] As such, the Hyperion Treatment Plant currently treats an average daily flow of approximately 260 mgd, resulting in an available treatment capacity of 190 mgd. The Project would account for approximately 0.02 percent of the available capacity of the Hyperion Treatment Plant.[105] Therefore, there would be adequate capacity available to accommodate the wastewater generated by the Project, and the Project would not require

[103] LASAN, Table 1: Loadings for Each Class of Land Use, https://www.lacsd.org/home/showpublisheddocument/3644/63764457548980, accessed January 21, 2025.

[104] LASAN, Table 1: Sewer Management Plan. Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 29, 2024.

[105] LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2023.

the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Stormwater Drainage

The Project would be subject to the provisions of the City's LID Ordinance (Ordinance 183,833). The Project would be designed to maintain or reduce the current stormwater runoff by implementing measures to minimize flows leaving the Project Site, such as implementing a drywell system.[106] As noted in the Civil Engineering Report included in Appendix G of this Initial Study,, preliminary LID calculations result in a total required mitigation volume of 5,121 cubic feet. The Project's overflow would discharge to the storm drain system via under sidewalk drains which would be sized using the 50-year storm standard in accordance with City code requirements.

Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with NPDES Permit requirements.

Environmental impacts associated with the development of the Project, including on-site drainage facilities, have been evaluated throughout this Initial Study. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities would be less than significant with the implementation of regulatory compliance requirements. Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Electric Power

Electricity transmission to the Project Site is provided and maintained by LADWP through overhead lines running north and south roughly through the Project Site from West 38th Street to West 39th Street. Additionally, an existing four-foot-wide utility easement is located on-site for overhead power lines. A will-serve letter was received from LADWP on July 12, 2023, included in Appendix G, which notes that electric service is available and will be provided in accordance with the LADWP Rules and Regulations. The estimated power requirement for the Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system. Additionally, according to the Civil Engineering Report, the existing power lines running at the rear of the existing lots down the center of the block would need to be placed underground. Coordination with LADWP would be required to obtain permission to construct within the existing easement. During this off-site work, the Project would be required to coordinate with LADWP to ensure that pedestrian and traffic impacts during construction would be minimal, including maintaining lanes of travel and ensuring safe pedestrian access and

[106] A system of drywells would facilitate the infiltration of stormwater at the site, with overflow directed to the adjacent storm drain system. A state-of-the-art drywell would be designed to infiltrate stormwater into native soils to recharge groundwater reserves and mimic the natural/pre-development water cycle. Each system includes one or two pre-treatment chambers that remove pollutants through settling, screening, and hydrocarbon absorption.

adequate emergency access. As such, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Natural Gas

The Southern California Gas Company (SCG) serves the City of Los Angeles. Record maps and a will-serve letter were received from SCG. According to the Civil Engineering Report, existing natural gas facilities in the vicinity of the Project Site include a three-inch line in South Figueroa Street and a two-inch line in South Flower Drive. The Project would connect to these same lines and would not require the relocation or expansion of existing natural gas utility facilities. According to the will-serve letter from SCG, the Project would be in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made. As such, the Project would not require the relocation of natural gas facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Telecommunications

Any new telecommunication connections would be constructed by the private utility service provider would follow all appropriate regulatory requirements. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would not result in the relocation or construction of new off-site telecommunication facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As stated above, the Project is expected to increase water demand by 29,008 gpd. The Project would be designed to meet CALGreen and the Title 24 Building Standards Code. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

The LADWP's 2020 Urban Water Management Plan (2020 UWMP) addresses the future of the City's water supplies and demand through the year 2045. To determine the overall service area reliability, the 2020 UWMP included three hydrologic conditions: average year (30-year median hydrology from fiscal year [FY] 1985/86 to FY 2014/15); single dry year (repeat of the 1989/90 hydrology); and multi-dry year (FY 1987/88 to FY 1991/92 hydrology). As noted in the 2020 UWMP, LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios through 2045. Achieving LADWP's water supply would include multiple strategies to achieve and maintain water use reductions, including investments in state-of-the-art technology, recycled water, stormwater recapture, installation of water-efficient fixtures and appliances, expansion and enforcement of prohibited water uses, reductions in outdoor water use, extending education and outreach efforts, and encouraging regional conservation efforts. Conservation and water use efficiency are a foundational component of LADWP's water resource planning efforts and will continue to be central to the City's water use efficiency goals over the long term.[107]

[107] Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, https://www.ladwp.com/sites/default/files/documents/LADWP_2020_UWMP_Web.pdf, accessed January 22, 2025.

According to the reliability data in the 2020 UWMP, the most recent plan available, for a single dry year, LADWP has sufficient supply to meet a total water demand of 746,000 in acre-feet (af) by the year 2045; LADWP has programs to reduce the demand to 565,800 af by 2045, a difference of 180,200 af. For the multi-dry year scenario, LADWP has sufficient supply to meet total water demands ranging from 724,400 af to 746,000 af and reduce the demand to 565,700 af for each year in the multi-dry year scenario, resulting in a difference ranging from 158,700 af to 180,300 af. As noted in the 2020 UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people, and reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavioral changes in users resulting from customer outreach, educational programs, and various other implementation strategies.

