



Angels Landing Project

Case Number: ENV-2018-3273-EIR

Project Location: 361 S. Hill Street (332–358 S. Olive Street, 351–361 S. Hill Street, 417–425 W. 4th Street), Los Angeles, CA 90013

Community Plan Area: Central City

Council District: 14—José Huizar

Project Description: The Project is a new mixed-use development that includes an integrated mix of residential, hospitality, civic, educational, and commercial uses. Specifically, the Project proposes 180 residential for-sale condominium units, 261 residential apartments (including a mix of market rate and affordable units), two hotels with a combined total of 509 guest rooms and food and beverage spaces, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. The Project would also provide private and public open spaces totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area on an approximately 2.24-acre site with a maximum floor area ratio (FAR) of up to 13:1.

The proposed uses would be provided in two towers (referred to as Tower A and Tower B). Tower A would include 64 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built over a seven-level subterranean parking garage up to a depth of approximately 110 feet to 170 feet. The existing Los Angeles County Metropolitan Transportation Authority (Metro) Pershing Square Station portal would be maintained on-site. The Project would require the removal of existing landscaping and the excavation and export of approximately 590,000 cubic yards of soil.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eystone Environmental

APPLICANT:

Angels Landing Partners, LLC

March 2019

INITIAL STUDY

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INITIAL STUDY

1. INTRODUCTION

An application for the proposed Angels Landing Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, 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 evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). 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 (and the forthcoming EIR) are intended as informational documents, which are 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

CEQA 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,

1.2 CONTENT OF AN INITIAL STUDY

This Initial Study has been prepared consistent with the content requirements in State CEQA Guidelines Section 15063(d). This Initial Study include a description of the Project and its location; an identification of the environmental setting for the Project; an identification of the potential environmental effects associated with the Project; a discussion of the ways to mitigate the significant effects of the Project, if applicable; an examination of whether the Project would be consistent with existing zoning and plans, and other applicable land use controls; and the name of the persons who prepared or participated in the preparation of the Initial Study.

1.3 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 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.

1.4 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.4.1 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 determined that the proposed Project may have a significant effect(s) on the environment and 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.

1.4.2 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 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 adequacy of 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 all comments on environmental issues are prepared.

1.4.3 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 effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

2. EXECUTIVE SUMMARY

PROJECT TITLE	ANGELS LANDING PROJECT
ENVIRONMENTAL CASE NO.	ENV-2018-3273-EIR
RELATED CASES	ZA-2018-3271-MCUP-CUX-SPPA-SPP; CPC-2018-3272-DA

PROJECT LOCATION	361 S. HILL STREET (332–358 S. OLIVE STREET, 351–361 S. HILL STREET, AND 417–425 W. 4TH STREET), LOS ANGELES, CA 90013
COMMUNITY PLAN AREA	CENTRAL CITY
GENERAL PLAN DESIGNATION	REGIONAL CENTER COMMERCIAL
ZONING	C2-4D
COUNCIL DISTRICT	14—JOSE HUIZAR

LEAD CITY AGENCY	CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING
STAFF CONTACT	MILENA ZASADZIEN
ADDRESS	221 N. FIGUEROA STREET, SUITE 1350 LOS ANGELES, CA 90012
PHONE NUMBER	(213) 847-3636
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APPLICANT	ANGELS LANDING PARTNERS, LLC. C/O KEVIN ROBERTS, SENIOR VICE PRESIDENT
ADDRESS	448 S. HILL STREET, SUITE 408, LOS ANGELES, CA 90013
PHONE NUMBER	(213) 291-1694

PROJECT DESCRIPTION

The Project is a new mixed-use development that includes an integrated mix of residential, hospitality, civic, educational, and commercial uses. Specifically, the Project proposes 180 residential for-sale condominium units, 261 residential apartments (including a mix of market rate and affordable units),

two hotels with a combined total of 509 guest rooms and food and beverage spaces, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. The Project would also provide private and public open spaces totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area on an approximately 2.24-acre site with a maximum floor area ratio (FAR) of up to 13:1.

The proposed uses would be provided in two towers (referred to as Tower A and Tower B). Tower A would include 64 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built over a seven-level subterranean parking garage up to a depth of 110 feet to 170 feet. The existing Los Angeles County Metropolitan Transportation Authority (Metro) Pershing Square Station portal would be maintained on-site. The Project would require the removal of existing landscaping and the excavation and export of approximately 590,000 cubic yards of soil.

For additional detail, see Section 3, Project Description.

ENVIRONMENTAL SETTING

The Project Site is comprised of an approximately 97,631-square-foot (2.24-acre) site located in the Central City Community Plan area of the City of Los Angeles. The Project Site is generally bounded by the historic Angels Flight funicular railway to the north; Hill Street to the east; 4th Street to the south; and Olive Street and the California Plaza to the west. The Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. The Project Site's location serves to bridge Olive Street and California Plaza with Hill Street, creating a pedestrian linkage between Downtown's Bunker Hill and the Historic Core. Within the vicinity of the Project Site and beyond the bounding streets, to the north of the Project Site is a cluster of iconic cultural arts buildings such as the Museum of Contemporary Arts, the Walt Disney Concert Hall, and the Broad Museum. The Project Site also borders Two California Plaza to the north and west, an active public open space that is part of an open space network between the Downtown skyscrapers. To the east, across Hill Street, are several restaurants and the Grand Central Market. To the south, across 4th Street are two above grade parking structures and the Metro 417 apartment building.

The Project Site has a Regional Center Commercial General Plan land use designation and is zoned C2-4D (Commercial zone, Height District 4 with Development Limitations). Primary regional access is provided by State Route 110 (SR-110) and the Hollywood Freeway (US-101), which are accessible within less than one mile of the Project Site. Major arterials providing regional access to the Project Site include 4th Street, which converges with 3rd Street, and Hill Street, which converges with Martin Luther King Jr. Boulevard.

For additional detail, see Section 3, Project Description.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g., permits, financing approval, or participation agreement)

The City of Los Angeles is the Lead Agency and will carry out and consider approvals for the Project. Other potential agencies that could have discretionary approval power over the Project will be determined during preparation of the Draft Environmental Impact Report.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Notification of the Project was provided to California Native American tribes traditionally and culturally affiliated with the project area on June 12, 2018. None of the tribes contacted requested consultation.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Milena Zasadzien

PRINTED NAME



SIGNATURE

City Planner

TITLE

March 29, 2019

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, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “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 significance.

INITIAL STUDY

3. PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Angels Landing Project (Project) is a new mixed-use development proposed on a 97,631-square-foot (2.24-acre) site located at 332, 350, and 358 South Olive Street/351 and 361 South Hill Street/417 and 425 West 4th Street (Project Site) in the Central City Community Plan area of the City of Los Angeles (City). The Project Site is within the boundaries of the former Community Redevelopment Agency (CRA) Bunker Hill Urban Renewal Project (also known as the Bunker Hill Redevelopment Project). The CRA redevelopment plan identified the Project Site together with the Angels Flight parcel as Bunker Hill Parcel Y1. The City adopted the Bunker Hill Specific Plan in 2013 to refine and replace the regulations of the prior redevelopment plan. The Bunker Hill Specific Plan area generally comprises the same area established by the Bunker Hill Redevelopment Project and the Project Site and Angels Flight parcel are also identified collectively as Parcel Y1 in the Bunker Hill Specific Plan.

The Project is a new mixed-use development that includes an integrated mix of residential, hospitality, civic, educational, and commercial uses. Specifically, the Project proposes 180 residential for-sale condominium units, 261 residential apartments (including a mix of market rate and affordable units), two hotels with a combined total of 509 guest rooms and food and beverage spaces, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. The Project would also provide private and public open spaces totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area on an approximately 2.24-acre site with a maximum floor area ratio (FAR) of up to 13:1.

The proposed uses would be provided in two towers (referred to as Tower A and Tower B). Tower A would include 64 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built over a seven-level subterranean parking garage up to a depth of 110 feet to 170 feet.¹ The existing Los Angeles County Metropolitan Transportation Authority (Metro) Pershing Square Station portal would be maintained on-site. The Project would require the removal of existing landscaping and the excavation and export of approximately 590,000 cubic yards of soil.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 332, 350, and 358 South Olive Street/351 and 361 South Hill Street/417 and 425 West 4th Street within the Central City Community Plan area of the City and within the Bunker Hill Specific Plan area. As shown in Figure 1 on page 10 and in Figure 2 on page 11, the Project Site is

¹ The final depth of excavation may be less than described in this Initial Study.

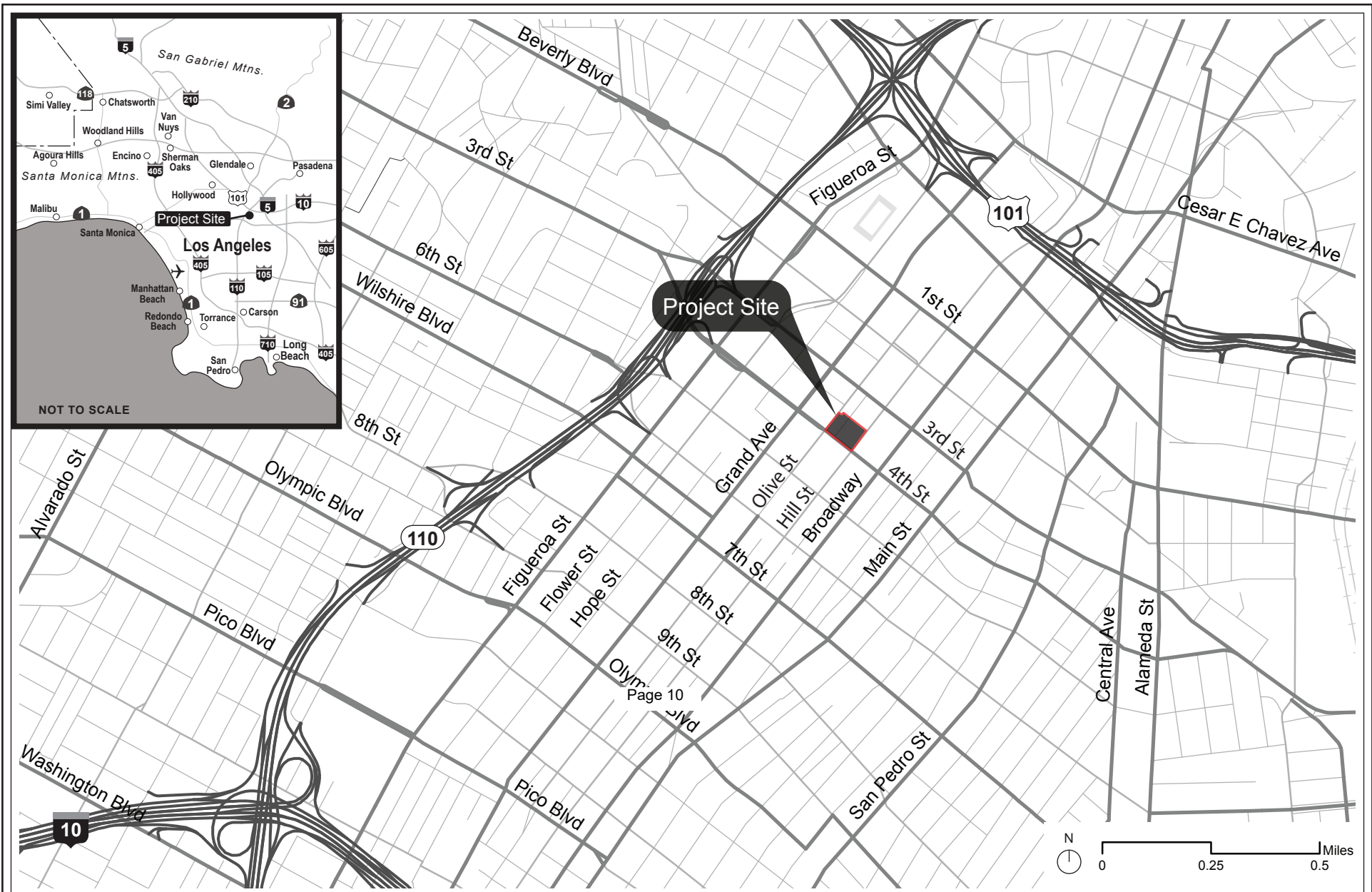


Figure 1
Project Location Map

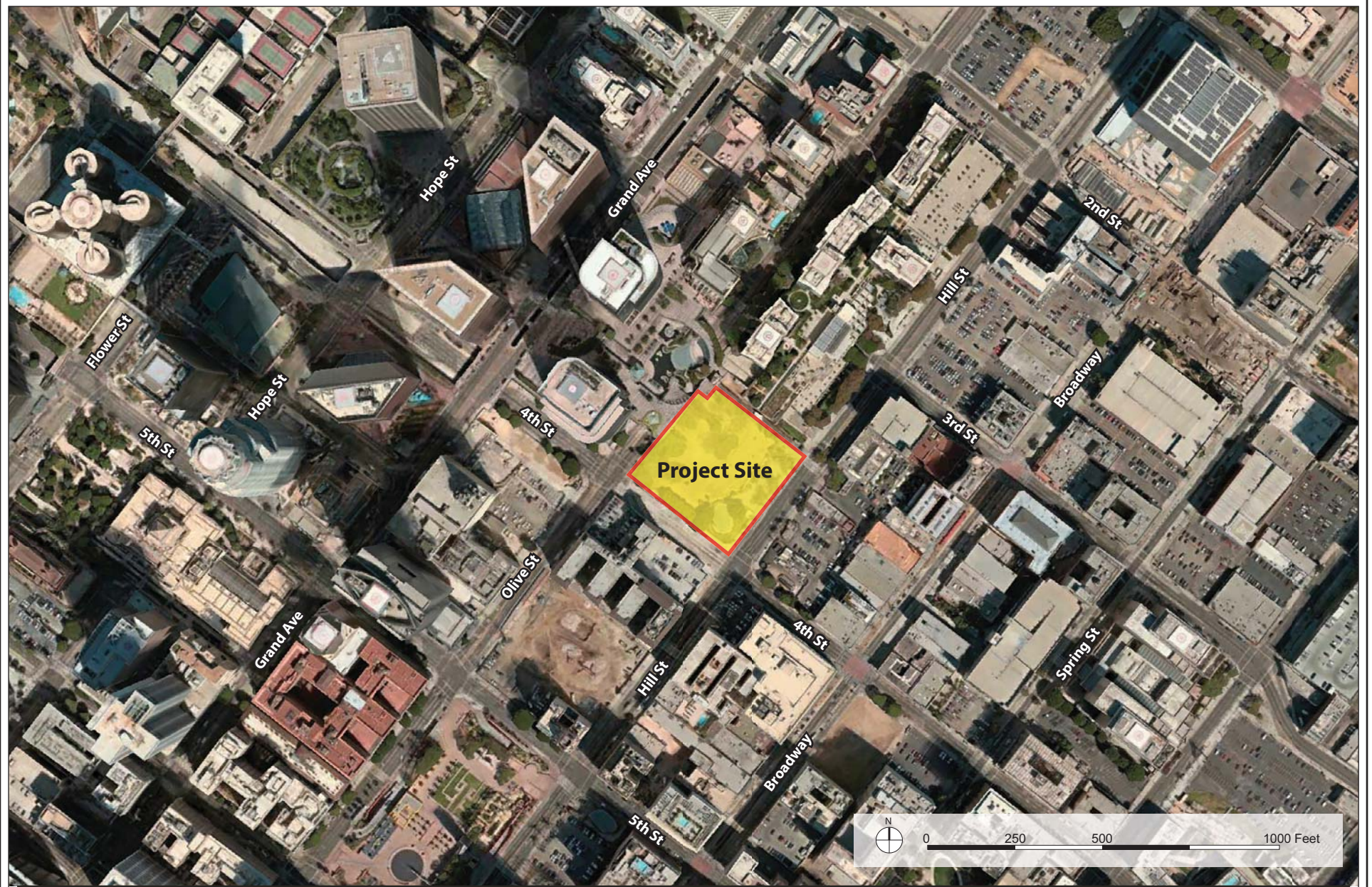


Figure 2
Aerial Photograph of the Project Vicinity

generally bounded by Angels Flight² to the north; Hill Street to the east; 4th Street to the south; and Olive Street and the California Plaza to the west.

3.2.2 Existing Conditions

The Project Site was originally purchased by the City's former Community Redevelopment Agency (CRA) as part of the CRA's Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project. "Bunker Hill" was defined by the CRA as being generally bounded by 1st Street on the north, Hill Street on the east, 5th Street on the south, and the Harbor Freeway (Interstate 110) on the west. Sitting above the Los Angeles County Metropolitan Transit Authority (Metro) Pershing Square Station, the Project Site was originally slated as the third phase of the California Plaza Project. However, the third phase was never actualized, and the Project Site remains undeveloped.

Prior to the dissolution of redevelopment agencies, the Bunker Hill Urban Renewal Project was the oldest active redevelopment project in the City, having been adopted in March 1959, and amended in 1968, 1986, 1990, 1994, 2003, and 2006. To guide development within the Bunker Hill Urban Renewal Project area, the CRA adopted the Design for Development plan in May 1968 (amended in 1971, 2001, and 2008). The Design for Development plan provided urban design principles for proposed development within the Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project area. The Design for Development plan initially established a maximum area-wide floor area ratio (FAR) of 5:1 within the Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project area. At a FAR of 5:1, approximately 19.1 million square feet of total development was allowed in the Bunker Hill Urban Renewal Project/Bunker Hill Redevelopment Project area. An amendment to the Design for Development to allow an increase in the FAR to 6:1 was proposed in 2008 and an Environmental Impact Report (EIR), referred to as the Bunker Hill Amended Design for Development EIR, was prepared to evaluate the potential environmental impacts of the proposed amendment. The proposed Amended Design for Development, which was adopted by CRA in 2008, allowed for an additional 3.9 million square feet to be built in Bunker Hill, and it specifically earmarked approximately 362,000 square feet of floor area to increase the potential development capacity of the Y1 Parcel - the Project Site and the adjacent Angels Flight parcel - to approximately 1.3 million total square feet.

The City adopted the Bunker Hill Specific Plan in 2013 to refine and replace the regulations of the prior redevelopment plan. The Bunker Hill Specific Plan is one of the primary land use documents that regulates development rights on the Project Site. The Bunker Hill Specific Plan, and the Central City Community Plan, encourage mixed-use districts with expanded housing opportunities and commercial retail uses that can create a 24-hour downtown environment. The Bunker Hill Specific Plan encourages infill development that enlivens the street and public spaces. It encourages a mix of land uses that support high levels of transit use and additional employment opportunities. The Bunker Hill Specific Plan controls the types of uses and permitted development densities within its boundary. Pursuant to the Bunker Hill Specific Plan, previous development capacities allotted in the former Bunker Hill Redevelopment Project remained in effect. The resulting floor area rights as of the expiration date of the

² Angels Flight is an historic funicular railway originally constructed in 1901 with tracks connecting Hill Street and Olive Street. Operations ceased in 1969, yet after being stored for 27 years, the funicular was rebuilt and reopened in 1996, half a block south of the original site. The tracks are along the northern edge of the Project Site and connect Hill Street and California Plaza. Angels Flight is 298 feet long on an approximately 33 percent grade.

former Bunker Hill Redevelopment Plan are included in Appendix A of the Bunker Hill Specific Plan. In other words, the floor area rights for the parcels identified in Appendix A of the Bunker Hill Specific Plan are the allowable development square footage rights for each parcel. Appendix A of the Bunker Hill Specific Plan identifies the remaining floor area rights of the Y1 Parcel, including the Project Site and Angels Flight, as 1,390,900 square feet, which translates to an approximate FAR of 13:1.

