City of Los Angeles
Department of City Planning • Environmental Analysis Section
City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY

WILSHIRE COMMUNITY PLAN AREA

333 La Cienega Boulevard Project

Case Number: ENV-2015-897-EIR

Project Location: 333 La Cienega Boulevard, Los Angeles, California, 90048
Council District: 05 – Paul Koretz

Project Description: CRM Properties, the Applicant, proposes to develop a mixed-use, 20-story building (proposed project) consisting of 145 residential units and 31,055 square feet (sf) of commercial uses, including 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses in the City of Los Angeles (City). The project site is located at 333 La Cienega Boulevard on an approximately 1.15 acre site. Located in the western portion of the City, the project site is approximately 0.24 miles south of the City of West Hollywood and 0.38 miles east of the City of Beverly Hills. The proposed project would replace the existing commercial uses on the project site, which include a three-story building, with a ground floor single tenant retail store and three levels of garage parking (two levels and roof). The proposed project would provide 362 parking spaces, including 119 parking spaces for commercial uses in a two level subterranean parking garage and 243 parking spaces for residential uses, in an above-ground covered garage on Levels 2 through 4.

Requested Approvals: The project would require a zone change from C2-1VL-O to C2-2-O to change the Height District 1VL to Height District 2, to allow construction of a 240-foot building, a Site Plan Review pursuant to LAMC Section 16.05 for a residential development that is greater than 50 dwelling units, a General Plan Amendment to change the land use designation from Neighborhood Office Commercial to Regional Commercial, and a permit for and any additional actions as may be deemed necessary.

APPLICANT:	PREPARED BY:	ON BEHALF OF:
CRM Properties 101 The Grove Drive Los Angeles, CA 90036	Environmental Science Associates 626 Wilshire Boulevard, Suite 1100 Los Angeles, CA	City of Los Angeles Department of City Planning Environmental Analysis Section

January 2016

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 350, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	5	January 25, 2016

RESPONSIBLE AGENCIES

PROJECT TITLE/NO.	CASE NO.
333 La Cienega Boulevard Project	ENV-2015-897-EIR

PREVIOUS ACTIONS CASE NO.	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.

PROJECT DESCRIPTION

CRM Properties, the Applicant, proposes to develop a mixed-use, 20-story building (proposed project) consisting of 145 residential units and 30,276 square feet (sf) of commercial uses, including 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses on an approximately 1.15-acre site in the City of Los Angeles (City). The project site is located at 333 La Cienega Boulevard in the western portion of the City, approximately 0.24 miles south of the City of West Hollywood and 0.38 miles east of the City of Beverly Hills. Upon completion of the proposed project, the new 293,296 sf structure would be approximately 240 feet in height and would consist of a ground level containing a lobby space and commercial uses, 14 levels of residential units, one penthouse level, and one level with amenities, which include a pool, club, spa and lounge. Approximately 19,884 sf of usable common and private open space areas would be provided. Ground-level common open space would include up to two water features such as a fountain, pedestrian walkways, outdoor dining area, sitting areas, hardscape and patio areas, and a raised planter area as a part of the main entrance plaza. The proposed project would provide 362 parking spaces, including 119 parking spaces for commercial uses in a two level subterranean parking garage and 243 parking spaces for residential uses, in an above-ground covered garage on Levels 2 through 4.

ENVIRONMENTAL SETTING

The project site is comprised of two contiguous legal parcels, and is situated on an irregularly shaped site that is currently occupied by a three-story commercial-retail building, with a ground floor single tenant retail store and three levels of garage parking (levels 2, 3, and the roof). The project site is located in a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of commercial, retail, institutional, and residential uses. The Westbury Terrace condominium tower and Our Lady of Mount Lebanon-St. Peter Cathedral are located to the west of the project site, directly across San Vicente Boulevard. Immediately north, at the northeast corner of 3rd Street and La Cienega Boulevard, within the same block is a single-story strip mall commercial center containing restaurant and retail uses. The Beverly Center and Cedars-Sinai Medical Center are located across 3rd Street to the north and northwest, respectively. Across La Cienega Boulevard to the east are one and two-story commercial/retail centers, with single-family residential uses east of those commercial/retail centers. A mixed-use residential/retail building lies directly to the south across Burton Way, with multi-family residential uses south of Burton Way and west of Le Doux Road, to the south of the project site.