The 2020 UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Section 4.14, *Population and Housing*, the Project's employment contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at four-year intervals to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion as long as the resulting growth does not exceed the growth projections. The 2020 UWMP is updated at regular five-year cycles and includes programs to meet the supply requirements. The Project's increase in water demand of 29,008 gpd, or 32.5 afy, would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.

As there would be sufficient water supplies available to serve the Project, impacts regarding water supply would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As stated in Section 4.19.a, the Project would generate approximately 33,930 gpd compared to the existing demand of 5,295 gpd, resulting in a net demand of 28,635 gpd. Given its current capacity, the Hyperion Service Area would have adequate capacity to serve the Project's wastewater generation, and the BOS would have adequate capacity to serve the Project. Therefore, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles 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 of Los Angeles BOS is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

In 2021, the total amount of solid waste disposed of at in-county Class III landfills, permitted inert landfills, transformation facilities, and out-of-County landfills was approximately 11.5 million tons.[108] The remaining permitted disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 187.9 million tons as of July 2021, the most recent data available.[109] As of July 2021, waste from the City of Los Angeles was disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 187.9 million tons of remaining capacity within the County, 52.22 million tons, or approximately 28 percent, was located at Sunshine Canyon landfill, which has a remaining life of 16 years; and 51.63 million tons, or approximately 28 percent, was located at the Chiquita Canyon landfill. In addition to in-County landfills, out-of-County disposal facilities are also available to the City of Los Angeles. However, effective January 1, 2025, Chiquita Canyon Landfill closed active waste disposal operations. The County plans to conduct a comprehensive assessment of the closure's implications, including its effect on waste disposal operations.[110] Nevertheless, given that the total remaining permitted disposal capacity for the County's landfills without Chiquita Canyon landfill would be approximately 136.3 million tons and that out-of-County disposal facilities also continue to have availability to accept solid waste, the remaining County landfills have sufficient capacity to accommodate solid waste even with the closure of the Chiquita Canyon Landfill.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, export of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.[111]

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at construction and demolition (C&D) facilities

[108] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, Appendix E-2. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

[109] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, Appendix E-2. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

[110] KTLA, Castaic landfill to close after years of odor complaints, Southern California landfill to close after years of odor complaints, accessed January 22, 2025.

[111] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

pursuant to new policies and programs, and the development of future recycling facilities.[112] As shown in **Table 7: Estimated C&D Solid Waste for the Project**, the Project is estimated to generate approximately 1,951 tons of C&D solid waste per day without diversion, and 488 tons of C&D solid waste per day after diversion.

Table 7: Estimated C&D Solid Waste for the Project

Land Use	Units	Solid Waste Generation Rate	Total Solid Waste Generation (lbs/day)	Total Solid Waste Generation (tons/day)
Demolition				
Multi-Family Residential	31,.400 sf	0.046 tons/sf[1]	2,888,800	1,444.4
Construction				
Multi-Family Residential	252,148 sf	4.02 lb/sf[2]	1,013,635	506.8
Total C&D Solid Waste			**3,902,435**	**1,951**
Total After 75-Percent Recycling			**975,609**	**488**

sf = square feet
[1]Demolition solid waste generation rate is based on CALEEMod User Guide Appendix A, page 13.
[2]Construction solid waste generation rate is based on U.S. Environmental Protection Agency, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.

Solid waste generated by construction and operation of the Project could be accommodated by the County's available regional landfills, as discussed above. Furthermore, the Project waste generated by the construction would be subject to State and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025. Project construction would include the demolition of the existing buildings and vacant lot on-site. Demolition waste would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain Assembly Bill (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 84 percent. Additionally, pursuant to the requirements of SB 1374,[113] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris.

For Project operations, the estimated solid waste generation for the Project is based on the solid waste generation rates per the California Department of Resources Recycling and Recovery (CalRecycle's) Estimated Solid Waste Generation Rates. As represented in **Table 8: Estimated Solid Waste for the Project**, the anticipated Project demand is 0.924 tons per day (tpd), compared to the existing demand of 0.219 tpd, resulting in a net demand of 0.705 tpd.

[112] LASAN, Solid Waste Integrated Resources Plan, https://sanitation.lacity.gov/san/sandocview?docname=cnt012522, accessed January 22, 2025.
[113] Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Table 8: Estimated Solid Waste for the Project

Land Use	Units	Solid Waste Generation Rate[1]	Total Solid Waste Generation (lbs/day)	Total Solid Waste Generation (tons/day)
Existing Uses				
Multi-family Residential	51 units	8.6 lb/unit/day	438.6	0.219
Total Existing Solid Waste Demand			*438.6*	*0.219*
Proposed Uses				
Multi-family Residential	209 units	8.6 lb/unit/day	1,797	0.899
Fast Food Restaurant	50 seats	1 lb/seat/day	50	0.025
Total Proposed Solid Waste Demand			*1,847*	*0.924*
Net Increase			***1,409***	***0.705***

[1] *Solid waste generation rates are based on CalRecycle's Estimated Solid Waste Generation Rates.* ***https://www2.calrecycle.ca.gov/wastecharacterization/general/rates****, accessed* ***February 24, 2025.***

The amount of solid waste generated by the Project is within the available capacities of area landfills, would not impair the attainment of solid waste reduction goals, and the Project's impacts to regional landfill capacity would be less than significant. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expanding opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week have been required to arrange for organic waste recycling services. In

addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week have been required to arrange for organic waste recycling services.