In addition, it should be noted that the City recently processed a lot line adjustment to divide the Y1 Parcel into two parcels in order to separate the Project Site from the adjacent Angels Flight property. This action resulted in approximately 1,269,150 square feet of remaining floor area allocated to the Project Site for development rights. The Project would be designed to comply with this development envelope.

The CRA/LA, a Designated Local Authority and successor to the CRA, is the current owner of the Project Site. The City has entered into an option agreement to purchase the Project Site from the CRA/LA for the purpose of selling the Project Site to Angels Landing Partners, LLC (Applicant) for the development of the Project as described. As shown in Figure 2 on page 11, the Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site.

The Project Site is located within the Central City Community Plan area.³ The Project Site has a Regional Center Commercial General Plan land use designation and is zoned C2-4D (Commercial zone, Height District 4 with Development Limitations). The Project Site is also within the Bunker Hill Specific Plan area and within a Transit Priority Area, the Greater Downtown Housing Incentive Area, and the former Los Angeles State Enterprise Zone, as identified by the City.⁴ The C2-4D zoning of the Project Site does not limit building height. The Bunker Hill Specific Plan,⁵ in conjunction with the Project Site's C2-4D zoning, permits a mix of residential, educational, and commercial uses.

3.2.3 Surrounding Land Uses

The grade difference of the Project Site in particular presents a unique setting relative to the surrounding land uses. The Project Site sits on the southern edge of the Bunker Hill neighborhood, bordered to the south by 4th Street and to the east and west by Hill Street and Olive Street, respectively. The Project Site's location serves to bridge Olive Street and California Plaza with Hill Street, creating a pedestrian linkage between Bunker Hill and Downtown's Historic Core. The historic Angels Flight is adjacent to the northern border of the Project Site.

Beyond the bounding streets, to the north of the Project Site is a cluster of iconic cultural arts buildings such as the Museum of Contemporary Arts, the Walt Disney Concert Hall, and the Broad Museum. The Project Site also borders Two California Plaza to the north and west, an active public open space that is

³ The City is currently in the process of updating the Central City Community Plan.

⁴ Legislative action resulted in the repeal of the Enterprise Zone Act and the dissolution of Enterprise Zones, effective December 31, 2013. However, the parking reduction provisions of the Enterprise Zone are still effective. (Source: www.hcd.ca.gov/grants-funding/archive/enterprise-zone.shtml.)

⁵ As set forth in Section 3 of the Specific Plan, the regulations of the Specific Plan are in addition to those set forth in the Los Angeles Municipal Code (LAMC). Wherever the Specific Plan contains provisions which establish regulations that are different from, more restrictive or more permissive than would be allowed pursuant to the provisions in the LAMC, the Specific Plan shall prevail and supersede the applicable provisions of the LAMC.

part of an open space network between the Downtown skyscrapers. To the east, across Hill Street, are several restaurants and the Grand Central Market. To the south, across 4th Street are two above grade parking structures and the Metro 417 apartment building. The uses surrounding the Project Site are primarily designated for Regional Center Commercial land uses and zoned C2-4D or R5-4D.

As shown in Figure 1 on page 10, primary regional access is provided by State Route 110 (SR-110) and the Hollywood Freeway (US-101), which are accessible within less than one mile of the Project Site. Major arterials providing regional access to the Project Site include 4th Street, which converges with 3rd Street, and Hill Street, which converges with Martin Luther King Jr. Boulevard. Public transit service in the vicinity of the Project Site includes Metro's subway Red Line and numerous local and regional bus lines, which provide connections to other Downtown subway stations. In particular, Metro's Pershing Square Station, which is located on the southeastern corner of the Project Site, provides connections to Metro's Red Line and Purple Line. There is also a bus stop along Hill Street, across from the Project Site, which serves Metro Bus Lines 2/302, 4, 10/48, 81, 90/91, and 94 and the Los Angeles Department of Transportation (LADOT)'s Commuter Express 419. An additional bus stop along Hill Street, near 3rd Street, serves Metro Bus Lines 2/302, 4, 10/48, and 794. In addition, Angels Flight, an historic funicular railway, provides a connection between Hill Street and Olive Street.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized in Table 1 on page 15, the Project proposes to develop 180 residential for-sale condominium units, 261 residential apartments (including a mix of market rate and affordable units), two hotels with a combined total of 509 guest rooms and food and beverage spaces, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space.

The Project would result in up to 1,269,150 square feet of floor area with a maximum FAR of up to 13:1. The proposed uses would be distributed throughout a series of terraced levels and in two towers (Tower A and Tower B) that would be constructed above a subterranean parking garage. The proposed parking garage would include 750 parking spaces in up to seven subterranean levels. The Project would also provide a variety of open space areas totaling 56,881 square feet.

3.3.2 Design and Architecture

Key elements of the design of the Project include the re-interpretation of the arrival plaza at Metro's Pershing Square Station, enhancing the experience of the Angels Flight funicular, creating an active pedestrian environment along the street frontages, and providing functional pedestrian connections to and from California Plaza and its adjacent office buildings and streets. To this end, the Project's design consists of a series of cantilevered floors and landscaped terraced levels that gradually transition from the lowest point of the Project Site at Hill Street and 4th Street up to California Plaza, as shown in the conceptual site and level plans provided in Figure 3 through Figure 10 on pages 16 through 23. Along the path of these terraced levels are active uses and amenities with multiple circulation routes. The terraced levels would sit atop a subterranean parking garage.

The proposed uses would be distributed throughout the terraced levels and in Tower A and Tower B. Tower A would include 64 floors with a building height of up 854 feet. Tower B would include 42 floors

**Table 1
Summary of Proposed Floor Area^a**

Land Use	Proposed Development
Residential—Condominiums	436,195 sf (180 units)
Residential—Apartments	333,910 sf (261 units)
Hotel	423,553 sf (509 rooms)
Educational/Cultural/Civic	38,977 sf
Commercial (retail/restaurant)	36,551 sf
Total	1,269,150 sf
<hr/> <i>rm = rooms</i> <i>sf = square feet</i> ^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> <i>Source: Handel Architects, LLP., 2019.</i>	

with a building height of up to 494 feet. The different heights of the towers have been intentionally designed and placed adjacent to each other to create the sense of a “gateway” into the Project Site and a transition between the high-rise buildings atop Bunker Hill to the west and the City’s Historic Core to the east. In particular, the lower tower (Tower B), which is located along 4th Street and set back from the corner of Hill Street, is transitional, designed to be in-between the scale of the lower neighboring buildings across 4th Street and the taller scale of the planned new development across Hill Street. The taller tower (Tower A) is located on the north side of the Project Site and is located closer to the street edge.

The first terraced level includes parking, retail and restaurant uses. The Project also proposes to improve the experience and space (at grade level) for the Metro Pershing Square Station with a café and newly-designed canopy above the existing station access stairs and escalators. These uses would be integrated with the proposed Hill Street Plaza located at the corner of the Project Site, which would include landscaping and seating areas. From the Metro Pershing Square Station and Hill Street Plaza, there would be steps and terraces up approximately one story to the lower porte cochère level. As illustrated in Figure 5 on page 18, the lower porte cochère level would provide access to residential and hotel lobbies and restaurant uses within Tower A and would include retail and restaurant uses along 4th Street.

As shown in Figure 6 on page 19, the upper porte cochère level above the lower porte cochère level would include hotel meeting rooms, a conference lobby, pre-function space, and a ballroom associated with the proposed hotel within Tower A, as well as a hotel lobby, hotel bar/lounge, and apartment lobby

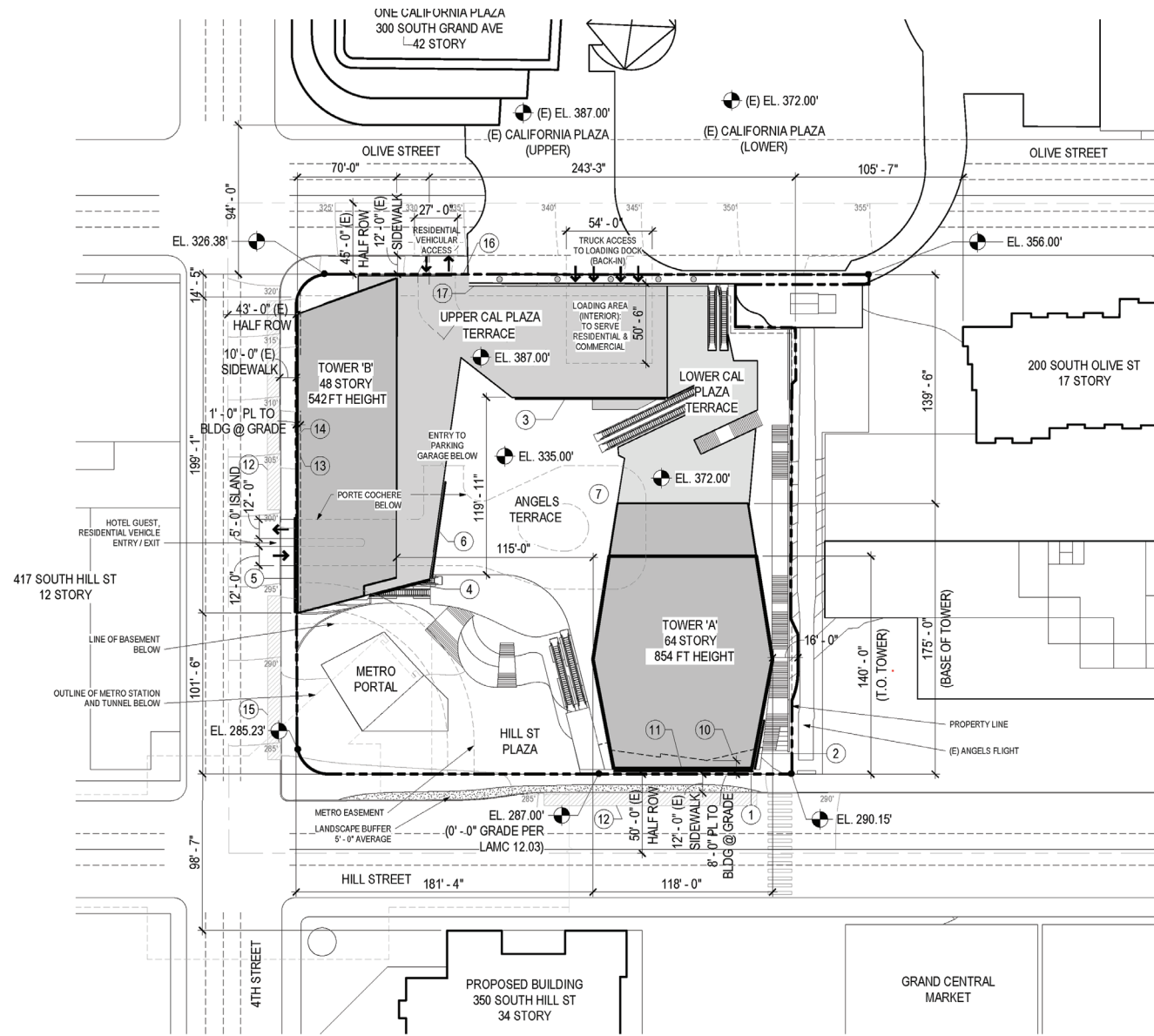


Figure 3
Conceptual Site Plan

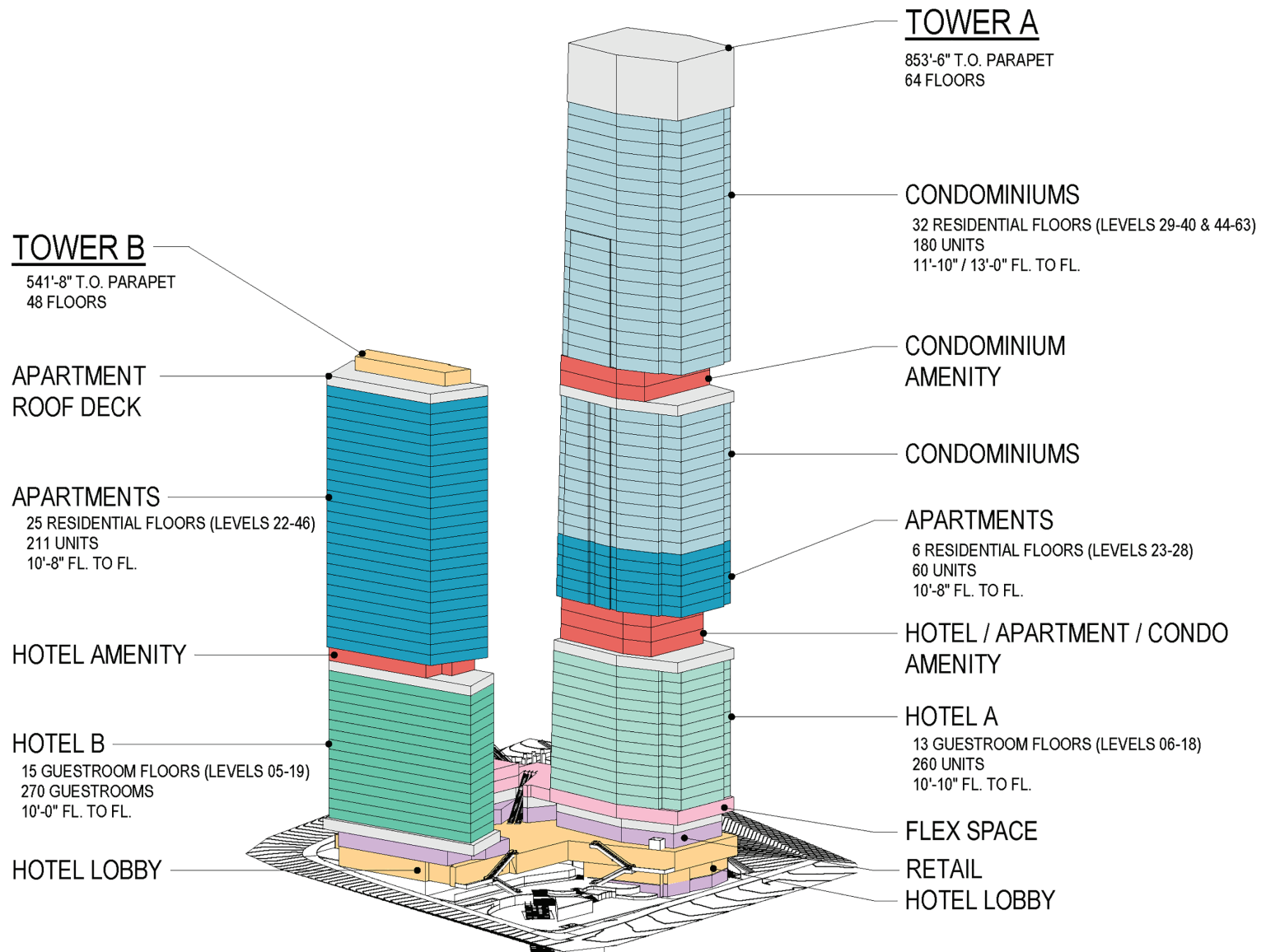


Figure 4
Conceptual Project Overview

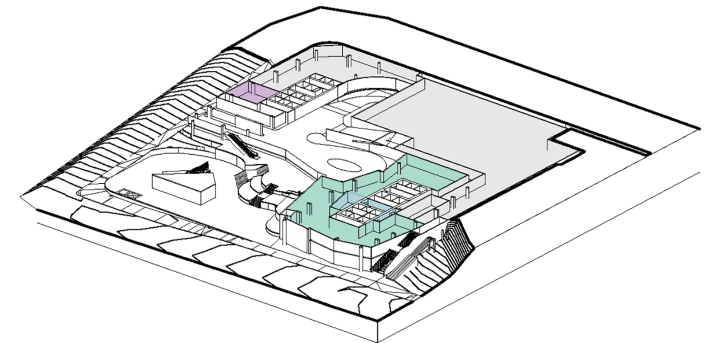
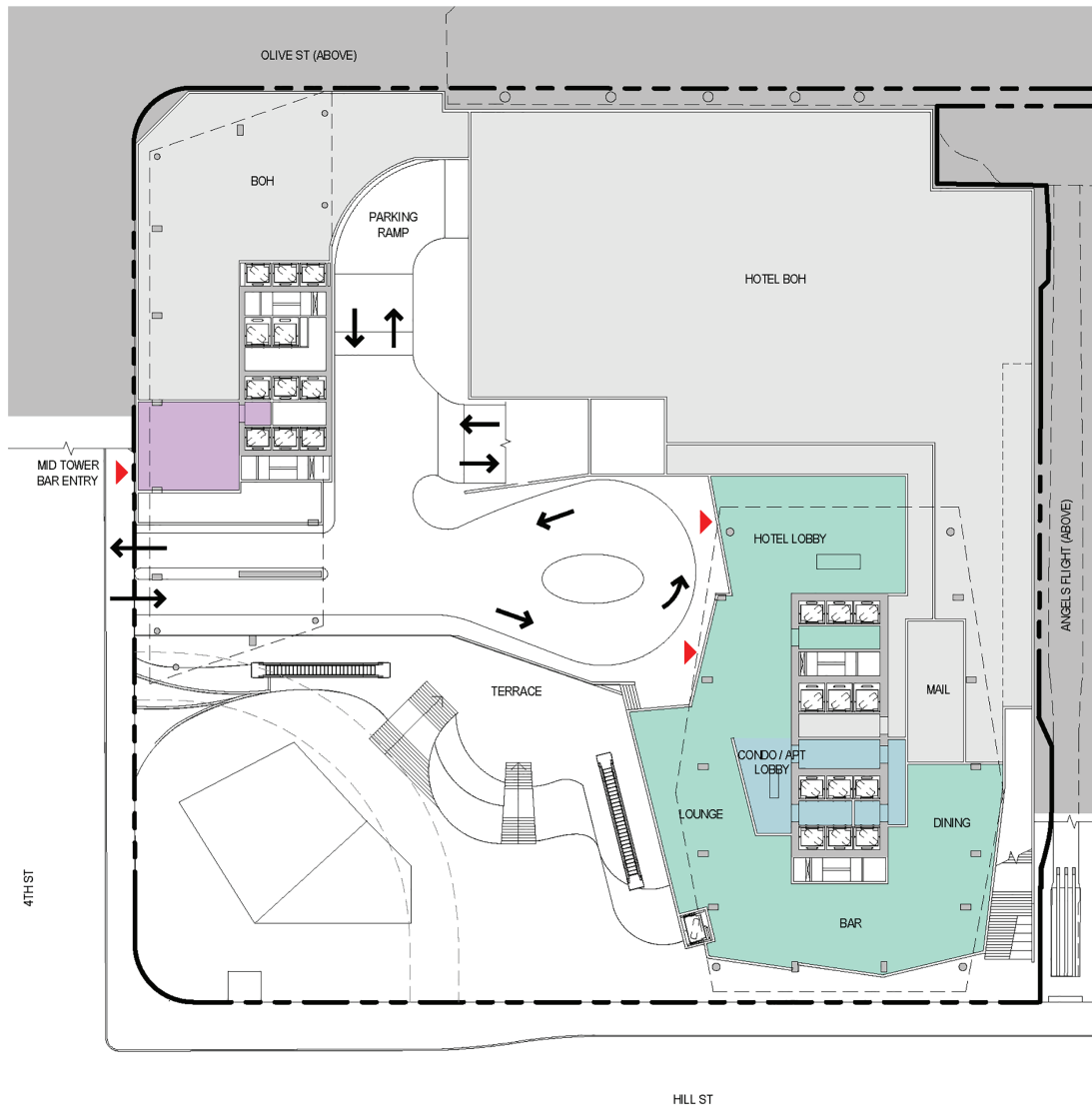