PROJECT LOCATION

333 La Cienega Boulevard, Los Angeles, CA 90048

PLANNING DISTRICT		**STATUS:**
Wilshire		☐ **PRELIMINARY** ☐ **PROPOSED** _____ _____ _____ ☒ **ADOPTED**
EXISTING ZONING	**MAX. DENSITY ZONING**	
C2-1VL-O	126 dwelling units and 75,324 square feet of floor area per existing Neighborhood Commercial land use designation and C2-1VL-O zoning.	☐ **DOES CONFORM TO PLAN**
GENERAL PLAN LAND USE & ZONE(S)	**MAX. DENSITY PLAN**	
Regional Commercial/C2-2-O	251 dwelling units and 301,296 square feet of floor area per proposed Regional Center Commercial land use designation and C2-2-O zoning.	☐ **DOES NOT CONFORM TO PLAN**
SURROUNDING LAND USES	**PROJECT DENSITY**	
Commercial, retail, institutional, and residential.	145 residential units; 30,276 square feet commercial. Please refer to Attachment A.	☐ **NO DISTRICT PLAN**

☞ ☐ DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Alejandro Huerta — Planning Assistant

SIGNATURE — TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

    2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

The topic of noise will be further evaluated in the EIR. In addition, while the following topics have not been identified as potentially significant since they are not expected to result in a significant impact, they will be evaluated in the EIR, as described further in Attachment B. These topics are: aesthetics, land use/planning, and transportation and circulation.

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

☐ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
CRM Properties	(323)900-8100
PROPONENT ADDRESS	
101 The Grove Dr. Los Angeles, CA 90036	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles, Department of City Planning	November 13, 2015
PROPOSAL NAME (If Applicable)	
333 La Cienega Boulevard Project	

ENVIRONMENTAL IMPACTS

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

		Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
I.	**AESTHETICS — Would the project:**				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐
II.	**AGRICULTURAL AND FOREST RESOURCES —** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. **Would the project:**				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES — 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
V. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	☐	☒	☐	☐
VI. GEOLOGY, SOILS, AND SEISMICITY — Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit 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?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
VII. GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
IX. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND LAND USE PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
XI. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
XII. NOISE — Would the project:				
a) Result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Result in exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) Result in A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) Result in A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING — Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)			
	Potentially Significant Impact	***Less Than Significant with Mitigation Incorporation***	***Less Than Significant Impact***	***No Impact***
XIV. PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of, or the 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 following public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐
XV. RECREATION — Would the project:				
a) 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?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐
XVI. TRANSPORTATION AND TRAFFIC — Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

e)	Result in inadequate emergency access?	☐	☐	☒	☐
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

XVII. UTILITIES AND SERVICE SYSTEMS — Would the project:

a)	Conflict with wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c)	Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e)	Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
h)	Other utilities and service systems?	☐	☐	☒	☐

XVIII. ENERGY RESOURCES — Would the project:

a)	Conflict with an adopted energy conservation plan?	☐	☐	☒	☐
b)	Use non-renewable resources in a wasteful or inefficient manner?	☐	☐	☒	☐

XIX. MANDATORY FINDINGS OF SIGNIFICANCE Would the project:

a)	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b)	Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐

c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

PREPARED BY	TITLE	TELEPHONE #	DATE
Kimberly Comacho ESA 626 Wilshire Boulevard Suite 1100 Los Angeles, CA 90017	Senior Associate	213-542-6042	January 2015

ATTACHMENT A
Project Description

A. Introduction

CRM Properties, the Applicant, proposes to develop a 1.15 acre site with a mixed-use, 20-story building (proposed project) with a total floor area of 294,294 square feet (sf) consisting of 145 residential units and 31,055 sf of commercial uses: 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses. The proposed structure would be approximately 240 feet in height and would include a ground level with 3,923 sf of residential lobby space and 22,436 sf commercial (retail and/or restaurant) space; a mezzanine level with 8,619 sf of commercial (retail and/or restaurant) uses and 3,516 sf of residential lobby space; 145 residential units (Levels 5 through 19); and one level with amenities such as a pool, gym, spa, and lounge (Level 20). There would be approximately 26,862 sf of usable common and private open space. The proposed project would provide 362 parking spaces including 119 parking spaces for commercial uses in a two level subterranean parking garage, 217 parking spaces for residential uses, in an above-ground covered garage on Levels 2 through 4, and 25 spaces reserved for use by the mixed-use development at 8500 Burton Way as required by Condition No. 11 in Ordinance 180766.[1]