The City's SWIRP provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate is currently becoming implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities pursuant to new policies and programs, and the development of future recycling facilities.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[114] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, as well as the LASAN Blue Bin Recycling Program.[115] In addition, as discussed above, pursuant to the requirements of SB 1374,[116] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris, and pursuant to LAMC Sections 66.32.1 through 66.32.5 (the City's Construction and Demolition Waste Recycling Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

[114] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

[115] LASAN, Blue Bin Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afrLoop=5296551634977190&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=bghkbdldv_78#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5296551634977190%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dbghkbdldv_82, accessed December 23, 2024.

[116] Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact. The Project Site is located in a highly developed and urbanized area that is not susceptible to wildfires. The Project Site is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[117,118] Additionally, according to the CalFire Hazard Severity Zone Viewer, the Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) in either the State Responsibility Area (SRA) or a Local Responsibility Area (LRA).[119] The nearest VHFHSZ in a State Responsibility Area is located 14 miles east of the Project Site. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.

[117] City of Los Angeles, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), https://zimas.lacity.org/, accessed July 25, 2024.

[118] City of Los Angeles. City of Los Angeles General Plan Safety Element p. 27. https://planning.lacity.gov/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf, accessed July 25, 2024.

[119] CALFIRE. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, accessed July 25, 2024.

The Project would not impair an adopted wildfire emergency response plan or emergency evacuation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is relatively flat and is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. In addition, there are no wildland or steep slopes located in the vicinity of the Project Site. Therefore, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is relatively flat, located in an urban area and is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Project design and site access would be required to adhere to the requirements of the LAFD. As the Project is not located within or near state responsibility area or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as road, fuel breaks or emergency water sources to assist with fire suppression in a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

No Impact. As discussed above, the Project Site is relatively flat, located in an urban area and is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.

The Project Site is located on a flat urban area and is not located on a hillside area downstream of potential flooding, post-fire instability, or landslides. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. Thus, the Project does not have the potential to 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, or reduce the number or restrict the range of a rare or endangered plant or animal species. However, the Project would remove buildings that are part of a historic district and therefore, the Project could eliminate important examples of a period of California history. Therefore, further analysis of this issue will be included in the EIR.

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

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

With regard to cumulative effects for the issues of aesthetics, agricultural resources, biological resources, energy, hazard and hazardous materials, geology and soils, hydrology and water quality, mineral resources, population and housing, schools, parks, libraries, recreation, and utilities, the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts. With regard to aesthetics, pursuant to SB 743, the Project's aesthetic impacts are not considered significant impacts on the environment, and any related projects that may create effects that would not be subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary. The Project would have no impact to agricultural resources, mineral resources, and wildfire and therefore when combined with the incremental effects of other projects, would not result in cumulative impacts.

Thus, similar to the Project, other development occurring in the vicinity of the Project Site would occur on previously disturbed land and would not contribute to a cumulative impact on biological resources. Hydrology and water quality, geology, and utilities are generally site specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these impacts. In addition, with regard to hydrology, the Project would not increase peak flows during the 25-year and 50-year storm events. Thus, the Project would not contribute to cumulative impacts on downstream hydrology infrastructure. With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the residential population and housing generated by the Project would be well within SCAG's growth projections. In addition, the new residential uses would assist in accommodating a critical demand for housing that is currently present within the City of Los Angeles.

Regarding schools, as the Project would pay all applicable developer fees pertaining to Government Code Section 65995, which states that mandatory payment of developer fees to the LAUSD is deemed to provide full and complete mitigation of school facilities impacts, cumulative impacts on schools would be less than significant. Because the Project would pay all applicable developer fees pertaining to recreation and include on-site open space, and related projects with residential uses would as well, the Project would not make a cumulatively considerable impact to parks and recreational facilities. The Project would not make a cumulatively considerable impact upon the City's library system, and cumulative impacts would be less than significant.

Regarding odors, due to the site-specific nature, impacts to other emissions such as those leading to odors are typically assessed on a project-specific basis. The Project would not involve the operation of uses typically associated with strong odors. As such, cumulative impacts would be less than significant. Regarding potential transportation impacts related to a geometric design feature, Project impacts would be less than significant and foreseeable projects would be separately reviewed and approved by the City for compliance with the City's design standards and regulations.

Thus, cumulative impacts for these subject areas would be less than significant, and no further evaluation of these topics in an EIR is required.

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

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