Figure 5
 Conceptual Site Plan—Lower Porte Cochère Level

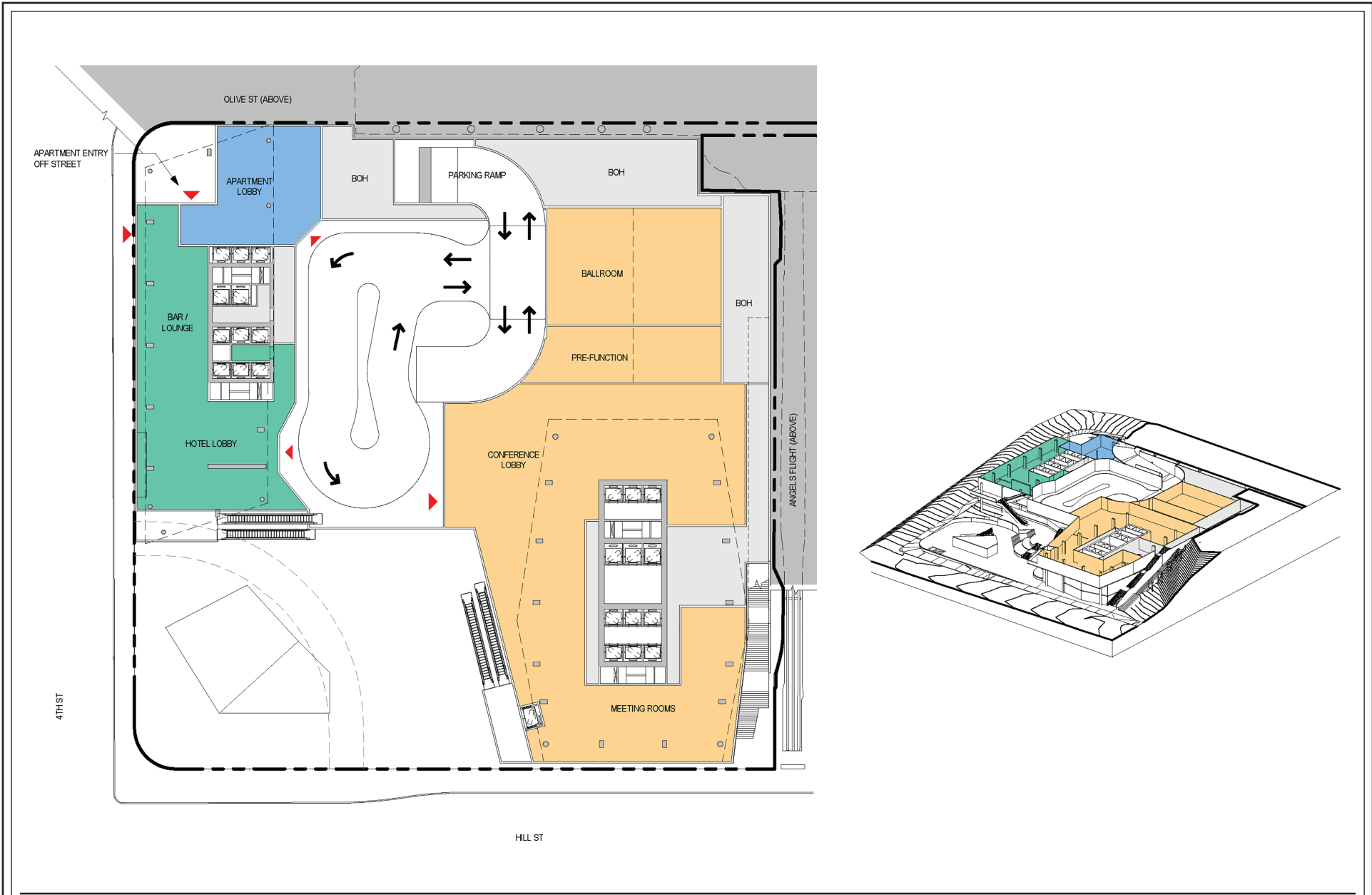


Figure 6
 Conceptual Site Plan—Upper Porte Cochère Level

Source: Angels Landing Partners, Handel Architects LLP, 2018.



Figure 7
 Conceptual Site Plan—Angels Terrace Level

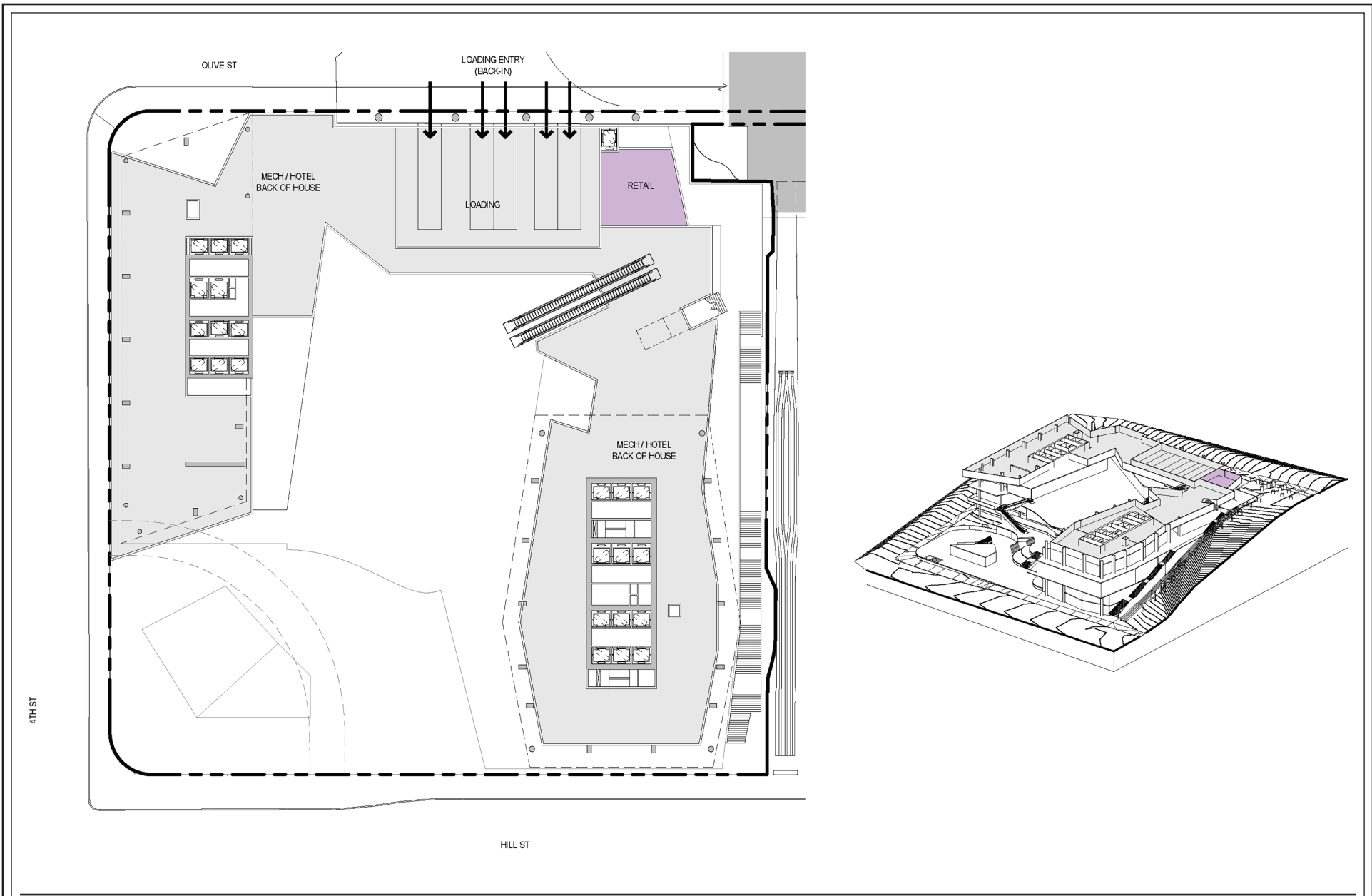


Figure 8
 Conceptual Site Plan—Service/Loading Level

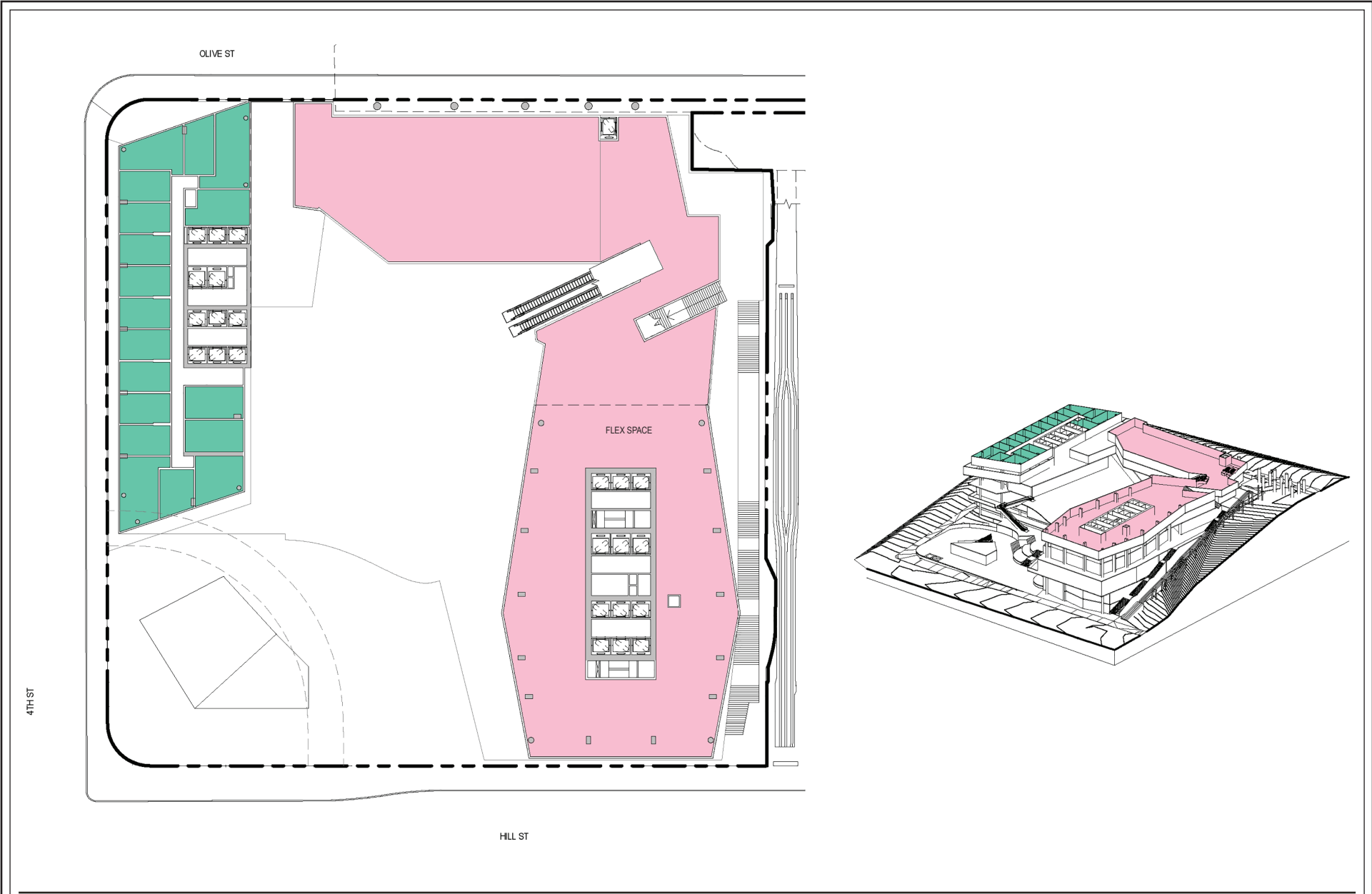


Figure 9
Conceptual Site Plan—Flex Space

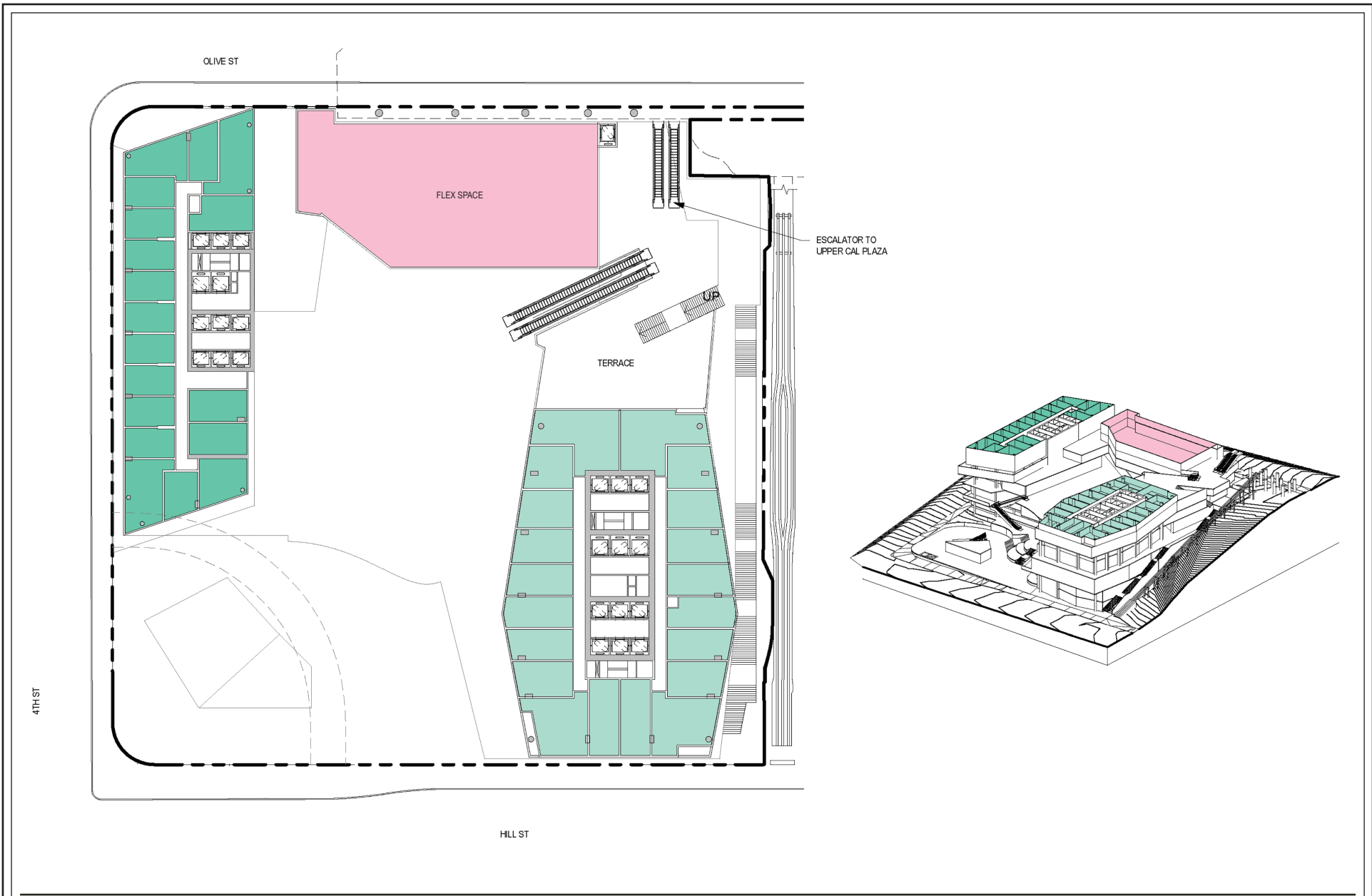


Figure 10
 Conceptual Site Plan—Lower California Plaza

within Tower B. From the upper porte cochère level would be escalators and elevators to the Angels Terrace level. Angels Terrace is a proposed landscaped and open space area intentionally designed and located in the center of the Project Site, between the two towers, as the primary publicly accessible open space of the Project. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Angels Terrace would also provide access to multiple other uses surrounding the Project Site, including Angels Flight via a paseo linking the corner of 4th Street and Olive Street with the steps of Angels Flight and escalators and an elevator up to California Plaza. As provided in Figure 7 on page 20, the Angels Terrace level would include a variety of retail and restaurant spaces surrounding Angels Terrace. Level 4 above the Angels Terrace level would be comprised primarily of service and loading areas and would include a small retail space along Olive Street, as illustrated in Figure 8 on page 21.

As shown in Figure 9 on page 22, Level 5 would include the majority of the proposed 38,977 square feet of educational/cultural/civic uses. The level above would consist of the additional educational/cultural/civic area as well as hotel, residential units, and amenities in Tower A and Tower B, as illustrated in Figure 10 on page 23. Access to Angels Flight and to the California Plaza would also be available from this level.

As depicted in Figure 5 on page 18 through Figure 10 on page 23, Tower A and Tower B would share part of the podium that includes the proposed residential lobby, hotel lobbies, hotel meeting and event spaces, the educational/cultural/civic space, a portion of the commercial space, and service areas. Above the podium and these uses, Tower A would include a 260-room hotel, 60 residential apartments (consisting of studio, one-, two- and three-bedroom units), 180 condominium units (consisting of one-, two- and three-bedroom units as well as penthouses), and hotel and residential amenities. Tower B would include a 249-room hotel, 201 residential apartments, and hotel and residential amenities. Each hotel would have its own lobby, retail and restaurant uses, and back-of-house and loading areas and would share loading areas and access to the terraces and open spaces. The apartments, condominiums, and hotel within Tower A would also share amenities and a pool deck. The apartment and condominium uses and hotel uses would each have their own lobby with elevators serving their respective use and the shared amenities and parking.

The architecture of the towers includes a series of exterior wall designs with each wall design correlating to the program of the building's interior. For example, the first wall expression occurs at the base of the two towers where a horizontal balcony feature wraps around the floor plates to create strong shadows along the exterior. The second wall expression is predominantly present in Tower A and consists of a vertical design expression that utilizes floor to ceiling glass and protruding vertical fins that appear to be seen as layered screens in front of a horizontal substructure to expose balconies at the corners of the floor plates. The building materials that are intended for the exterior of the Project would consist of various types of glass panels, metal balustrades and screening elements, and plaster, and at the podium level, additional materials such as stone and terra cotta. The palette and color scheme for the Project consist of light and warm tones.

As noted above, key components to the design of the Project include the integration of the existing Metro Pershing Square Station and the adjacent historic Angels Flight funicular. The Project includes the demolition of the existing station canopy and the above grade walls of the station portal to allow for the construction of a new structure adjacent to the station, which is proposed to include a café as part of the proposed Hill Street Plaza. The proposed new structure would include a roof extending over the station

escalators and stairs to remain and glass skylights to allow light down into the station. The Project's design also emphasizes a respectful relationship to Angels Flight. Specifically, Tower A is intentionally placed on Hill Street, near the Angels Flight portal, much like the historic buildings that were the Angels Flight's immediate neighbors in the past. Tower A would also be set back approximately 10 feet from the shared property line with Angels Flight to showcase the track. The existing stairs along Angels Flight would be replaced with a new, enhanced and landscaped version of the stair that connects Hill Street to Olive Street and California Plaza, preserving the close-up experience of Angels Flight that exists today. In addition, Tower A would not be at full height for the full length of Angels Flight. For the upper portion of the track, Tower A would step down to approximately eight stories. The northwest end of Tower A would be set back approximately 50 feet from California Plaza, providing space and relief for the upper station of Angels Flight, and allowing views for riders at the top toward the Project's open space and the City beyond, and to allow reciprocating views from the Project's open space back to the upper station. Along the track at most floors, Tower A would feature windows facing Angels Flight, as it had earlier in its history. Residential lobbies located one level above Hill Street would provide views directly over the lower portal. Up one level at the upper porte cochère would be meeting spaces toward the Hill Street side that would also provide views of Angels Flight. Toward the top, hotel rooms with balconies would face the track, restoring the intimate personal relationship between building occupants and riders historically had with one another. Located about mid-way up the track, a double height lobby and lounge would have a full height window wall facing Angels Flight. At the street level, the retail storefronts and restaurants would be set back from the Hill Street sidewalk near the lower portal. This would open up views to the portal for those walking along Hill Street and would provide a queuing area at the lower station.