B. Project Location

As shown in **Figure A-1**, the project site is located at 333 La Cienega Boulevard on an approximately 1.15-acre site in the Wilshire Community Plan Area of the City of Los Angeles. Located in the western portion of the City, the project site is approximately 0.24 mile south of the City of West Hollywood and 0.38 mile east of the City of Beverly Hills. Primary regional access is provided by the Santa Monica Freeway (I-10), which runs east-west approximately 2 miles to the south of the project site, the Hollywood Freeway (U.S. 101), which runs north-south approximately 4 miles east of the project site, and the San Diego Freeway (I-405), which runs north-south approximately 4 miles west of the project site. Major arterials providing regional and sub-regional access to the project vicinity include Wilshire Boulevard approximately 0.50 mile to the south, La Cienega Boulevard to the immediate east, San Vicente Boulevard to the immediate west and south, 3rd Street to the north, and Robertson Boulevard approximately 0.40 mile to the west.

[1] Condition No. 11 requires 25 spaces for employee parking within 500 feet of 8500 Burton Way development. To the extent this parking is not provided on the project site, the 25 spaces would be allocated for residential uses.

C. Surrounding Uses and Project Site Conditions

The project site is located in a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, institutional, and residential, as shown on **Figure A-1** and described below**:**

- **North:** Immediately north, within the same block as the project site, is a single story strip mall commercial center containing restaurant and retail uses. The Beverly Connection, Beverly Center, and Cedars-Sinai Medical Center are located across 3rd Street to the northeast, north, and northwest, respectively. All three are designated regional centers.[2]
- **East:** Across La Cienega Boulevard to the east are one and two-story commercial/retail uses, with residential uses east of the commercial/retail centers.
- **South:** A mixed-use residential/retail building, 8500 Burton Way, lies directly to the south across Burton Way, with residential uses south of Burton Way and west of Le Doux Road.
- **West:** The Westbury Terrace condominium tower and Our Lady of Mount Lebanon-St. Peter Cathedral are to the west directly across San Vicente Boulevard.

The project site, which is comprised of two contiguous legal parcels, is situated on an irregularly shaped site that is currently occupied by a three-story commercial building. A single-tenant discount department store (formerly Loehmann's) occupies the ground level, and a parking garage occupies the three levels (levels 2, 3, and the roof) above the retail space.[3] There is limited landscaping within and surrounding the project site, including some scattered street trees and shrubs along La Cienega Boulevard and San Vicente Boulevard. Existing electrical poles, street lights, and 20 street trees are situated along the sidewalks surrounding the project site.[4] **Figure A-2**, shows the existing conditions of the project site.

2 City of Los Angeles, *Wilshire Community Plan*, http://planning.lacity.org/complan/pdf/wilcptxt.pdf, 2001, accessed December 16, 2015.