3.3.3 Open Space and Landscaping

The Project would incorporate common and private open space and recreational amenities within the Project Site. The Project would provide common open space that would be generally publicly accessible during daytime hours in the form of plazas (the Hill Street Plaza and Angels Terrace), gardens, courtyards, and landscaped terraces. The common open space proposed to be provided within the Project Site would include 56,881 square feet of exterior common area and additional interior common area, which would exceed the requirements of the LAMC. Open spaces would be ADA accessible, with clear site lines. Direct connections would be provided throughout the Project Site to each new open space as well as to the improved and widened Angels Flight stairs via an overlook landing. Additionally, direct connections would be made to California Plaza on the northwest end of the Project Site in the form of a large, connected, landscaped terrace that would be located adjacent to the primary flex space area. Open spaces would include gardens, fixed and moveable seating, canopy trees for shade, and durable paving materials. Plant species utilized in the Project would consist of both native and adapted plants.

The primary open space amenity would be a flexible open space area (referred to as Angels Terrace) that would be located at the center of the Project Site. Angels Terrace would provide shade and seating to host a wide range of cultural events and performances. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges and meeting rooms. Additional common and private open space areas are provided throughout the Project Site. Trees and other landscaping elements would also be provided along the streets surrounding the Project Site.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via two access points, including one at Olive Street and another at 4th Street. The Olive Street access would be the primary site access for users of the parking garage and would include a direct ramp down to the parking levels. The 4th Street access would provide access to the lower porte cochère. In addition to entrances to the hotel lobbies, the porte cochère would provide access to the apartment and condominium lobbies. All parking via the porte cochère would be valet, and the porte cochère includes a separate ramp to the parking garage. Service deliveries would occur via Olive Street where the loading dock would be located beneath the California Plaza overbuild. Access for trash pickup would be provided adjacent to the loading dock via Olive Street.

Pedestrian access would be enhanced along the perimeter and throughout the Project Site and would be provided via new pedestrian walkways from 4th Street, Olive Street, and Hill Street. In addition, as previously discussed, the landscaped terraces of the podium would feature stairs, escalators, and elevators that would connect the levels and surrounding streets. A pedestrian paseo (referred to herein as the North Paseo) proposed at 4th Street and Olive Street would be a key pedestrian access point to the Project Site. The North Paseo would extend from the corner of 4th Street and Olive Street to a new staircase next to Angels Flight. Overall, pedestrian access to the Project Site would be provided via steps along Angels Flight, connecting Hill Street to Olive Street and California Plaza, the North Paseo, and the various terraced levels connecting the Project to the surrounding uses and streets.

As previously described, the proposed parking garage would include 750 parking spaces in up to seven subterranean levels. For impact analysis purposes, below grade parking would extend to a maximum depth of 110 feet to 170 feet. The built condition may include fewer subterranean levels.

In accordance with LAMC requirements, unless superseded by the Bunker Hill Specific Plan, the Project would provide 366 bicycle parking spaces, including 100 short-term spaces and 266 long-term spaces.

3.3.5 Lighting and Signage

Proposed lighting would include shielded exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, shielded lighting to accent signage, architectural features, exterior artwork or murals, and landscaping elements would be incorporated throughout the Project Site. Exterior lights, including lights on the rooftop of Tower B, would be directed onto the Project Site and designed to minimize light trespass from the Project Site. Characteristic of a Downtown area, the tallest tower, Tower A, would include a rooftop light feature as an architectural element to highlight the Project Site. New sources of artificial lighting that would be introduced by the Project would also include interior lighting and automobile headlights. Project signage would include a central identify sign and various general wayfinding and retail signs typically associated with a mixed-use project similar to the Project. The identity sign would be located on Hill Street Plaza and would consist of a building-mounted sign with lettering presenting the Project name and/or address. The Project would have identity signs located on the buildings (either at the top of the tower(s) or mid-building according to hotel branding standards). Typical of an urban mixed-use center, the Project would include retail signage primarily orienting towards Hill Street and 4th Street. Due to the continuous changing nature of retail, retail signage could change over time. Other vertical building-mounted signage would be located along Olive Street and 4th Street to indicate the main residential, guest, and commercial parking entrances. Awning signs and projecting signs would be used to identify the residential lobby entrances and retail

locations at a pedestrian scale. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and residential corridors. Project signage may also include murals on building walls intended to complement the design of the structures and enliven the pedestrian experience while respecting the urban context and surrounding uses. In general, new signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the proposed uses.

3.3.6 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design.

3.3.7 Anticipated Construction Schedule

Construction of the Project would commence with the clearing of the existing landscaping on the Project Site. This would be followed by grading and excavation for the subterranean parking. The Project would require excavation up to 110 feet to 170 feet below the ground surface. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to be completed in 2028. It is estimated that approximately 590,000 cubic yards of export material would be hauled from the Project Site during the excavation phase.

3.4 REQUESTED PERMITS AND APPROVALS

The preliminary list below includes the anticipated entitlements for the Project. This list is for the Initial Study stage of analysis and is subject to change during preparation of the Draft Environmental Impact Report for the Project. The Draft Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements, permits, approvals, and public agency actions associated with the Project. The discretionary entitlements, permits, and approvals for the Project include, but are not necessarily limited to, the following:

- Master Conditional Use Permit for Alcohol;
- Conditional Use Permit for Live Entertainment and Dancing;
- Director’s Determination for Alternative Design;
- Project Permit Compliance;
- Vesting Tentative Tract Map;
- Haul Route Approval;
- Development Agreement; and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

INITIAL STUDY

4. ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new 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 adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” 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.”⁶

PRC Section 21099 applies to the Project. Specifically, as described in Section 3, Project Description, of this Initial Study, the Project is a new mixed-use development that would include residential, hospitality, civic, and commercial uses. As such, pursuant to Senate Bill 743, the Project is considered a mixed-use residential project. Pursuant to Public Resources Code Section 21099, the Project is also considered an employment center project because it is located on property that is zoned for commercial uses and would include development of two proposed hotels and other commercial uses with a floor area ratio (FAR) no less than 0.75 and that is located within a transit priority area. Specifically, the Bunker Hill Specific Plan,⁷

⁶ 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, <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

⁷ As set forth in Section 3 of the Bunker Hill Specific Plan, the regulations of the Specific Plan are in addition to those set forth in the LAMC. Wherever the Specific Plan contains provisions which establish regulations which are different from, more
(Footnote continued on next page)

in conjunction with the Project Site's C2-4D zoning (Commercial zone, Height District 4 with Development Limitation), permits a mix of residential, educational, and commercial uses. The maximum FAR for the Project Site is limited to approximately 13:1. In addition, the Project Site is located on an infill site as defined by Public Resources Code Section 21099. Specifically, the Project Site is a lot located within an urban area that has been previously developed. Also pursuant to Public Resources Code Section 21099, the Project Site is within a transit priority area as the southeastern corner of the Project Site contains an existing rail transit station (the Los Angeles County Metropolitan Transportation Authority (Metro) Pershing Square Station for Metro's subway Red Line, which qualifies as a major transit stop. Therefore, the Project Site is located in a transit priority area as defined in Public Resources Code Section 21099. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in the City's Zoning Information File ZI No. 2452.8. Therefore, the Project is exempt from aesthetic impacts.

The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

restrictive or more permissive than would be allowed pursuant to the provisions in the LAMC, the Specific Plan shall prevail and supersede the applicable provisions of the LAMC.

⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 11, 2018.

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

No Impact. A scenic vista is a publicly available panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As shown in the site photographs included in Figure 11 and Figure 12 on pages 32 and 33, due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. The Project Site is currently vacant and unmaintained land and public access is not allowed. There are no resulting views from the Project Site. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since there are no publicly available views from the Project Site and no vistas currently exist. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located along a City-designated or State scenic highway.^{9,10} Therefore, the Project would not substantially damage scenic resources within a State or City-designated scenic highway. Moreover, pursuant to Senate Bill 743 and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

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?

No Impact. The Project Site is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project Site has a Regional Center Commercial General Plan land use designation and is zoned C2-4D (Commercial zone that does not limit height) The Bunker Hill Specific Plan, in conjunction with the Project Site's C2-4D zoning, permits a mix of residential, educational, and commercial uses on the Project Site. As such, the proposed residential, hotel, civic, and commercial uses would be consistent with the

⁹ City of Los Angeles General Plan, Transportation Element, Map E: Scenic Highways in the City of Los Angeles.

¹⁰ California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed July 30, 2018.



View southwest from Hill Street



View northwest from Hill Street



View north from Hill Street



View north from the corner of Hill Street and 4th Street

Figure 11
Existing Site Photographs



View east from 4th Street



View northeast from corner of 4th Street and Olive



View southeast from Cal Plaza

Figure 12
Existing Site Photographs

types of uses anticipated for the Project Site's C2-4D zone. In addition, the proposed height and scale of the towers would be consistent with the height and visual qualities of surrounding buildings.

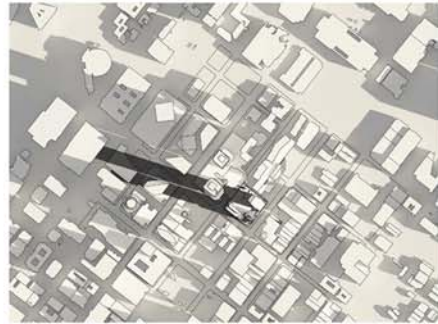
The Bunker Hill Specific Plan also contains urban design regulations that work in concert with the provisions of the Downtown Design Guide, which both apply to the Project Site. The Bunker Hill Specific Plan sets forth design issues such as ground floor retail, sidewalk treatments, ground floor plazas, and use of open space. Similarly, the Downtown Design Guide contains detailed design elements for creating a livable downtown, and focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. The Project, as currently designed, contains ground floor retail, activates the sidewalks, is integrated with the existing Metro Pershing Square station, and contains ground floor pedestrian plazas and open space. Thus, there is consistency with zoning and other regulations governing scenic quality. In addition, the Project will undergo design review with the City's Urban Design Studio and incorporate elements that are consistent with the applicable requirements of the Bunker Hill Specific Plan and Downtown Design Review.

Therefore, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

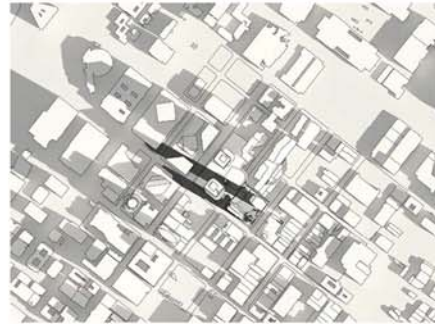
Shading

Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. The standard of significance for shading is if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November). The surrounding uses in the general vicinity of the Project Site include residential and commercial uses and outdoor seating and plazas. The surrounding residential developments could contain routinely useable outdoor spaces, such as outdoor patios, roof decks with pools, etc. As shown in the shadow diagrams provided in Figure 13 through Figure 16 on pages 35 through 38, Project shadows would move generally northwest to east across the surrounding landscape.

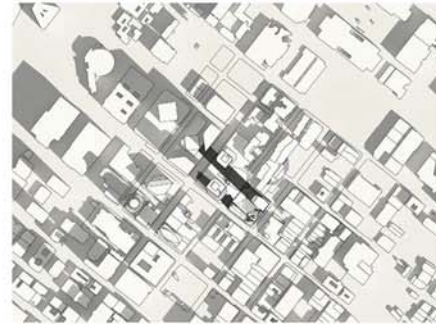
As shown in Figure 13 on page 35, during the spring equinox at 9:00 A.M., Project shadows would extend west across the urban landscape and would shade portions of the adjacent California Plaza towers as well as other buildings along the south side of 4th Street, including the Downtown YMCA and the CBRE Building. By 10:00 A.M., shadows would begin to move north off these uses and would primarily extend across 4th Street and across portions of buildings on the north side of 4th Street, including the California Plaza towers, the Bank of America courtyard, and The Court Wells Fargo Center. By 11:00 A.M., Project shadows would primarily extend across the California Plaza towers and shading only a portion of The Court Wells Fargo Center. This shading pattern would continue through 1:00 P.M. with Project shadows primarily extending across a portion of the California Plaza towers and shading only small portions of the nearby Museum of Contemporary Art and the Omni Los Angeles hotel. By 2:00 P.M., Project shadows would extend mostly north, shading a very small portion of the California Plaza and portions of the Angelus Plaza buildings. By 3:00 P.M., Project shadows would extend off the California Plaza and begin



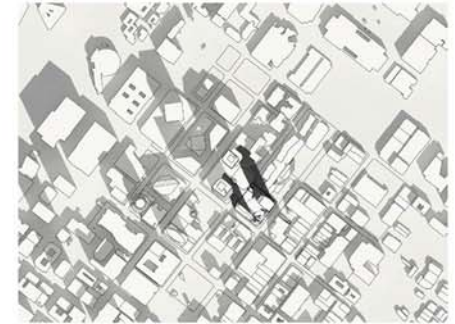
9:00 AM



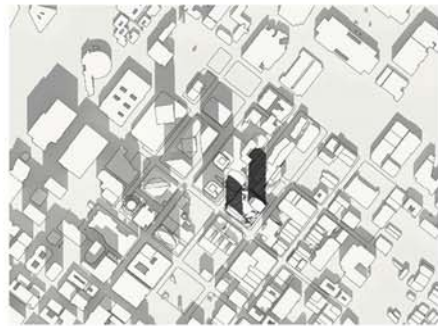
10:00 AM



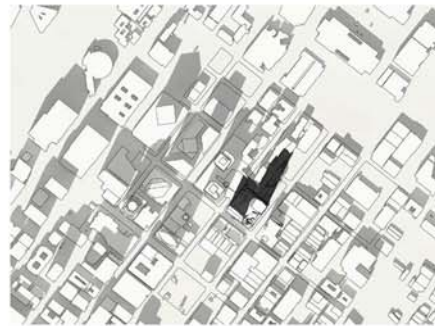
11:00 AM



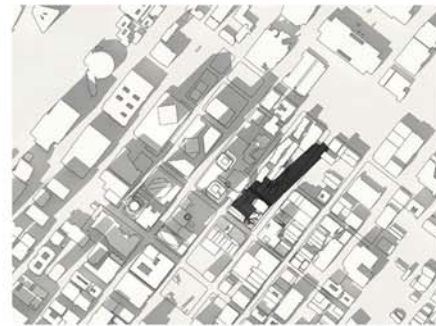
12:00 PM



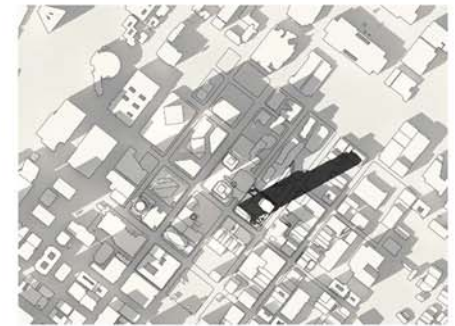
1:00 PM



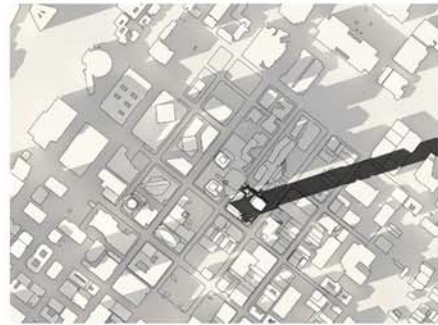
2:00 PM



3:00 PM

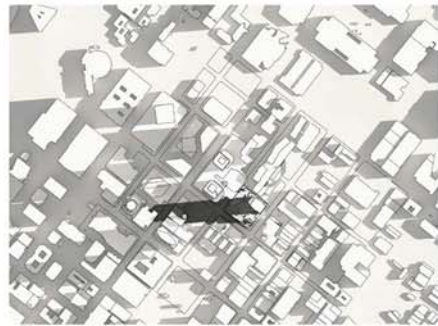


4:00 PM

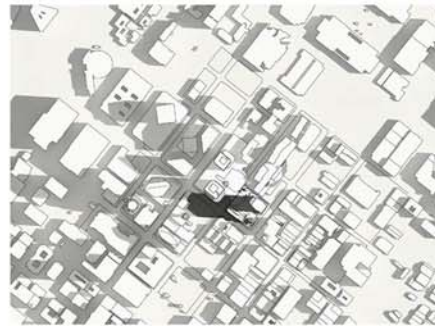


5:00 PM

Figure 13
Project Shadows—Spring



9:00 AM



10:00 AM



11:00 AM



12:00 PM



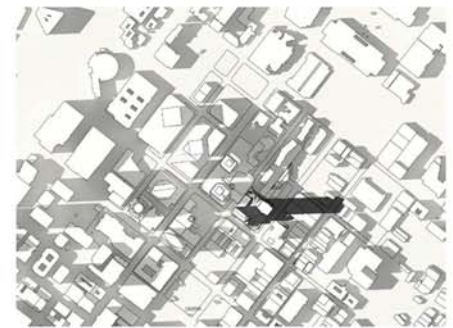
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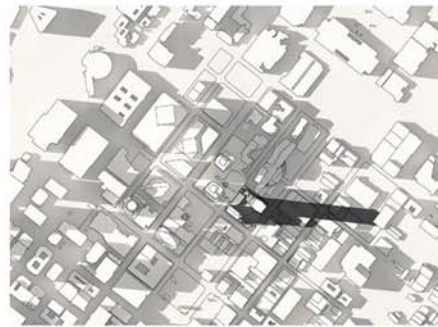
2:00 PM



3:00 PM

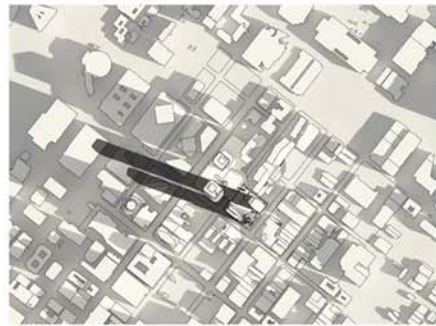


4:00 PM

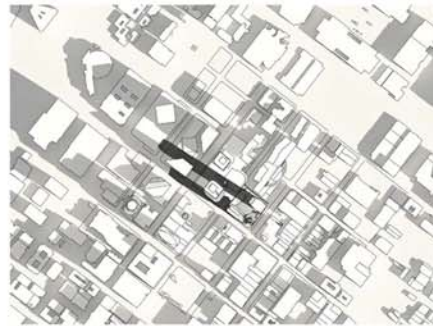


5:00 PM

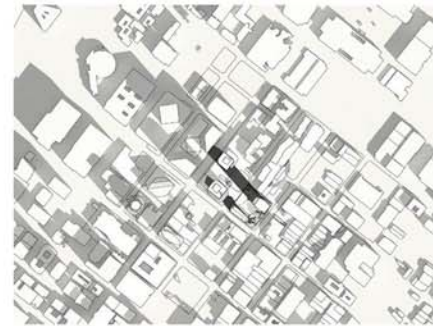
Figure 14
Project Shadows—Summer



9:00 AM



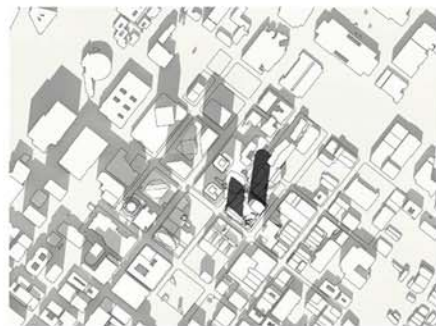
10:00 AM



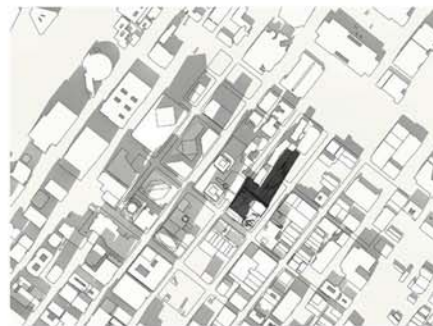
11:00 AM



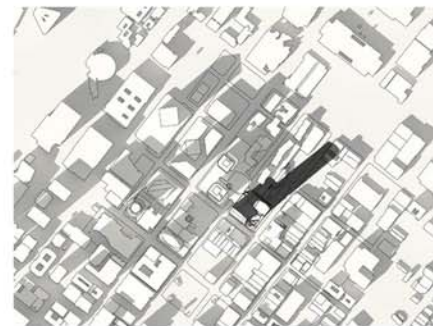
12:00 PM



1:00 PM



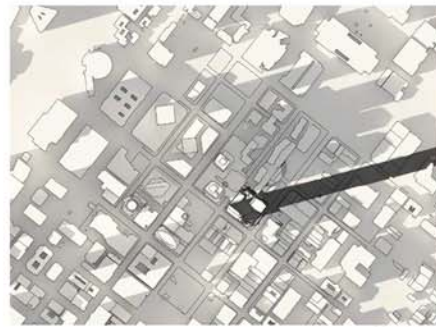
2:00 PM



3:00 PM



4:00 PM



5:00 PM

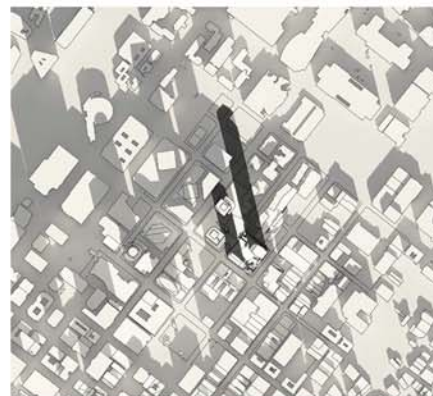
Figure 15
Project Shadows—Fall



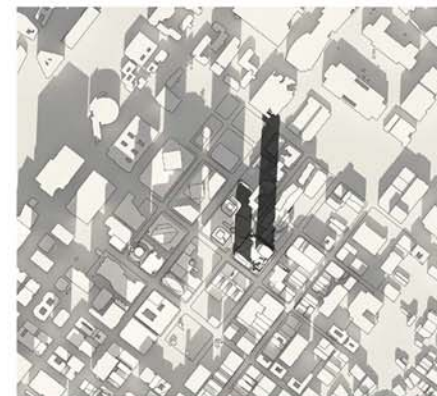
9:00 AM



10:00 AM



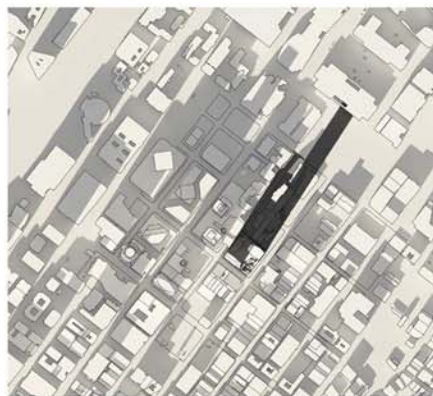
11:00 AM



12:00 PM



1:00 PM



2:00 PM



3:00 PM

Figure 16
Project Shadows—Winter

to move towards the northeast, shading portions of the Angelus Plaza buildings and Hill Street. At 4:00 P.M., Project shadows would continue to shade portions of the Angelus Plaza buildings and would shade portions of buildings along Hill Street, near 2nd Street, and portions of buildings located along 2nd Street between Hill Street and Broadway. This shading pattern would continue through 5:00 P.M. with Project shadows also extending past 2nd Street. While Project shadows would shade potentially routinely useable outdoor spaces for more than four hours during the spring equinox, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

As shown in Figure 14 on page 36, due to the higher position of the sun, Project shadows would be the shortest during the summer solstice. Specifically, at 9:00 A.M., Project shadows would extend southwest and shade only small portions of nearby buildings, including the frontage of the California Plaza property. This shading pattern would continue through 12:00 P.M. with Project shadows moving west. By 1:00 P.M., Project shadows would be almost completely off the California Plaza and would begin to shade the Angelus Plaza buildings. Project shadows would extend onto portions of the Angelus Plaza buildings through 3:00 P.M. At this time, Project shadows would also shade portions of buildings along Hill Street and across from the Angelus Plaza development. Project shadows would move northeast and east through 5:00 P.M. and shade additional buildings located in proximity to the Project Site. Due to the smaller shadows created during the summer solstice, Project shadows would not shade potentially routinely useable outdoor spaces for more than four hours. Therefore, no shading impact would occur during the summer solstice. Notwithstanding, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

As shown in Figure 15 on page 37, Project shadows during the fall equinox would be similar to those that would occur during the spring equinox, although the shadows would be shorter. Specifically, at 9:00 A.M., Project shadows would extend west across the urban landscape and would shade portions of the adjacent California Plaza towers as well as other buildings along the south side of 4th Street, including the Downtown YMCA and the CBRE Building. By 10:00 A.M., shadows would begin to move north off these uses and would primarily extend across 4th Street and across portions of buildings on the north side of 4th Street, including the California Plaza towers, the Bank of America courtyard, and The Court Wells Fargo Center. By 11:00 A.M., Project shadows would primarily extend across the California Plaza towers and shading only a portion of The Court Wells Fargo Center. This shading pattern would continue through 1:00 P.M. with Project shadows primarily extending across a portion of the California Plaza towers and shading only small portions of the nearby Museum of Contemporary Art and the Omni Los Angeles hotel. By 2:00 P.M., Project shadows would extend mostly north, shading a very small portion of the California Plaza and portions of the Angelus Plaza buildings. By 3:00 P.M., Project shadows would extend off the California Plaza and begin to move towards the northeast, shading portions of the Angelus Plaza buildings and Hill Street. At 4:00 P.M., Project shadows would continue to shade portions of the Angelus Plaza buildings and would shade portions of buildings along Hill Street, near 2nd Street, and portions of buildings located along 2nd Street between Hill Street and Broadway. This shading pattern would continue through 5:00 P.M. with Project shadows also extending past 2nd Street. While Project shadows would shade potentially routinely useable outdoor spaces for more than four hours during the fall equinox, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

Shadow impacts are typically greatest during the winter months due to the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. As shown in Figure 16 on page 38, Project shadows would extend across surrounding uses from 9:00 A.M. through 3:00 P.M. At 9:00 A.M., Project Shadows would extend to Interstate 110 and the World Trade Center Los Angeles. By 10:00 A.M., Project shadows would move off these uses and would extend towards The Court Wells Fargo Center and the Bunker Hill Towers. Also at 10:00 A.M., Project shadows would begin to shade a portion of the Angelus Plaza development. By 11:00 A.M., Project shadows would also move off these uses and extend across the California Plaza towers and the Angelus Plaza development to a construction site for the Metro Regional Connector. At 12:00 P.M., Project shadows would continue to extend across the California Plaza towers and the Angelus Plaza and would shade portions of The Broad museum and the Museum of Contemporary Art. At 1:00 P.M., Project shadows would have moved north and would continue to shade portions of the California Plaza and the Museum of Contemporary Art as well as the Angelus Plaza. This shading pattern would continue through 2:00 P.M., with shadows extending past 1st Street towards a Los Angeles County building. By 3:00 P.M., Project shadows would extend off the California Plaza and continue north past the Los Angeles County building. While Project shadows would shade potentially routinely useable outdoor spaces for more than three hours during the winter solstice, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

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

No Impact. New light sources introduced by the Project would incrementally increase nighttime illumination levels; and building materials, on-site lighting, and certain on-site uses could create glare. The Project Site is currently vacant with minimal sources of light or glare. The Project Site is in a highly urbanized section of downtown Los Angeles and is surrounded by urban infrastructure, street lighting, and mid- and high-rise buildings with sources of daytime and nighttime light and glare. Accordingly, the existing ambient conditions contain numerous sources of light and glare typical of a dense urban downtown environment. The views in the areas are composed of the urban infrastructure, high-rise buildings in Bunker Hill, and the mid- and lower-rise buildings in the Historic Core area.

Construction

The majority of Project construction would occur during daylight hours. However, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, especially during the winter time when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Furthermore, construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as previously discussed, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project-related construction activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

Operation

The Project Site is located within the highly urbanized downtown area of the City. Characteristic of an urban area, nighttime lighting in the Project Site vicinity results from numerous types of artificial light sources, including street lights, automobile lights, signage, residential and commercial building lights, and parking facilities. Existing lighting within the Project Site itself includes low output security lighting associated with Metro's Pershing Square Station. Glare sources within the Project Site are limited and may include architectural elements associated with Metro's Pershing Square Station.

The Project would replace the existing mostly vacant site with a new integrated, high-density, mixed-use development. As such, the Project would increase light and glare levels emanating from the Project Site. The Project would include lighting from within the buildings' interiors, lighting at the building exterior elevations, and lighting from internal driveways and walkways. New sources of exterior lighting that would be introduced by the Project would include: shielded low to medium output exterior lighting on the buildings and along pathways for security and wayfinding purposes; shielded low to medium output lighting to accent signage, architectural features, exterior artwork or murals, and landscaping elements; outdoor decorative lights of low to medium output; and interior lighting visible through the windows of the residential, hotel, and commercial uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project signage and artwork would be illuminated by means of low to medium output external lighting, internal halo lighting, or ambient light.

The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior lighting would be shielded and/or directed toward the areas to be lit within the Project Site to avoid light spillover onto adjacent sensitive uses, and would be dark-sky compliant. Project lighting would also comply with regulatory requirements, including the requirements that are set forth by CALGreen and Title 24 that stipulate the use of high-performance light with appropriate light and glare control according to Backlight, Uplight, and Glare standards. Exterior lighting to highlight the Project's signage and artwork would be shielded or directed toward the areas to be lit to avoid creating off-site glare.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, and aluminum. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result from illuminated signage and artwork, and from vehicle headlights. Headlights from vehicles entering and exiting the parking garage would be visible during the evening and nighttime hours, and such lighting sources would be typical for the area.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new significant impact. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project’s aesthetic impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

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

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. In addition, the uses surrounding the Project Site include residential, commercial, cultural arts, and open space uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also 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.^{11,12} Therefore, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned by the LAMC as C2-4D (Commercial Zone, Height District 4 with Development Limitation), which permits a mix of residential, educational, and commercial uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. While the Project Site is located within the City’s Urban Agriculture Incentive Zone Program, as provided by the City, the Urban Agriculture Incentive Zone does not change the existing zone

¹¹ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2016, map published July 2017.

¹² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 5, 2018.

and land use regulations and it does not permit new uses or further restrict existing uses.¹³ The Urban Agriculture Incentive Zone merely incentivizes urban agriculture in urbanized areas in California by offering reduced property tax assessments in exchange for using vacant or unimproved property for an agricultural use through a contract agreement for a period of five years.¹⁴ The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.¹⁵ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is zoned by the LAMC as C2-4D. The Project Site is not zoned as forest land or timberland nor is the Project Site used as forest land or timberland.¹⁶ In addition, no forest land or timberland is located adjacent to the Project Site. Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

No Impact. As described above, the Project Site is located in an urbanized area of the City and does not contain farmland or forest land. 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 impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

¹³ City of Los Angeles Department of City Planning. Recommendation Report regarding the proposed Urban Agriculture Incentive Zone, <https://planning.lacity.org/ordinances/docs/UrbanAgriculture/StaffReport.pdf>, accessed December 5, 2018.

¹⁴ City of Los Angeles Department of City Planning. Recommendation Report regarding the proposed Urban Agriculture Incentive Zone, <https://planning.lacity.org/ordinances/docs/UrbanAgriculture/StaffReport.pdf>, accessed December 5, 2018.

¹⁵ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act FY 2015/2016, map published 2016.

¹⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 5, 2018.

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.

	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead¹⁷). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). 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.¹⁸ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040

¹⁷ Partial Nonattainment designation for the Los Angeles County portion of the Basin only.

¹⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. Construction would include an excavation up to 170 feet in depth, hauling of dirt, and high-rise construction methods. In addition, operation of the project would introduce new energy usage and mobile source emissions related to nearly 1.3 million square feet of development. As a result, development of the Project could have a potential adverse effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

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?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM_{2.5}, and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. Implementation of the Project could potentially contribute to additional air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Expose sensitive receptors to substantial pollutant concentrations?

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

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

Less Than Significant Impact. Construction of the Project would involve the use of conventional building materials 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 adversely affect a substantial number of people.

With respect to operation of the Project, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The Project would include residential, hotel, civic, and commercial uses. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding

visible emissions violations.¹⁹ Additionally, construction and operation of the Project would comply with SCAQMD Rule 402, which states 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.²⁰ Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people. Potential odor impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹⁹ SCAQMD, Visible Emissions, Public Nuisance & Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed June 12, 2018.

²⁰ 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the Biological Resource Assessment Memorandum prepared for the Project by GPA Consulting, dated February 27, 2019. The Biological Resource Assessment Memorandum is included as Appendix IS-1 of this Initial Study.

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 Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. Landscaping within the Project Site includes unmaintained ornamental shrubs and trees dispersed throughout the Project Site. Due to the disturbed nature of the Project Site and the surrounding urban areas, and lack of open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Specifically, according to the Biological Resource Assessment Memorandum, a habitat assessment for special-status plants found no areas capable of supporting special-status plants. In addition, according to the Biological Resource Assessment Memorandum, no special-status animal species occur within the Project Site due to a lack of suitable habitat on the Project Site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.²¹ Therefore, 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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 Game or U.S. Fish and Wildlife Service?

²¹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B, Biological Resource Areas.

No Impact. No riparian or other sensitive natural community exists on the Project Site or vicinity.^{22,23} The Project Site is also not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{24,25} In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the US Fish and Wildlife Service.^{26,27,28} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

No Impact. The Project Site is located in an urbanized area and the surrounding area has been fully developed and no water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the vicinity.²⁹ As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant. As described above, the Project Site is located in an urbanized area. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space within and surrounding the Project Site that provide linkages to natural open spaces areas and which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.³⁰ As concluded in the Biological Resource Assessment Memorandum, the entire study area is surrounded by dense urban development and exhibits no potential as a wildlife corridor.

²² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 11, 2018.

²³ United States Environmental Protection Agency, NEPAAssist, www.epa.gov/nepa/nepassist, accessed June 12, 2018.

²⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B, Biological Resource Areas.

²⁵ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, 2015.

²⁶ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed June 12, 2018.

²⁷ California Department of Fish and Wildlife, CDFW Lands Viewer, www.wildlife.ca.gov/Lands, accessed June 12, 2018.

²⁸ United States Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, www.fws.gov/wetlands/index.html, accessed June 12, 2018.

²⁹ United States Environmental Protection Agency, NEPAAssist, www.epa.gov/nepa/nepassist, accessed June 12, 2018.

³⁰ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

As discussed in the Biological Resource Assessment Memorandum, the Project Site includes vegetation that has the potential to support nesting birds and bats. Therefore, the on-site vegetation that would be removed during construction of the Project could potentially provide nesting sites for migratory birds and bats. With regard to nesting birds, the Project would comply with the Migratory Bird Treaty Act, 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. To ensure compliance with the Migratory Bird Treaty Act, surveys are required to determine if nests will be disturbed and, if so, a buffer area with a specified radius around the nest must be established so that no disturbance or intrusion occurs until the young have fledged and 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 judgement of the monitoring biologist, in coordination with CDFW. Additionally, California Fish & Game Code Section 3503 (Section 3503) 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.” No exceptions are provided in the code and CDFW has never promulgated any regulations interpreting these provisions.

To clarify steps that the Project would take to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement Project Design Feature BIO-PDF-1, provided below. In addition, the Project would implement Project Design Feature BIO-PDF-2 to ensure bats are protected during vegetation removal.

BIO-PDF-1: If vegetation trimming or clearing is conducted during the nesting season (typically February 1 through September 15), nesting bird surveys shall be completed by a qualified biologist within 300 feet of suitable bird-nesting habitat and 500 feet of suitable raptor-nesting habitat no more than 48 hours prior to trimming/removal activities to determine if nesting birds are within the affected vegetation. Surveys shall be repeated if trimming or removal activities are suspended for five days or more. If nesting birds/raptors are found in the construction area, appropriate buffer areas (typically up to 300 feet for songbirds and 500 feet for raptors) shall be implemented to ensure that nesting birds and active nests are not harmed.

BIO-PDF-2: During the summer months (June to August) prior to construction, a bat roosting habitat assessment shall be conducted of all trees and structures to be removed or otherwise impacted during construction. If the assessment determines that bats could be roosting in the Biological Study Area (BSA) during construction, then visual and acoustic surveys shall be conducted for at least two nights at identified roosting habitat in the BSA to assess the presence of roosting bats. If presence of a roost is detected, then a count and species analysis shall be completed to help assess the type of colony and usage. If the presence or absence of bats cannot be confirmed during the potential roosting habitat assessment, then a qualified biologist shall be on-site during removal or disturbance of this area. If the biologist determines that bats are being disturbed during this work, work shall be suspended until bats have left the vicinity on their own or can be safely excluded under direction of the biologist. Work may resume upon approval by a qualified biologist, in compliance with this measure. In the event that a maternal colony of bats is found on the project site, no work shall be conducted within 100 feet of the maternal roosting site until the maternal season is finished or the bats have left the site, or as otherwise directed by a qualified biologist.

With adherence to existing regulations and further direction provided in BIO-PDF-1 and BIO-PDF-2, the potential impact would be less than significant. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the ordinance and are not considered protected. The City of Los Angeles Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” According to the Tree Report included in Appendix IS-2 of this Initial Study, there are 131 trees located within the Project Site and eight trees located adjacent to the Project Site, within the City right-of-way, that would be removed as part of the Project. Based on the Tree Report, none of the trees within the Project Site or the streets adjacent to the Project Site are considered protected trees per the City’s Protected Tree Ordinance.

California Plaza and begin to move towards the northeast, shading portions of the Angelus Plaza buildings and Hill Street. At 4:00 P.M., Project shadows would continue to shade portions of the Angelus Plaza buildings and would shade portions of buildings along Hill Street, near 2nd Street, and portions of buildings located along 2nd Street between Hill Street and Broadway. This shading pattern would continue through 5:00 P.M. with Project shadows also extending past 2nd Street. While Project shadows would shade potentially routinely useable outdoor spaces for more than four hours during the spring equinox, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project’s aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

The Project would include the planting of new trees and landscaping throughout the Project Site, including new gardens and landscaped courtyards and terraces. Prior to the issuance of any permit, during plan check review, the Applicant would be required to submit a plot plan demonstrating a minimum 1:1 replacement ratio of existing significant, non-protected trees. Further, approval a Tree Removal Permit by the Board of Public Works per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services, would be required prior to issuance of a Certificate of Occupancy. Review and approval of the Tree Removal Permit would ensure street trees are replaced in accordance with City policy. All other landscaping would comply with all requirements of the LAMC and the City’s Urban Forestry Division’s requirements.

Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. Overall, Project impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site does not support any habitat or natural community.^{31,32} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.³³ Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. 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 historic 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 Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). 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 an historical resource, provided the lead agency’s determination is supported by substantial evidence in

³¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 11, 2018.

³² United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 10, 2018.

³³ California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 10, 2018.

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 historic resources throughout the City.