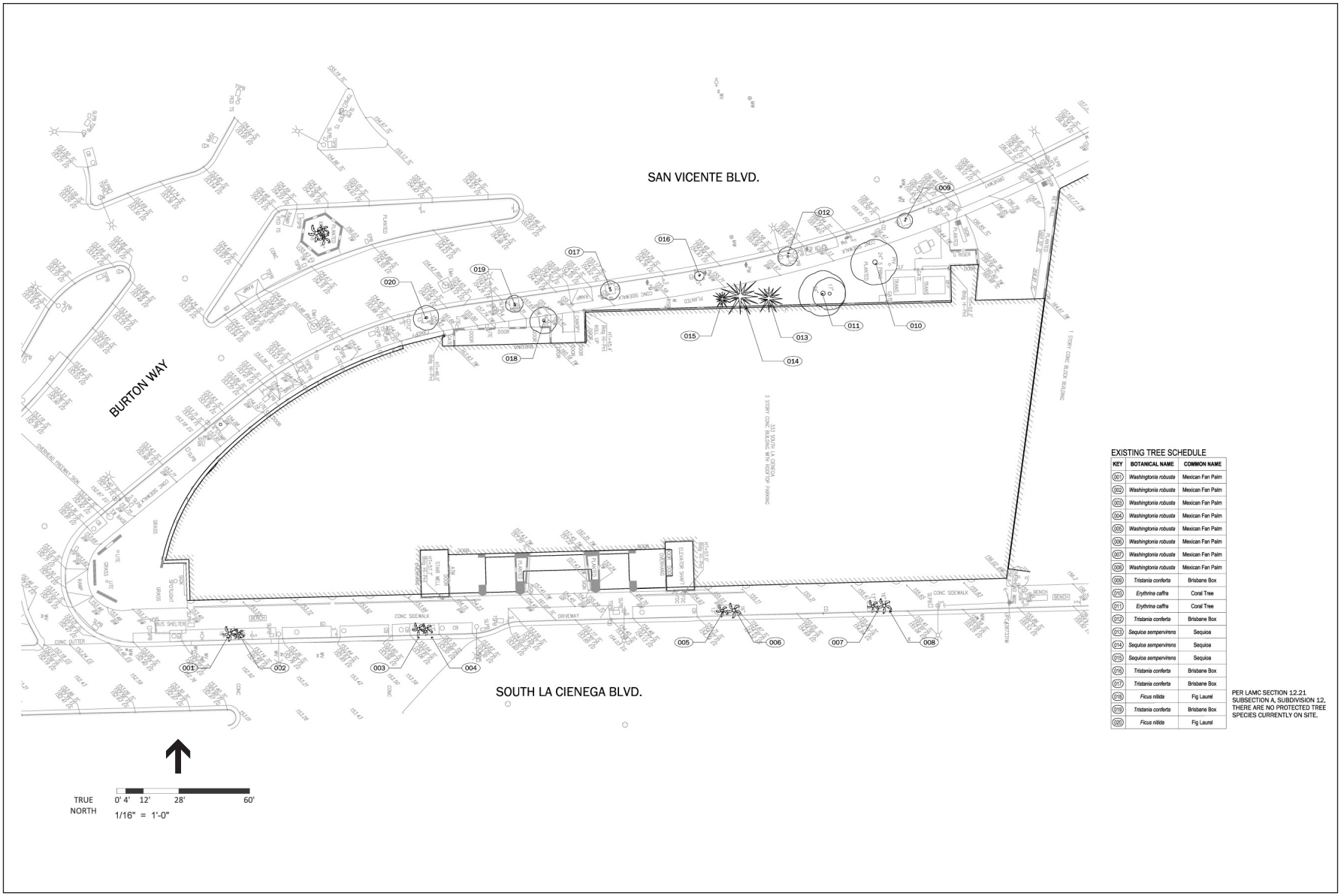
3 The single-tenant discount department store in the existing building is currently vacant, while the parking garage continues to operate.

4 An illustration of the location and species and the existing 20 trees are provided in Section 3.4, Biological Resources of this document.

SOURCE: ESA, 2015

333 La Cienega Blvd . 140525

Figure A-1
Project Location



EXISTING TREE SCHEDULE

KEY	BOTANICAL NAME	COMMON NAME
001	*Washingtonia robusta*	Mexican Fan Palm
002	*Washingtonia robusta*	Mexican Fan Palm
003	*Washingtonia robusta*	Mexican Fan Palm
004	*Washingtonia robusta*	Mexican Fan Palm
005	*Washingtonia robusta*	Mexican Fan Palm
006	*Washingtonia robusta*	Mexican Fan Palm
007	*Washingtonia robusta*	Mexican Fan Palm
008	*Washingtonia robusta*	Mexican Fan Palm
009	*Tristania conferta*	Brisbane Box
010	*Erythrina caffra*	Coral Tree
011	*Erythrina caffra*	Coral Tree
012	*Tristania conferta*	Brisbane Box
013	*Sequioa sempervirens*	Sequioa
014	*Sequioa sempervirens*	Sequioa
015	*Sequioa sempervirens*	Sequioa
016	*Tristania conferta*	Brisbane Box
017	*Tristania conferta*	Brisbane Box
018	*Ficus nitida*	Fig Laurel
019	*Tristania conferta*	Brisbane Box
020	*Ficus nitida*	Fig Laurel

PER LAMC SECTION 12.21 SUBSECTION A, SUBDIVISION 12. THERE ARE NO PROTECTED TREE SPECIES CURRENTLY ON SITE.

SOURCE: Caruso Affiliated 2015

333 La Cienega Blvd . 140525

Figure A-2
Existing Site Plan

D. Land Use and Zoning

The project site is within the planning boundary of the Wilshire Community Plan Area (CPA) and has a land use designation of Neighborhood Office Commercial.[5] The project site is adjacent to the southern border of an area designated as the Beverly Center-Cedars Sinai Regional Commercial Center. This area contains high-rise medical and office buildings, hotels, apartment towers, entertainment centers, and regional shopping complexes. In addition to commercial uses, the Wilshire CPA promotes the development of new housing to meet the diverse economic and physical needs of the existing and projected residential population.[6]

The project site has a zoning designation of C2-1VL-O (Neighborhood Office Commercial, Height District 1VL, Oil Drilling District). Uses permitted within the C2 zone include, but are not limited to, retail stores or repair shops, restaurants or cafes, amusement enterprises, residential uses (that must comply with requirements of the R4 Zone, Section 12.11, C.2 and 3), uses permitted in C1.5 Limited Commercial Zones, including retail and specialty stores, hotels and residential uses. Height District 1VL permits buildings up to a height of 45 feet.

E. Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project." Additionally, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." As set forth by the CEQA Guidelines, the objectives for the proposed project are as follows:

- Develop an underutilized site with an aesthetically pleasing and well-designed mixed-use housing and retail development that is distinctive and complementary to the community's character, including the regional Beverly Center, surrounding commercial uses, and the mixed-use residential tower located at 8500 Burton Way.
- Provide a high quality, mixed-use residential project adjacent to major public transportation lines including the Metro Purple Line station at Wilshire Boulevard and La Cienega Boulevard (expected 2023) and existing Metro Local bus lines, a Los Angeles Department of Transportation DASH route, and an Antelope Valley bus line.
- Include new ground level open space and water features that will enhance the visual aesthetic of the neighborhood.
- Encourage pedestrian activity to activate the public realm by enhancing the streetscape with walkability and safety improvements, landscaping, and visually stimulating architecture.
- Provide housing opportunities in an urban setting in close proximity to employment, goods, and services thereby reducing traffic and air quality impacts.

5 City of Los Angeles, *ZIMAS search: 333 La Cienega Boulevard*, http://zimas.lacity.org/, 2015, accessed December 17, 2015.

6 City of Los Angeles, *Wilshire Community Plan*, page III-2, http://planning.lacity.org/complan/pdf/wilcptxt.pdf, 2001, accessed December 17, 2015.

- Locate development of high-density residential and retail uses on a site near compatible uses, such as the 8500 Burton Way mixed-use residential tower to the south and the Westbury Terraces condominium tower to the west.
- Include retail that provides goods and services needed in the community and is convenient to both pedestrians and vehicles.
- Create open space and recreational opportunities for residents and their guests through the provision of plazas, fitness center, swimming pool and spa, and common rooms.
- Minimize impacts to the environment by using sustainable building practices and water energy saving design principles.

F. Project Characteristics

1. Project Overview and Design

The proposed project would replace the existing commercial uses on the project site with a new mixed-use, 20-story building consisting of 145 residential units and 31,055 sf of commercial uses, including 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses. The new 294,294 sf structure would be approximately 240 feet in height and provide a 6:1 floor to area ratio (FAR). The proposed project would require a zone change from C2-1VL-O to C2-2-O to change the Height District from 1VL to Height District 2 to allow for the construction of a 240-foot building, and a General Plan Amendment (GPA) to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial which would allow for the proposed height, density, and floor area of the new structure.

The proposed structure would contain two subterranean levels with a depth of at least 19 feet, which would include parking and storage areas; a ground level containing a residential amenity lobby and space for two commercial tenants; a mezzanine level with more commercial space and lobby amenities; three levels of above-ground parking (Levels 2 through 4), 145 residential units (Levels 5 through 19); and a level that includes common area amenities such as a pool, spa, fitness club, and lounge (Level 20); and a mechanical/elevator penthouse rooftop level. The proposed floor plans are contained in **Figure A-3** through **Figure A-12**.