As previously described, the Project Site is primarily vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. While there are no historical resources within the Project Site, the Project Site is bounded by the historic Angels Flight railway on the north, which is a designated historic resource (listed on the National Register of Historic Places, the California Register of Historical Resources, and as City-designated Historic-Cultural Monument No. 4) for its architecture, engineering, and function. Therefore, further evaluation of the Project’s potential impacts on this adjacent historic resource will be included in an EIR.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is primarily vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. The Project would require grading of the Project Site and excavations up to 110 to 170 feet below grade that could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project’s potential impacts to archaeological resources.

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

Potentially Significant Impact. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities, such as grading and excavation. Therefore, further analysis of the Project’s potential impacts on human remains will be included in an 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. The Project would include 180 residential for-sale condominium units, 261 residential apartments (including a mix of market rate and affordable units), two hotels with a combined total of 509 guest rooms, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. The Project would result in up to 1,269,150 square feet of new floor area. Therefore, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under Senate Bill 1078, California's Renewable Portfolio Standards require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.³⁴ The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

³⁴ CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed October 8, 2018.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2016 Title 24 standards, which became effective on January 1, 2017.³⁵ The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.³⁶

As previously described, the Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. The Project Site does not include any renewable energy sources used by LADWP. In addition, as discussed in Section 3, Project Description, of this Initial Study, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project’s compliance with LADWP’s plans for renewable energy as well as the Project’s compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

a. 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, caused in whole or in part by the project’s exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. Strong seismic ground shaking caused in whole or in part by the project’s exacerbation of the existing environmental conditions? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

³⁵ CEC, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed October 8, 2018.

³⁶ CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on a Geotechnical Investigation and a Geotechnical Evaluation conducted for the Project Site by Wood Environment & Infrastructure Solutions, Inc., both dated July 6, 2018 (Revised March 2019) and collectively referred to herein as the Geotechnical Report. All specific information on geologic and soils conditions in the discussion below is from these reports unless otherwise noted. The reports are included as Appendix IS-3 of this Initial Study.

a. 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? 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, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 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 younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. 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). These zones, which extend from 200 feet 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 of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Geotechnical Report, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area.³⁷ The closest active fault to the Project Site is the Hollywood Fault located approximately 4.4 miles north of the Project Site. In addition, while the vertical surface projection of the Upper Elysian Park Fault upper limb is approximately one mile northeast of the Project Site, as with other blind thrust faults in the Los Angeles area, the Upper Elysian Park Fault is not exposed at the surface and does not present a potential surface rupture hazard. As such, no active faults with the potential for surface fault rupture are known to be located directly beneath the Project Site or projecting toward the Project Site. Therefore, the potential for surface rupture at the Project Site is considered low. The Project also would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the Earth's crust. As such, the Project's impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. As noted above, the closest active fault to the Project Site is the Hollywood Fault located approximately 4.4 miles north of the Project Site. In addition, the vertical surface projection of the Upper Elysian Park Fault upper limb is approximately one mile northeast of the Project Site. According to the Geotechnical Report, the Upper Elysian Park Fault should be considered an active feature capable of generating future earthquakes. A maximum moment magnitude of 6.4 is

³⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 11, 2018.

estimated for the Upper Elysian Park Fault. However, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety 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 current seismic design provisions of the 2016 California Building Code, with City amendments, to minimize seismic impacts. The 2016 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 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 the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Thus, impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, lateral spreading, and bearing capacity failures below structural foundations.

As discussed in the Geotechnical Report, according to the City of Los Angeles NavigateLA database and the California Division of Mines and Geology, the majority of the Project Site is not within an area identified as having a potential for liquefaction. According to the California Geological Survey (see Figure 6 in the Geotechnical Investigation included in Appendix IS-3), a small area in the southeastern portion of the Project Site is identified as having a potential for liquefaction. However, based on the Geotechnical Report, due to the planned excavations of approximately 110 feet to 170 feet below grade, which would extend through the existing fill and alluvium and into the underlying bedrock, the potential for liquefaction to occur at the Project Site would be considered low. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. As such, impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. As previously described, the Project Site is located in the highly urbanized and built-out downtown area of the City. In addition, while the Project Site is mostly vacant except for Metro's Pershing Square Station and has slopes ranging from approximately 4:1 to 2:1 (horizontal to vertical), the Project Site is landscaped and does not include exposed soils. Therefore, the Project Site does not currently include expanses of exposed soils which could result in a landslide during a rain event. The Project also would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. The Project would excavate the entire site and remove the soils. The Project would then replace the existing site conditions with concrete foundations and infrastructure to support the proposed structures. This redevelopment eliminates the potential for landslides. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to ensure that substantial soil erosion does not occur. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential for soil erosion would be relatively low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, including the National Pollutant Discharge Elimination System Permit requirements and City grading requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. As discussed above, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, impacts related to landslides would be less than significant, and no mitigation measures are required.

As previously noted, liquefaction-related effects include lateral spreading. As evaluated above, the potential for liquefaction to occur at the Project Site is considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Impacts related to lateral spreading would be less than significant, and no mitigation measures are required.

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. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, impacts related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, the potential for liquefaction to occur at the Project Site is considered low. Excavation at the Project Site would remove soils that could be subject to liquefaction and be at depths through fill and alluvium into bedrock. Impacts associated with liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.³⁸ According to the Geotechnical Report, the fill soils that underlie the Project Site consist of artificial fill composed of sandy silt to clay varying from a thin layer (less than one foot) in the upper portion of the Project Site to a thickness of more than 13 feet in the lower portion, adjacent to Hill Street. Below the artificial fill is alluvium consisting of poorly to well-graded sand, silty sand, and clayey silt with variable gravel and cobble content. Bedrock of the Fernando Formation underlies the alluvium. The Fernando Formation generally consists of massive and poorly-to-moderately well bedded clayey and sandy siltstone and silty fine sandstone. Therefore, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. As such, the Project would not 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 collapse. Impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The resulting volumetric changes in soils can heave and crack lightly-loaded foundations and structures. According to the Geotechnical Report included in Appendix IS-3 of this Initial Study, the soils at the Project Site are anticipated to be primarily of low expansion potential. However, moderately expansive soils could be locally present. Notwithstanding, as previously discussed, the Project would involve excavations up to approximately 110 feet to 170 feet below grade, which would include the removal of all underlying soil up to that depth. Engineered soils and structures would then be used to construct the Project, thereby addressing potential effects resulting from expansive soils. Therefore, the Project would not create substantial direct or indirect risks to life or property associated with expansive soils. Impacts would be

³⁸ Associated of Environmental & Engineering Geologists. Expansive and Collapsible Soil, www.aegweb.org/?page=ExpansiveSoil, accessed January 9, 2019.

less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project’s wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is primarily vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. The Project would require grading of the Project Site and excavations up to approximately 110 feet to 170 feet below grade that could have the potential to disturb previously undiscovered paleontological resources. Therefore, the EIR will provide further analysis of the Project’s potential impacts to paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth’s temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project’s greenhouse gas emissions.

b. 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 emit greenhouse gases during construction and operation activities. Therefore, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill 32, the City of Los Angeles Green Building Code, and SCAG’s RTP/SCS).

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on a Phase I Environmental Site Assessment (June 12, 2018, Revised March 11, 2019) and a Phase II Environmental Site Assessment (March 12, 2019) conducted for the Project Site by Wood Environment & Infrastructure Solutions, Inc. These reports are included as Appendix IS-4 of this Initial Study.

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

Less Than Significant Impact. The Project would not involve the routine transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning

the use, storage, and management of hazardous materials, including, but not limited to RCRA, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the City of Los Angeles Department of Building and Safety. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction, and development of the Project on the Project Site would not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential, hospitality, educational/civic, and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping and pools. Such use would be consistent with that currently occurring at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Due to the type of development proposed (e.g., residential and commercial), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Phase I Environmental Site Assessment (ESA), in conformance with American Society for Testing and Materials (ASTM) Standard E1527-13, included a review of environmental and historical records for the Project Site and a site reconnaissance to identify potential on-site hazards. A review of maps and aerial photographs revealed that the Project Site was primarily occupied by single- and multiple-family residential buildings from the 1880s through the early 1900s. The northwestern portion of the Project Site (along South Olive Street) primarily remained occupied by residential buildings through the 1950s and 1960s. The residential buildings on the remainder of the Project Site (along South Hill Street and West 4th Street) were generally demolished by the early 1900s and replaced with commercial and retail buildings, the uses of which included office space, restaurants, hotels and various retail businesses. These commercial and retail buildings were demolished during the 1960s, and the Project Site was comprised of vacant land and automobile parking lots from approximately 1970 through the mid-1990s. In approximately 1995, the on-site Metro subway portal and associated plaza was constructed. The Project Site has remained relatively unchanged between the mid-1990s and the present.

During the site reconnaissance visit, no evidence of aboveground storage tanks (ASTs) or underground storage tanks (USTs), unusual odors, pools of liquid and standing surface water, pits ponds, lagoons,

drums, hazardous substances or petroleum products storage containers, unidentified substance containers, stains or corrosion, stained soil/pavement or stressed vegetation, solid waste or imported fill soil, wastewater discharge systems, septic systems, or wet areas or surface water bodies were identified on-site.³⁹ In addition, no pad- or pole-mounted transformers or electrical control panel equipment, which could contain polychlorinated biphenyls (PCBs), was observed on-site. However, two unmarked concrete pads with steel plates, presumably covering an access vault, were observed near the southwestern edge of the Project Site along 4th Street with the letters “LADWP” inscribed/welded on both steel plates. Based on these observations, these structures appeared to be former locations of electrical transformers. Some very minor staining was noted on the concrete pads. The LADWP supplies power to the Project Site and would be responsible for any leaking transformers or electrical equipment that they own. During the site reconnaissance visit, a grate-covered inlet drain was observed in the plaza planter area. A concrete-lined drainage swale, located on the slope approximately two to three feet behind the top of the plaza area retaining wall, terminates in the undeveloped sloped area in the central portion of the Project Site. Two relatively new-appearing drain pipes exit the undeveloped sloped area on the south-southwestern portion of the Project Site and turn to reenter the undeveloped slope slightly above the plaza level. The pipes were not labeled with respect to their use or purpose on-site but are suspected to be possibly associated with drainage behind the existing retaining wall.⁴⁰

The Phase I ESA prepared for the Project did not include building material samples for PCBs, asbestos, and lead-based paint. Specifically, as no buildings exist on the Project Site, such materials are unlikely to represent an environmental concern.

Based on the Phase I ESA, three recognized environmental conditions (RECs) were identified.⁴¹ Two USTs containing fuel oil were installed on the southern corner of the Project Site (357 South Hill Street)—one in 1922 and the other in 1954. A UST with a different listed capacity than the two fuel oil USTs was abandoned in-place in 1967. These three USTs would have been located in the general vicinity of the current Metro subway portal on the southern corner of the Project Site and may have been removed during the portal construction in the 1990s. However, Wood Environment & Infrastructure Solutions, Inc. did not review or receive documentation that confirmed these USTs had been removed. Thus, based on the assessment, Wood Environment & Infrastructure Solutions, Inc. recommended conducting a geophysical survey along the perimeter of the Metro subway portal (including beneath the West 4th Street sidewalk area) to identify potential subsurface anomalies indicative of USTs. This geophysical survey was conducted as part of the Phase II ESA also included in Appendix IS-4 of this Initial Study. As discussed therein, while two subsurface anomalies were identified during the geophysical survey conducted on the southeastern portion of the Project Site, the electromagnetic and/or ground penetrating radar signatures were not consistent with that of a typical UST. However, some interference from nearby metallic features (e.g., chain link fence) may have affected the accuracy of the electromagnetic instrument, and the potential that buried debris/USTs might be encountered during site excavation

³⁹ Wood Environment & Infrastructure Solutions, Inc., Phase I Environmental Site Assessment, Proposed Angels Landing Project, June 12, 2018, Revised March 11, 2019. See Appendix IS-4.

⁴⁰ Wood Environment & Infrastructure Solutions, Inc., Phase I Environmental Site Assessment, Proposed Angels Landing Project, June 12, 2018, Revised March 11, 2019. See Appendix IS-4.

⁴¹ RECs do not include *de minimis* conditions that generally do not present a material risk of harm to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

activities cannot be discounted. In the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, with compliance with applicable regulations, 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 the environment, and impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required.

The two remaining identified RECs include a former laundry facility and a former printing business. The former laundry facility was located on-site (423 West 4th Street) between the 1920s and at least 1958. Information reviewed during this assessment suggests that the operations may have included dry cleaning. Dry cleaning facilities are commonly associated with soil, soil vapor and groundwater contamination due to the use of petroleum- and chlorinated-based solvents. The former printing business was located on-site (329-331 South Hill Street) between approximately 1934 and 1950. The use of various inks, pigments and solvents was common in the printing business during this time period. Additionally, environmental awareness practices with respect to the use, storage and disposal of such chemicals was not conducted. As the potential for subsurface impacts resulting from the former cleaners and printing operations on the site cannot be discounted, Wood Environment & Infrastructure Solutions, Inc. recommended conducting a subsurface investigation in the Phase I ESA, consisting of soil and soil vapor sampling, to evaluate for the presence of suspect contaminants commonly associated with such business activities. This evaluation, and additional evaluation to address other potential concerns, as identified below, were conducted as part of the Phase II ESA.

The Phase I ESA identified four additional items related to the Project Site that while not considered RECs could be potential concerns to the Project Site. Specifically, an industrial waste discharge permit was issued for a site business (425 West 4th Street) for an auto wash rack. Also, the Project Site (350 South Olive Street) was listed as an automobile repair shop in 1924. Furthermore, an industrial waste discharge permit was issued for a site business (345 South Hill Street) associated with bleed-off from a cooling tower that served 10 tons of air conditioning. The discharge was reportedly to the sanitary sewer system. As water treatment chemicals (e.g., chromium) were commonly added to cooling tower waters to prevent corrosion and algae growth within system equipment and piping, cooling towers can be associated with chromium and hexavalent chromium contamination.

As discussed in the Phase II ESA, excavation activities could encounter contaminated soil that would require proper handling and disposal. Excavation on the Project Site would extend approximately 110 feet to 170 feet below grade and remove potentially contaminated soils according to regulatory requirements. Specifically, in the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.⁴² Specifically, SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or

⁴² South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed November 8, 2018.

pipings which has stored volatile organic compounds (VOCs); the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be on-site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. When VOC-contaminated soil is detected, the approved mitigation plan would be implemented.

Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

In addition, in the event dewatering is required during construction of the Project, any discharge of groundwater would occur pursuant to, and comply with, the applicable National Pollutant Discharge Elimination System permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine contamination and the appropriate treatment and/or disposal methods. With compliance with relevant regulations and requirements, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of extracted groundwater.

According to ZIMAS, the Project Site is not located within a Methane Zone. In addition, based on data from the California Division of Oil, Gas and Geothermal Resources (DOGGR), the Project Site is located approximately 0.8 mile south of the Los Angeles City Oil Field and 0.6 mile northeast of the Los Angeles Downtown Oil Field. The closest known oil exploration wells are located approximately 0.5 mile north and south of the Project Site. Per DOGGR, those wells are classified as “active producer” and “dry hole,” respectively. Since the Project Site is near active oil fields, there is a remote possibility that undocumented abandoned wells or other undocumented wells could be encountered during excavations. Any wells encountered during construction would be required to be abandoned in accordance with current DOGGR standards and regulations.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Existing schools within a one-quarter mile of the Project Site include the Colburn School located at 200 South Grand Avenue. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the

proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. The Project is programmed to include an educational component. However, the operation of the Project would not emit hazardous materials or handle hazardous wastes within the Project Site that could affect the operation of an educational space on-site. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes within 0.25 mile of an existing school would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I included the results of consultation with local agency representatives and a review of available federal, state, tribal, local, and Environmental Data Resources, Inc. databases including, but not limited to, Envirostor, Geotracker, ZIMAS, and the Division of Oil, Gas, and Geothermal Resources. The Project Site is listed in Environmental Data Resources, Inc. databases for the former automobile repair shop (350 South Olive Street) and former laundry facility (423 West 4th Street). However, information contained under this site listing does not necessarily imply that the facility performed dry cleaning activities, used various cleaning solvents/degreasers, and/or a release had occurred.⁴³ Information obtained from the City of Los Angeles Fire Department also shows that three USTs were likely installed at the Project Site (357 South Hill Street) consisting of a 2,135 gallon crude oil tank; a 1,900 gallon fuel oil tank; and a 4,000 gallon tank (contents unknown). Additionally, documents obtained from the City of Los Angeles Sanitation District indicate an automobile wash rack was previously operated at the site

⁴³ Dry cleaner facilities are commonly associated with soil, soil vapor and groundwater contamination due to the use of chlorinated solvents. During the 1920s, petroleum-based solvents were primarily used while chlorinated-based solvents (e.g., trichloroethylene and tetrachloroethylene) started being used in the 1930s and 1940s.

(425 West 4th Street). Wood Environment & Infrastructure Solutions, Inc. screened the other identified property listings for significance with respect to their potential impact on the Project Site based on reasonably ascertainable information obtained from the records review, site reconnaissance, and interviews. Two possible former cleaner facilities operated on off-site–adjacent properties (separated from the Project Site by streets) during the 1920s and 1930s. However, based on distances from the Project Site boundary, the types of listings, and/or the assumed direction of groundwater flow, these and the other off-site listed facilities were not considered to have a potential impact on the Project Site.

Additional environmental record sources were reviewed to enhance and supplement the standard environmental record sources. Wood Environment & Infrastructure Solutions, Inc. contacted various regulatory agencies via e-mail, fax or online to ascertain whether the respective agencies maintain files associated with the historical site address ranges of 329–361 South Hill Street (odd numbers), 401–429 West 4th Street (odd numbers) and 324–358 South Olive Street (even numbers). The following agencies confirmed that the Project Site does not appear as a listed facility or any records: Los Angeles Regional Water Quality Control Board, CalEPA DTSC, Los Angeles County Public Health Investigations Unit, SCAQMD, and Los Angeles County Fire Department—Health Hazardous Materials Division. The National Pipeline Mapping System also showed that no known large gas (i.e., liquid petroleum) or hazardous liquid transmission lines are located on or adjacent to the Project Site. The DTSC Hazardous Waste Tracking System website was reviewed to identify whether hazardous wastes have been generated at the Project Site. The Project Site location (or possibly the adjacent Angels Flight property to the northeast) was listed as 351 South Hill Street with the owner identified as “TEG The Env Group.” An EPA identification number of CAC001033616 was issued for two manifests and 1.89630 tons of waste. The status is listed as “inactive” and was last updated on October 25, 2000, and the waste type description was not included on the DTSC form.

As discussed above, based on the Phase I ESA, three recognized environmental conditions (RECs) were identified on the Project Site, including the potential for USTs and potential soil contamination associated with a former laundry facility and a former printing business. In the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Similarly, in the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Furthermore, as discussed above, the types and amounts of hazardous materials used during operation of the proposed residential, hospitality, educational/civic, and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. In addition, the Phase II ESA further investigated the Project Site and concluded that soil conditions, and any potential USTs discovered during excavation activities, could be adequately handled by adherence to regulatory requirements. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used 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.

Based on the above, the Project would not create a significant hazard to the public or the environment related to the Project Site’s inclusion on a list of hazardous materials sites. Impacts would be less than

significant, and no mitigation measures are required. 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 an airport land use plan or within two miles of an airport. The nearest airport to the Project Site is Los Angeles International Airport, which is located approximately 12 miles southwest of the Project. Given the distance between the Project Site and Los Angeles International Airport, the Project would not have the potential to result in a safety hazard or excessive noise. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, none of the streets directly adjacent to the Project Site are designated disaster routes.⁴⁴ The nearest designated disaster routes to the Project Site are Figueroa Street approximately 0.3 mile to the west and Temple Street approximately 0.5 miles to the north. 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 lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the vicinity of the Project Site and would result in some modifications to site access. Specifically, vehicular access to the Project Site would be provided via two access points, including one at Olive Street and another at 4th Street. However, the Project would comply with LAFD access requirements and operation of the Project would comply with all applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan. Therefore, Project impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

⁴⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

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

No Impact. There are no wildlands located within or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,⁴⁵ nor is it located within a City-designated fire buffer zone.⁴⁶ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed uses would not create a fire hazard. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. No impact related to wildland fires would occur, and no mitigation measures are required. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁴⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 11, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

⁴⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Hydrology and Water Quality Report prepared for the Project by KPFF Consulting Engineers, dated March 20, 2019. This report is included in Appendix IS-5 of this Initial Study.

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The following analysis considers the Project’s potential impacts on both surface water and groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs to be used during construction to manage stormwater and non-stormwater discharges. BMPs would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

While not anticipated, Project construction activities could encounter groundwater and dewatering may be required. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction,

temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the requirements of the Los Angeles Regional Water Quality Control Boards' Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of site-specific BMPs included as part of the SWPPP and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, hospitality, educational/civic, and commercial uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. 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 capture and use or biofiltration planter BMPs as established by the LID Manual. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards. The implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements, and impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

Project construction activities could encounter groundwater and temporary dewatering may be required. In the event dewatering is required during Project construction, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

Other potential effects to groundwater quality could result from the presence of an underground storage tank or during the removal of an underground storage tank. As previously described, there is a potential for a UST or USTs to be present within the Project Site. As discussed above, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, potential on-site USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. As discussed in detail above, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. In addition, while unlikely considering that the Phase I ESA concluded there are no oil wells on the Project Site, if any previously abandoned and unknown oil wells are located, the wells would be unearthed and inspected by the DOGGR to assess and prescribe abandonment procedures based on their observed condition. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil or oil wells.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, 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 potential for hazardous materials to be released 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. In addition, as there are no existing 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.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. The Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that 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. Therefore, operation of the Project would not result in

discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the Supplemental EIR is required.

b. 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 activities for the Project would include excavations up to 110 feet to 170 feet below grade. Exploratory borings conducted at the Project Site encountered groundwater in borings at 270 feet below grade on the upper portion of the Project Site.⁴⁷ In prior reports by LeRoy Crandall and Associates, dated May 9, 1988 and supplemental studies dated December 2, 1988, seepage was encountered at depths of 47 feet and 63 feet within the bedrock. As localized seepage indicates a perched groundwater condition that most likely fluctuates with seasonal precipitation, dewatering operations may be expected. However, due to the limited and temporary nature of temporary dewatering operations, impacts to groundwater supplies and management of the basin are not considered to be significant. The Project Site contains pervious surfaces in the existing condition, with a portion of the Project Site containing the subterranean Metro Pershing Square Station. The Project Site is not a material source of groundwater recharge for the basin. Furthermore, no water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction. Thus, construction activities for the Project would not substantially decrease groundwater supplies such that the Project would interfere substantially with groundwater recharge or impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

With regard to operation, the Project Site is currently comprised of approximately 20 percent impervious surfaces. With implementation of the Project, the Project Site would be comprised of 100 percent impervious surfaces. While the Project would increase impervious surfaces, consistent with the City's 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 capture and use BMPs as established by the LID Manual. The implementation of these BMPs would capture rainfall and use it for landscape irrigation. In addition, the subterranean levels of the Project would be designed to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods such that permanent dewatering operations would not be required. Therefore, the Project would not substantially decrease groundwater supplies such that the Project would impede sustainable groundwater management of the basin. Impacts on groundwater supplies during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁴⁷ Wood Environment & Infrastructure Solutions, Inc., Report of Geotechnical Evaluation for Entitlement Documents (Geotechnical Services Phase B), Proposed Angels Landing Development, July 6, 2018, Revised March 15, 2019. See Appendix IS-3.

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;

Less Than Significant Impact. The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include demolition of existing hardscape and the excavation and removal of soil. These activities 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. Exposed and stockpiled soils could also 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 Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are 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 (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, 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, siltation, or flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

As discussed in the Hydrology and Water Quality Report, the Project Site is currently comprised of 20 percent impervious surfaces. At buildout of the Project, the Project Site would be comprised of approximately 100 percent impervious areas. The Project Site would consist of one drainage area, which would drain via building roof drains, surface flow and subterranean drainage to a proposed capture and use tank. Stormwater would then be used for irrigation, and overflow would discharge through the curb face along Hill Street. The Project Site runoff would flow in the gutter to the catch basin located at the intersection of Hill Street and 4th Street on Hill Street. This catch basin connects to the existing 24-inch pipe. While there would be an increase in imperviousness of the Project Site, this increase would not significantly increase the amount of runoff from the Project Site due to the stormwater infrastructure and catch basin incorporated to the Project. Specifically, in terms of a 50-year frequency design storm event, the expected total increase in runoff within the Project Site would be 0.27 cubic feet per second, a 3.9 percent increase from the 6.89 cubic feet per second during pre-Project conditions. Furthermore, while the Project would slightly increase the 50-year peak flow rate from the Project Site, the existing site runoff pattern would remain. Even in the built condition, stormwater would continue to flow from Olive Street to Hill Street, west to east across the Project Site, and discharge onto Hill Street. The Hydrology and Water Quality Report concluded that the Project would not cause flooding, would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-project hydrology conditions in either normal or peak stormwater scenarios. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding

would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. 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 offsite;

Less Than Significant Impact. No streams or rivers cross the Project Site. While there would be an increase in imperviousness of the Project Site, this increase would not substantially increase the amount of runoff from the Project Site. As discussed above, the Project would result in a 3.9 percent increase from the 6.89 cubic feet per second during pre-Project conditions. The Hydrology and Water Quality Report concluded that this increase is not substantial; and that the Project would not cause flooding, would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-project hydrology conditions in either normal or peak stormwater scenarios. Flows would be accommodated by the existing stormwater treatment and conveyance system. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- and off-site. Project impacts would be less than significant, and no mitigation measures would be 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 discussed above, while there would be an increase in imperviousness of the Project Site, this increase would not substantially increase the amount of runoff from the Project Site. Flows would be accommodated by the proposed stormwater treatment and conveyance system. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. In addition, the Hydrology and Water Quality Report concluded that the Project would not cause flooding, would not create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-project hydrology conditions in either normal or peak stormwater scenarios. Thus, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff. Project impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a designated 100-year flood hazard area as mapped by the Federal Emergency Management Agency or by the City of Los Angeles.^{48,49} The Project Site is located in an urbanized area of downtown Los Angeles and there are no rivers, streams, or other water

⁴⁸ Federal Emergency Management Agency, Flood Insurance Rate Map, Panel 1636 of 2350, Map Number 06037C1636F, effective September 26, 2008.

⁴⁹ Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

bodies (natural or urban) that could flood flow on or through the Project Site. Therefore, the Project would not impede or redirect flood flows. No Project impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood hazard area as mapped by the Federal Emergency Management Agency or by the City of Los Angeles, or near any urban or natural water bodies.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Project Site is located approximately 13 miles from the coastline and at an elevation of approximately 300 feet above mean sea level.⁵⁰ According to the Safety Element of the General Plan, the Project Site is not mapped within an area potentially affected by a tsunami.⁵¹ The Los Angeles River is located approximately 1.15 miles east of the Project Site, but includes a sunken concrete lined channel; therefore, inundation as a result of seiche is unlikely. Thus, Project impacts related to release of pollutants due to Project inundation by tsunami or seiche would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. 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 Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the 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). As discussed in the Hydrology and Water Quality Report, the Project Site is located within the Los Angeles River Watershed Reach 2 in the Los Angeles Basin. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Los Angeles River Reach 2 under California's Clean Water Act Section 303(d) List include cadmium (sediment), copper (dissolved), lead, selenium, zinc, E. Coli, and trash.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. The EWMP for the Upper Los Angeles River Watershed was approved by the LARWQCB in April 2016. The EWMP for the Upper Los Angeles River Watershed provides a customized compliance pathway that participating agencies will follow to address the pollutant reduction requirements

⁵⁰ Wood Environment & Infrastructure Solutions, Inc., Report of Geotechnical Evaluation for Entitlement Documents (Geotechnical Services Phase B), Proposed Angels Landing Development, July 6, 2018, Revised March 15, 2019. See Appendix IS-3.

⁵¹ Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

of the 2012 Municipal Separate Storm Sewer System (MS4) Permit. The EWMP utilizes a multi-pollutant approach that maximizes the retention and use of urban runoff as a resource for groundwater recharge and irrigation, while also creating additional benefits for the communities in the Upper Los Angeles River Watershed. The EWMP presents a range of watershed control measures to address applicable stormwater quality regulations.

Potential pollutants generated by the Project would be typical of residential, commercial, hotel, and civic/educational land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City’s LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would 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 could conflict with or obstruct any water quality control plans for the Upper Los Angeles River Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site’s location creates a pedestrian linkage between Downtown’s Historic Core and Bunker Hill. The Project Site is currently vacant. In addition, the Project Site is bordered to the north by the historic Angels Flight, one of Downtown’s most recognized and celebrated pieces of neighborhood history. Further north of the Project Site are the Museum of Contemporary Arts, the Walt Disney Concert Hall, and the Broad Museum. The Project Site also borders Two California Plaza to the north and west, an active public open space that is part of an open space network between the Downtown skyscrapers. To the east, across Hill Street, are several restaurants and the Grand Central Market. To the south, across 4th Street are two above grade parking structures and the Metro 417 apartment building. The Project would replace the mostly landscaped and vacant lot with a new infill mixed-use project. In addition, the

Project would create numerous open space areas with the provision of gardens, courtyards, landscaped terraces, and the proposed Hill Street Plaza and Angels Terrace, all of which would be generally publicly accessible. The Project would also include a direct connection to the California Plaza and the Angels Flight stairway, which would be improved and widened as part of the Project. The Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. In addition, the Project would not permanently close any surrounding streets or access points, which could physically divide the surrounding community. The Project would link portions of Bunker Hill with the Historic Core by developing pedestrian passages and mixed-uses on the currently vacant Project Site. Therefore, the Project would not physically divide an established community. Project impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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?

Potentially Significant Impact. The Central City Community Plan (Community Plan) and the Bunker Hill Specific Plan are the primary land use plans and regulations that apply to the Project Site. The Project is consistent with these plans as described below.

The Project Site is located within the Bunker Hill portion of the Central City Community Plan. The Community Plan contain several objectives that relate to, and are consistent with, the Project, including but not limited to the following: (1) to increase the range of housing choices available to downtown employees and residents; (2) to encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism; (3) promote night life activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce pockets of activity; (4) encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs; and (5) to take advantage of the district's easy access to mass transit rail lines, the freeway system and the major boulevards that connect downtown to the region. Regarding environmental effects, the Community Plan identifies policies regarding the preservation of historic resources and cultural facilities, efficacy of transportation, and adequate public services. The Project is consistent with these and other objectives of the Community Plan.

The Project Site is also located in the Bunker Hill Specific Plan area, which states that wherever the Bunker Hill Specific Plan contains provisions which establish regulations (including but not limited to densities, heights, uses, parking, signage, open space and landscaped requirements), which are different from, more restrictive, or more permissive than would be allowed pursuant to the provisions contained in the LAMC, the Bunker Hill Specific Plan shall prevail and supersede. The permitted uses on the Project Site are consistent with the uses identified in the Specific Plan, including multi-family residential units, commercial uses, outdoor eating areas, transit stations and related facilities, and hotels. Moreover, the Project is consistent with several purposes of the Bunker Hill Specific Plan including: creating a mixed-use district with expanded housing opportunities and commercial retail to create a 24-hour downtown environments; expanding the economic base of the City by providing additional employment and revenue to the region; integrating a linked network of public open spaces and pedestrian pathways; and creating a transit-friendly environment that has active ground floor uses and pedestrian oriented design. The Project is consistent with these and other elements of the Bunker Hill Specific Plan.

Therefore, the Project would not conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Nonetheless, to provide a conservative analysis and inform the decision makers and public, the Lead Agency will provide additional analysis in the EIR regarding applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{52,53,54} As previously discussed, the Project Site is not located within the limits of an oil field according to the California Division of Oil, Gas and Geothermal Resources Well Finder System.⁵⁵ According to DOGGR, the Project Site is located approximately 0.8 mile south of the Los Angeles City Oil Field, 0.6 mile northeast of the Los Angeles Downtown Oil Field, and 0.5 mile northwest of the abandoned Union Station Oil Field. The closest known oil exploration wells are located approximately 0.5 mile north and south of the Project Site. According to DOGGR, those wells are classified as “active producer” and “dry hole,” respectively. However, as no mineral resources exist on the Project Site, the Project would not

⁵² City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁵³ City of Los Angeles General Plan Conservation Element, January 2001, Exhibit A, Mineral Resources, p. 86.

⁵⁴ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California (map), 2012.

⁵⁵ Wood Environment & Infrastructure Solutions, Inc., Report of Geotechnical Evaluation for Entitlement Documents (Geotechnical Services Phase B), Proposed Angels Landing Development, July 6, 2018, Revised March 15, 2019. See Appendix IS-3.

result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{56,57,58} As discussed above in Response to Checklist Question XII.a, the Project Site is not located within the limits of an oil field, and no producing oil wells exist on the Project Site. 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 mitigation measures are required. No further evaluation of this topic in an 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁵⁶ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁵⁷ City of Los Angeles General Plan Conservation Element, January 2001, Exhibit A, Mineral Resources, p. 86.

⁵⁸ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California (map), 2012.

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?

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, construction and operational traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in an EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. 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. No operational vibration impacts are anticipated given the potential Project uses. Therefore, further evaluation of this topic will be provided in an EIR.

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. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of an airport. The nearest airport to the Project Site is Los Angeles International Airport, which is located approximately 12 miles southwest of the Project Site. Given the distance between the Project Site and Los Angeles International 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 mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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)?

Potentially Significant Impact. The Project would result in the construction of new residential dwelling units. In addition, the Project would introduce new hotel, civic/educational, and commercial uses to the Project Site. As such, the Project would introduce residential and daytime population growth in the area. The Bunker Hill Specific Plan and Community Plan planned for growth in the downtown area, and on the Project Site. Nonetheless, considering that the Project would contain commercial and residential uses that provide new homes and businesses, the EIR will include further analysis of this issue to inform the decision makers and public. Therefore, further analysis of this topic will be included in the EIR.

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

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the Supplemental 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

Potentially Significant Impact. The City of Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services for the Project Site. The closest LAFD fire station to the Project Site is Fire Station No. 3 located at 108 North Fremont Avenue, approximately 0.9-mile northwest of the Project

Site. The Project would increase the building square footage on-site and introduce new residents, employees, and visitors to the Project Site, which could result in the need for additional LAFD services. Therefore, further analysis of this issue will be included in an EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new residential, hotel, educational/civic, and commercial uses to the Project Site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services. Therefore, further analysis of this issue will be included in an EIR.

c. Schools?

Potentially Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). As discussed in Section 3, Project Description, of this Initial Study, the Project proposes 180 residential for-sale condominium units, 261 residential apartments, two hotels with a combined total of 509 guest rooms, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. The Project would create new demand for capacity at the LAUSD schools that serve the Project Site. Therefore, further evaluation of this topic in an EIR will be provided.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks. Based on information provided by the Department of Recreation and Parks, nearby neighborhood and community parks and recreational facilities within an approximate 2-mile radius of the Project Site include, but are not limited to: Spring Street Park (0.2 mile southeast of the Project Site); Pershing Square and Park (0.2 mile southwest of the Project Site); San Julian Park (0.52 mile southeast of the Project Site); Grand Hope Park (0.75 mile southwest of the Project Site); Vista Hermosa Soccer Field (0.82 mile northwest of the Project Site); Miguel Contreras Learning Center Pool (0.83 mile northwest of the Project Site); Gladys Park (0.86 mile southeast of the Project Site); Alpine Recreation Center (1.04 miles northeast of the Project Site); Arts District Park (1.07 miles southeast of the Project Site); Echo Park Deep Pool (1.08 miles northwest of the Project Site); Rockwood Community Park (1.14 miles northwest of the Project Site); Patton Street Pocket Park (1.16 miles northwest of the Project Site); Unidad Park (1.22 miles northwest of the Project Site); Hope and Peace Park (1.53 miles west of the Project Site); MacArthur Park (1.58 miles northwest of the Project Site); Aliso-Pico Recreation Center (1.59 miles southeast of the Project Site); Pecan Recreation Center (1.60 miles east of the Project Site); Echo Park (1.63 miles northwest of the Project Site); Lake Street Community Center (1.72 miles northwest of the Project Site); and Parkview Photo Center (1.74 miles northwest of the Project Site).⁵⁹ The Department of Recreation and Parks also identified Elysian Park as a regional park located within an approximately 2-mile radius. In addition, the Department of Recreation and Parks reported that it is currently in the process of developing a park at the intersection of 1st Street and Broadway (0.32 mile northeast of the

⁵⁹ Written correspondence from Darryl Ford, Senior Management Analyst II, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks, July 13, 2018.

Project Site) and a park at the intersection of Ord Street and Yale Street (0.86 mile northeast of the Project Site).

The Quimby Act, codified in Government Code Section 66477(a)(2) was enacted in 1965 in an effort to promote the availability of park and open space areas in California and respond to the increased rate of urbanization and need for open space. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Within the City of the Los Angeles, the Quimby Act is implemented via Los Angeles Municipal Code (LAMC) Section 17.12, which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The Quimby Act permits the City to require parkland dedications not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and/or in-lieu fee payments for residential development projects.

In September 2016, the City adopted a new Park Fee Ordinance, and the Ordinance became effective January 11, 2017.⁶⁰ The aim of the Park Fee Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Park Fee Ordinance amends LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17. The Park Fee Ordinance increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees.

As discussed in Section 3, Project Description, of this Initial Study, the Project proposes 180 residential for-sale condominium units, 261 residential apartments, two hotels with a combined total of 509 guest rooms, 38,977 square feet of educational/cultural/civic uses, and 36,515 square feet of commercial space. An increase in the use of existing parks and recreational facilities is directly associated with an increase in the population. Based on a household size factor of 2.43 persons per household, development of the proposed 441 residential units would result in an increase of approximately 1,072 residents.⁶¹

As discussed in Section 3, Project Description, of this Initial Study, the Project would provide common and private open space areas and recreational amenities throughout the Project Site. Common open space would be generally publicly accessible during daytime hours in the form of plazas, gardens, courtyards, and landscaped terraces. The common open space would include approximately 56,881 square feet of exterior common area and additional interior common area. Common open space would consist of the Hill Street Plaza, Angels Terrace, Olive Street Plaza, the lower California Plaza connection, the upper California Plaza connection, and the hotel roof on Tower B. The proposed Angels Terrace would be a

⁶⁰ Ordinance No. 184505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.

⁶¹ Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2012-2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018.

primary open space amenity located at the center of the Project Site and would provide shade and seating to host a wide range of cultural events and performances. In addition, direct connections would be provided throughout the Project Site to each new open space and an improved and widened Angels Flight stairs via an overlook landing. Direct connections to the California Plaza on the northwest end of the Project Site would also be available via a large, connected, landscaped terrace. Interior common areas would include residential amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, a spa and open spaces would be included as part of the hotel. Overall, the Project's proposed open space would exceed the residential open space requirement of Section 12.21-G of the LAMC, and the Bunker Hill Specific Plan.

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 often utilize on-site open space to meet their recreational needs. While the Project's residents, visitors, and some of the new employees 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 public parks or recreational facilities given the provision of on-site open space and recreational amenities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Thus, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

Based on the above, the Project would meet the applicable requirements of the LAMC and the Bunker Hill Specific Plan regarding the provision of useable open space and the payment of fees. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. Thus, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.⁶² According to LAPL, the Project Site is served by the Richard J. Riordan Central Library (Central Library), Little Tokyo Branch Library, Chinatown Branch Library, Echo Park Branch Library, Pico Union Branch Library, and Edendale Branch Library.⁶³

The Central Library serves as the headquarters for the Los Angeles Public Library at 630 West 5th Street, approximately 0.22 mile west of the Project Site. The Central Library is approximately 538,000 square

⁶² Los Angeles Public Library, Library Directory.

⁶³ Written correspondence from Aerial Granger, Management Assistant, Business Office, Los Angeles Public Library, August 9, 2018.

feet in size and includes approximately 2.6 million volumes in collection and a staff of 390 full-time employees.⁶⁴ The Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons.⁶⁵ According to the LAPL, the Central Library exceeds the recommended building size standard of up to 20,000 square feet for a Regional Branch.

The Little Tokyo Branch Library is located at 203 South Los Angeles Street, approximately 0.35 mile east of the Project Site. The Little Tokyo Library is approximately 12,500 square feet in size and includes 66,634 volumes in collection and a staff of 10 full-time employees.⁶⁶ The Little Tokyo Library currently does not meet the standard size of 14,500 square feet for a service population of 45,000.

The Chinatown Branch Library is located at 639 North Hill Street, approximately 0.83 mile northeast of the Project Site. The library is approximately 14,500 square feet in size and includes 74,709 volumes in collection and a staff of 13.5 full-time employees. The Chinatown Branch Library currently meets the standard of 12,500 square feet for a service population of less than 45,000.

The Echo Park Branch Library is located at 1410 West Temple Street, approximately 1.16 miles northwest of the Project Site. The library is approximately 17,543 square feet in size and includes 43,689 volumes in collection and a staff of 9.5 full-time employees. The Echo Park Branch Library currently meets the standard of 14,500 square feet for a service of more than 45,000 people.

The Pico Union Branch Library is located at 1030 South Alvarado Street, approximately 1.63 miles west of the Project Site. The library is approximately 12,500 square feet in size and houses 46,562 volumes in collection and 10.5 employees. The Pico Union Branch Library currently meets the standard of 12,500 square feet for a service population of less than 45,000 people.

The Edendale Branch Library is located at 2011 West Sunset Boulevard, approximately 1.95 miles northwest of the Project Site. It is approximately 12,500 square feet in size and houses 45,651 volumes in collection. Additionally, the library has a staff of 9 full-time employees and 50 volunteers. The Edendale Branch Library currently meets the standard of 12,500 square feet for a service of less than 40,000 people.

As previously discussed, development of the proposed 441 residential units would result in an increase of 1,072 residents, which would increase the service population of the libraries serving the Project Site. The new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site and all residents would not be anticipated to travel to the same library. As provided above, four of the five branch libraries serving the Project Site currently meet library sizing standards. Only one branch library, the Little Tokyo Branch Library, currently does not meet library sizing standards for the population served. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand

⁶⁴ Written correspondence from Auriel Granger, Management Assistant, Business Office, Los Angeles Public Library, August 9, 2018.

⁶⁵ Ibid.

⁶⁶ Written correspondence from Auriel Granger, Management Assistant, Business Office, Los Angeles Public Library, August 9, 2018.

at physical library locations.^{67,68} As such, demand for library facilities would be alleviated by internet service provided throughout residential and other uses of the Project. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Library patrons also have access to podcasts, language learning programs, instructional content, and electronic editions of newspapers and magazines through smartphone applications made available to library cardholders. Furthermore, the Project would generate revenues to the City’s General Fund (in the form of property taxes, sales tax, and business tax, etc.)⁶⁹ 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 vicinity, as deemed appropriate. The Project’s revenue to the General Fund would help offset the Project-related increase in demand for library services.

Based on the above, the Project would not substantially increase the demand for library facilities and would not require the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts. Thus, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project 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?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d, while the population increase associated with the Project could generate additional demand for parks and

⁶⁷ Denise A. Troll, *How and Why Libraries are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

⁶⁸ Carol Tenopir, “Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies,” 2003.

⁶⁹ City Administrative Officer, *City of Los Angeles 2016–2017 Budget Overview*, July 2016.

recreational facilities in the vicinity of the Project Site, the Project would comply with the City’s requirements regarding the provision of open space for the number of residential units to be provided. Specifically, Section 12.21-G of the LAMC requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 52,825 square feet of open space. In addition, the Bunker Hill Specific Plan requires that a minimum 5,000 square foot pedestrian plaza be provided for projects that redevelop an entire subarea, and allows for a 50 percent reduction in the LAMC-required open space of a project. The Project would provide a total of 56,881 square feet of common open space and would exceed the requirements of the LAMC. The Project would also include a series of pedestrian plazas which would exceed the minimum pedestrian plaza size requirement. 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, employees, and visitors would often utilize on-site open space to meet their recreational needs. Additionally, as detailed above in Response to Checklist Question XV.d, the Project would meet the applicable requirements of the LAMC regarding the provision of useable open space and the payment of fees. Thus, while the Project’s residents would be expected to utilize off-site public parks 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. The impact on parks and recreational facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic 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. The Project would not necessitate or include the development of recreational facilities or require the expansion of recreational facilities which might have an adverse physical effect on the environment, as discussed above in Response to Checklist Question XV.d. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project proposes development that would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project’s residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area’s transportation facilities could conflict with a program, plan, ordinance or policy addressing the circulation system. Therefore, further analysis of this issue will be provided in an EIR.

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

Potentially Significant Impact. Metro administers the Congestion Management Program, a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The Congestion Management Program provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The Congestion Management Program for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any Congestion Management Program intersection or more than 150 trips to a Congestion Management Program mainline freeway location in either direction during either the a.m. or p.m. weekday peak hours. Implementation of the Project would generate additional vehicle trips, which could potentially add more than 50 trips to a Congestion Management Program roadway intersection or more than 150 trips to a Congestion Management Program freeway segment. Therefore, further analysis of this issue will be provided in an EIR.

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

Potentially Significant Impact. As previously discussed, the Project proposes the development of residential, hotel, and commercial uses within an existing undeveloped site. While the Project would not introduce incompatible uses to the Project Site or surrounding area, given the existing design of the roads surrounding the Project Site, particularly the slope of 4th Street from which vehicles will enter and exit the

Project Site, the Project could require the implementation of specific design features to ensure adequate sight distances from proposed driveways. Therefore, further evaluation of this topic in an EIR is required.

d. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily occur within the Project Site, construction activities could potentially require the partial closure of travel lanes on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. Therefore, further analysis of this issue in an EIR is required.

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

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

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

Potentially Significant Impacts. Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, Assembly Bill 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in Assembly Bill 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As discussed in Section 3, Project Description, of this Initial Study, below grade parking would extend to a maximum depth of 110 feet to 170 feet. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with Assembly Bill 52, the City notified all applicable tribes on July 12, 2018, and the City will participate in any requested consultations for the Project. Further analysis of this topic 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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?

Potentially Significant Impact. Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand and wastewater generation, further analysis of this issue in an EIR will be provided.

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, the Project would not require or result in the relocation or construction of new or expanded storm water drainage facilities.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has the potential to result in an increased demand for water provided by LADWP. Therefore, further analysis of this issue in an EIR will be provided to determine the sufficiency of water supply.

c. 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?

Potentially Significant Impact. See Response to Checklist Question XIX.a, above.

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?

Less Than Significant Impact.

The following analysis quantifies the Project's construction and operation solid waste generation.

While the City's Bureau of Sanitation (also known as LA Sanitation) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills.⁷⁰ Ten Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.⁷¹ In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery. Of the ten Class III landfills within the County, four landfills are open to the City of Los Angeles. These include Antelope Valley, Chiquita Canyon, Lancaster, and Sunshine Canyon landfills. Based on the County's Integrated Waste Management Plan 2016 Annual Report, these landfills open to the City had a combined total remaining capacity of 85.45 million tons as of December 31, 2016.

⁷⁰ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁷¹ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

In 2018, the City of Los Angeles disposed of approximately 1.8 million tons of solid waste at the County's Class III landfills and approximately 10,863 tons at transformation facilities.^{72,73} The 1.8 million tons of solid waste accounts for approximately 2.1 percent of the total remaining capacity (85.45 million tons) for the County's Class III landfills open to the City as of December 31, 2016.^{74,75} The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity and an average daily in-County disposal rate of 897 tons per day.⁷⁶

Construction

The Project is proposed on a site that is predominately landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 2 on page 97, after accounting for mandatory recycling, the Project would result in approximately 647 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 56.34 million tons, as well as the remaining 85.45 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.⁷⁷

Operation

As shown in Table 3 on page 98, upon full buildout, the Project would generate approximately 2,870 tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards of waste or more per week, and multi-family housing with five or more units, to adopt recycling

⁷² County of Los Angeles, Department of Public Works, Solid Waste Information Management System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2018 to December 2018).

⁷³ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

⁷⁴ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

⁷⁵ $(1.8 \text{ million tons} \div 85.45 \text{ million tons}) \times 100 = \text{approximately } 2.10 \text{ percent.}$

⁷⁶ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

⁷⁷ The Class III landfills open to the City of Los Angeles include Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. While the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003. As the Project Site is not within this service area, the Calabasas Landfill was excluded from the remaining disposal capacity amount. This amount also does not reflect the estimated remaining disposal capacity/expansion of the Chiquita Canyon Landfill.

**Table 2
Project Demolition and Construction Waste Generation**

Land Use	Size	Generation Rate (lbs/sf) ^{a,b}	Total (tons) ^b
Demolition Waste			
Landscaping	97,631 sf	N/A	0
Construction Waste			
Residential–Condominiums (180 units)	436,195 sf	4.38	955
Residential–Apartments (261 units)	333,910 sf	4.38	731
Hotel (509 rooms)	423,553 sf	3.89	824
Educational/Cultural/Civic	38,977 sf	3.89	76
Commercial (Retail/Restaurant)	36,515 sf	3.89	71
Total Construction and Demolition Waste			2,586
Total Waste (after 75-percent recycling)			647
<hr/> <i>du = dwelling unit</i> <i>lb = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3 and Table 4. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> ^b Used conversion of 1 pound = 0.0005 tons. Numbers have been rounded. Source: Eyestone Environmental, 2019.			

practices. Likewise, the analysis does not include implementation of the City’s recycLA waste collection and hauling franchise system, which implement Citywide landfill diversion and recycling goals.⁷⁸

The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.16 percent of the City’s annual solid waste disposal⁷⁹ and approximately 0.003 percent of the remaining capacity for the County’s Class III landfills open to the City of Los Angeles (85.45 million tons).⁸⁰

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are

⁷⁸ The recycLA program divides the City into 11 service zones and designates a single trash hauler for each zone. Source: LASAN, recycLA, Your Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf/s-lsh-wwd-s-zwlaf-yp?_adf.ctrl-state=f7qpamfoi_5&_afLoop=5591401097448021#!, accessed June 11, 2018.

⁷⁹ (2,870 tons per year ÷ 1.8 million tons per year) × 100 = approximately 0.16%

⁸⁰ (2,870 tons per year ÷ 85.45 million tons per year) × 100 = approximately 0.003%

**Table 3
Estimated Project Solid Waste Generation**

Land Use	Size	Employee Generation Rate ^a	Estimated No. of Employees	Solid Waste Generation Rate ^b	Total Generation (tons/year)
Existing					
Landscaping ^c	97,631 sf	N/A	N/A	N/A	0
<i>Total Existing</i>					0
Proposed					
Residential—Condominiums	180 du	N/A	N/A	2.23 tons/du/yr	402
Residential—Apartments	261 du	N/A	N/A	2.23 tons/du/yr	583
Hotel	423,553 sf	0.00113 emp/sf	462	3.03 tons/emp/yr	1,452
Educational/Cultural/Civic ^d	38,977 sf	0.00113 emp/sf	45	3.03 tons/emp/yr	137
Commercial (Retail/Restaurant)	36,515 sf	0.00271 emp/sf	98	2.98 tons/emp/yr	296
<i>Total with Implementation of Project</i>					2,870
Total Net Increase					2,870
<p><i>sf = square feet</i> <i>du = dwelling units</i> <i>emp = employee</i></p> <p>^a Employee generation rates are from Los Angeles Unified School District 2016 Developer Fee Justification Study, March 2017, Table 14.</p> <p>^b Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.</p> <p>^c As the existing setting is not occupied by development, solid waste generation is not considered.</p> <p>^d The solid waste generation rate for an education use would be 0.50 tons/emp/yr. As such, for conservative purposes, utilized the more conservative hotel rate for the proposed educational/cultural/civic space.</p> <p>Source: Eyestone Environmental, 2019.</p>					

addressed in part by determining the available landfill capacity.⁸¹ Based on the most recent 2016 CoIWMP Annual Report, the remaining total disposal capacity for the County’s Class III landfills is estimated at 103.18 million tons.⁸²

Based on the 2016 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will exceed the 2016 remaining permitted Class III landfill capacity of

⁸¹ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

⁸² The 2016 CoIWMP Annual Report did not account for the estimated remaining permitted capacity of the Chiquita Canyon Landfill, which was reported as of December 31, 2016. At the time, the Chiquita Canyon Landfill’s Conditional Use Permit for increased disposal capacity and expansion had not yet been approved. As such, the capacity of 103.18 million tons does not include capacity from the Chiquita Canyon Landfill Expansion, which was approved by the County of Los Angeles Board of Supervisors in June 2017 as an the expansion of the landfill for 30 years or 60 million tons, whichever occurs first. In addition, the Chiquita Canyon Landfill was also approved for the capacity to receive inert waste.

103.18 million tons. The 2016 ColWMP Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The 2016 ColWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2025. In accordance with the Sustainable City pLAn, introduced by Mayor Garcetti in 2015, the City is also working toward a landfill diversion rate of at least 95 percent by 2035. With a currently waste diversion rate of 76.4 percent from landfills,⁸³ the City has been implementing the recycLA program, a franchise system for municipal solid waste collection and handling, as well as a number of programs related to organic waste recycling, composting, anaerobic digestion, construction and demolition debris recycling.⁸⁴

The County will continue to address landfill capacity through the preparation of Countywide Integrated Waste Management Plan annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2016 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2016 Annual Report to adequately meet countywide disposal needs through 2031 without capacity shortages.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (Assembly Bill 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. Assembly Bill 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,

⁸³ LASAN. Recycling, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-r?_adf.ctrl-state=15ly2eezvj_5&_afLoop=5583543953701852#!, accessed June 11, 2018.

⁸⁴ City of Los Angeles, Sustainable City pLAn.

Assembly Bill 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.

Senate Bill 1374 requires jurisdictions to include in Assembly Bill 939 annual reporting a summary of the progress made in diverting construction and demolition waste. The legislation also required California Department of Resources Recycling and Recovery (CalRecycle) to adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills. Furthermore, Assembly Bill 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 Assembly Bill 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand 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. The plan's "zero waste" goal is to reduce, reuse, recycle, or convert waste to energy to achieve an overall diversion level of 90 percent or more by 2025. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. The Sustainable City pLAn, introduced by Mayor Garcetti in 2015, furthers this goal by targeting a landfill diversion of at least 95 percent by 2035. As the City's exclusive franchise system for municipal solid waste collection and handling, the recycLA program also mandates maximum annual disposal levels and specific diversion requirements for each franchise zone to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. Moreover, Assembly Bill 1826 supports zero waste goals by requiring businesses that generate specific amounts of organic waste per week to arrange for organic waste recycling service.⁸⁵ As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Full implementation of Assembly Bill 1826 is anticipated to begin on January 1, 2019.

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.⁸⁶ The Project would also comply with Assembly Bill 939, Assembly Bill 341, Assembly Bill 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. 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 the EIR is required.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

⁸⁵ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

⁸⁶ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

No Impact. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 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. Project excavation to depths of 110 feet to 170 feet below grade could encounter resources associated with important examples of history or prehistory. If such resources were encountered, then the resources would be handled according to applicable regulatory requirements, and site-specific recommendations in archeological, paleontological, or tribal resource reports, if any, prepared in conjunction with an EIR. Therefore, further evaluation of this topic in an EIR is required.

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. Located within the vicinity of the Project Site are other past, current, and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may have cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; paleontological resources; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection, police protection, and schools); transportation/traffic; tribal cultural resources; and utilities (wastewater and water supply).

Regarding cumulative aesthetics impacts, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Related projects are also subject to the City’s design review process and review for consistency with zoning and regulatory documents governing scenic quality. Furthermore, in any case, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project’s aesthetics impacts cannot be considered significant. Given the Project Site’s location in a transit priority area, other residential, mixed-use, and employment center development projects located in the vicinity of the Project Site are of similar aesthetic character and would thus not have incremental combined effects that could create a cumulatively considerable impact. Thus, cumulative impacts associated with aesthetics would be less than significant.

With regard to cumulative effects on agriculture/forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts on these resources would be less than significant.

With regard to the cumulative effects on geology and soils, the Project’s impacts are less than significant, and the Los Angeles Downtown area is built out and potentially related projects are subject to compliance with the California Building Code and review by the City’s Department of Building and Safety to ensure potential impacts related to geology and soil are not significant. In addition, there are no related projects proposed adjacent to the Project Site that could incrementally increase the risk or potential adverse effects of the Project on geology and soils. Therefore, impacts would not be cumulatively considerable and are less than significant regarding landslides, soil erosion/loss of topsoil, unstable geologic units, or expansive soils.

With regard to cumulative effects of hazards and hazardous materials, the presence of these materials are generally site specific and are evaluated within the context of each individual project. The Phase I and Phase II assessed sites around the Project Site, in addition to on-site conditions, that could have the potential to impact conditions on the Project Site and determined that hazardous materials impacts would be less than significant. In addition, since the area around the Project Site is developed with mostly office, commercial, and residential uses, which do not involve the routine use or transport of hazardous materials beyond those already that are commonly used (e.g., cleaning agents and paint thinners), there

is not a likelihood of combined hazardous material impacts. And, there are no hazardous material facilities in proximity to the Project Site that could have incremental adverse impacts. Furthermore, projects would be required to comply with existing regulatory requirements regarding the storage, handling and disposal of hazardous materials. Finally, in terms of hazardous sites, EnviroStor shows that there are no identified federal superfund or State response sites within the vicinity of the Project Site. Therefore, impacts would not be cumulatively considerable, and impacts would be less than significant.

With regard to cumulative effects of hydrology and water quality, due to the highly urbanized nature of the Downtown area, there are no streams or rivers, FEMA flood hazard areas or other existing hydrological features that could be physically altered such that there would be substantial erosion, siltation or flooding. In terms of runoff, all projects would be required at minimum to create stormwater mitigation plans and/or comply with the City's LID ordinance, thereby minimizing the potential for polluted runoff. In terms of groundwater, USGS maps indicate that there are no active wells nearby, or wells that are below normal groundwater levels. Nevertheless, all projects would comply with standard construction practices should dewatering be required. Therefore, it is unlikely that the projects would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level. Cumulative impacts on hydrology and water quality would not be cumulatively considerable, and would be less than significant.

With regard to public services and recreation cumulative development could increase the demand for these services and facilities. Projects are required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. In addition, in the case of recreation (i.e., existing neighborhood and regional parks), projects would be required to provide amenity space (e.g. gyms, outdoor decks with pools, etc.) that would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Therefore, cumulative impacts would not be cumulatively considerable, and impacts would be less than significant.

With regard to cumulative effects on solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that related projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Also, the demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan annual reports, which consider the overall capacity needs for solid waste service throughout the region. Each annual Countywide Integrated Waste Management Plan report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2016 Countywide Integrated Waste Management Plan Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2031). Therefore, cumulative impacts with respect to solid waste would not be cumulatively considerable, and would be less than significant.

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 topics: air quality; cultural resources; energy; paleontological resources; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection, police protection, and schools); transportation/traffic; tribal cultural resources; and utilities (wastewater and water supply). As a result, these potential effects will be analyzed further in the EIR.