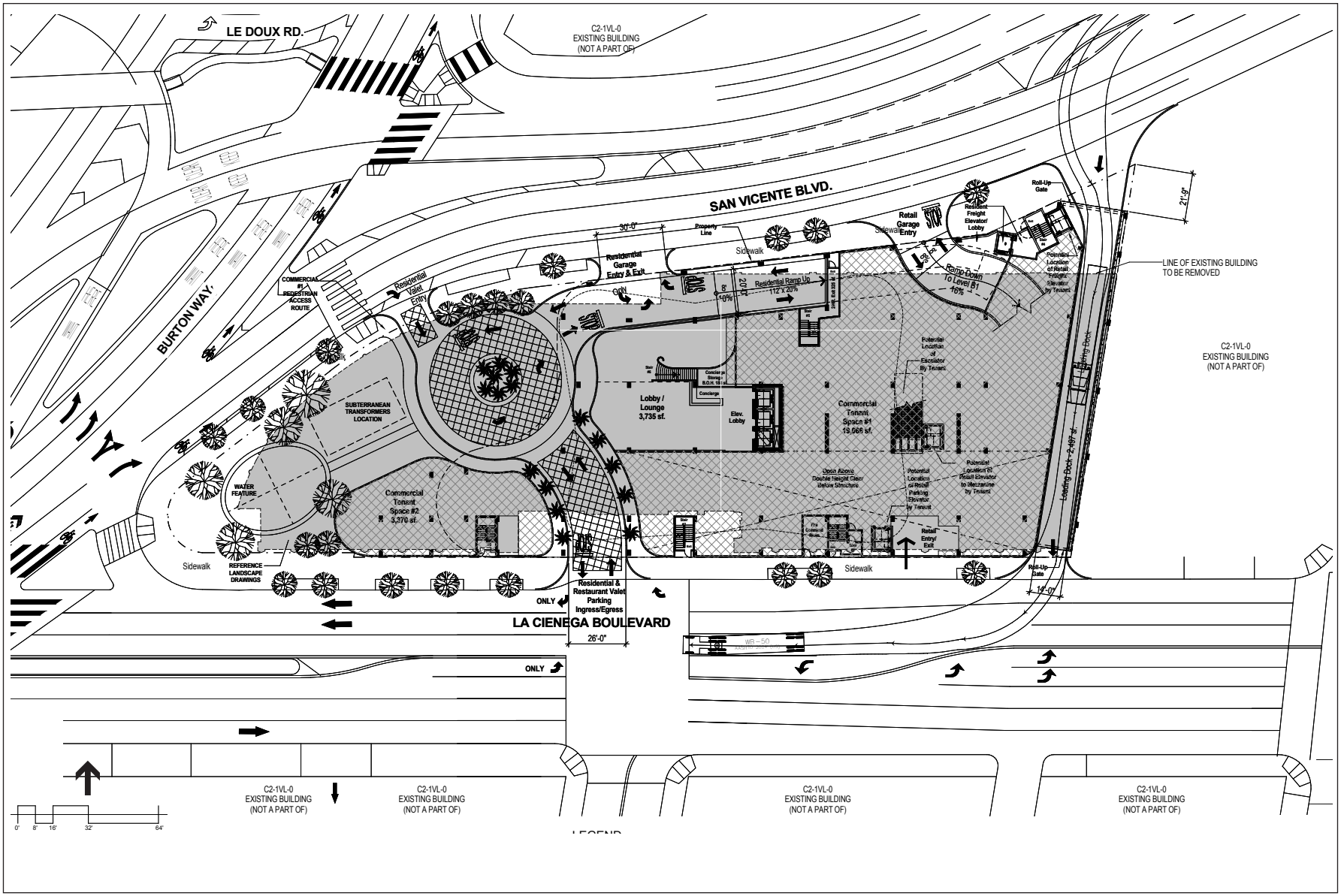
The proposed project would be designed in a contemporary architectural style, consistent with the style of the buildings north and south of the project site. As shown in **Figure A-14**, the new building would be designed as a tower over a podium base. The ground floor and mezzanine levels would consist of landscaping along the southern boundary of the site, driveway access to the building, a lobby, common areas, and commercial and retail uses that occupy the base of the podium. The remaining levels of the podium base would consist of parking levels on floors 2 through 4. There would be no setbacks provided as a part of the proposed project so the podium base and landscaped areas would occupy the entire parcel. The tower portion of the building would contain 15 levels (5 through 19) of residential units (including penthouse units on level 19) and one level containing common area amenities (level 20). Above this there would be a mechanical/elevator penthouse rooftop level. The majority of the building façade would consist of modern floor lines with sweeping expanses of glass and precast concrete undulating balconies

that twist and offset as the tower rises above the podium. Other building materials would include stone, glass, metal, and smooth formed concrete. All glass building materials would be non-reflective or treated with a non-reflective coating in order to minimize glare. In addition to the new structure, a ground level plaza would be provided in the southern portion of the project site. The plaza would consist of a water fountain, pedestrian paths, and landscaped areas and would provide a "front door" to the commercial frontage and residential lobby, as illustrated by **Figure A-14.** Building elevations, representing the west and east elevations, are provided by **Figure A-15** and **Figure A-16**.

The proposed project would connect to the existing utility infrastructure provided in La Cienega Boulevard, including water mains, sewer lines, storm drain inlets, and electrical and gas lines. All major utilities would be placed underground and could require offsite improvements in the adjacent rights-of-way.

2. Landscaping and Open Space

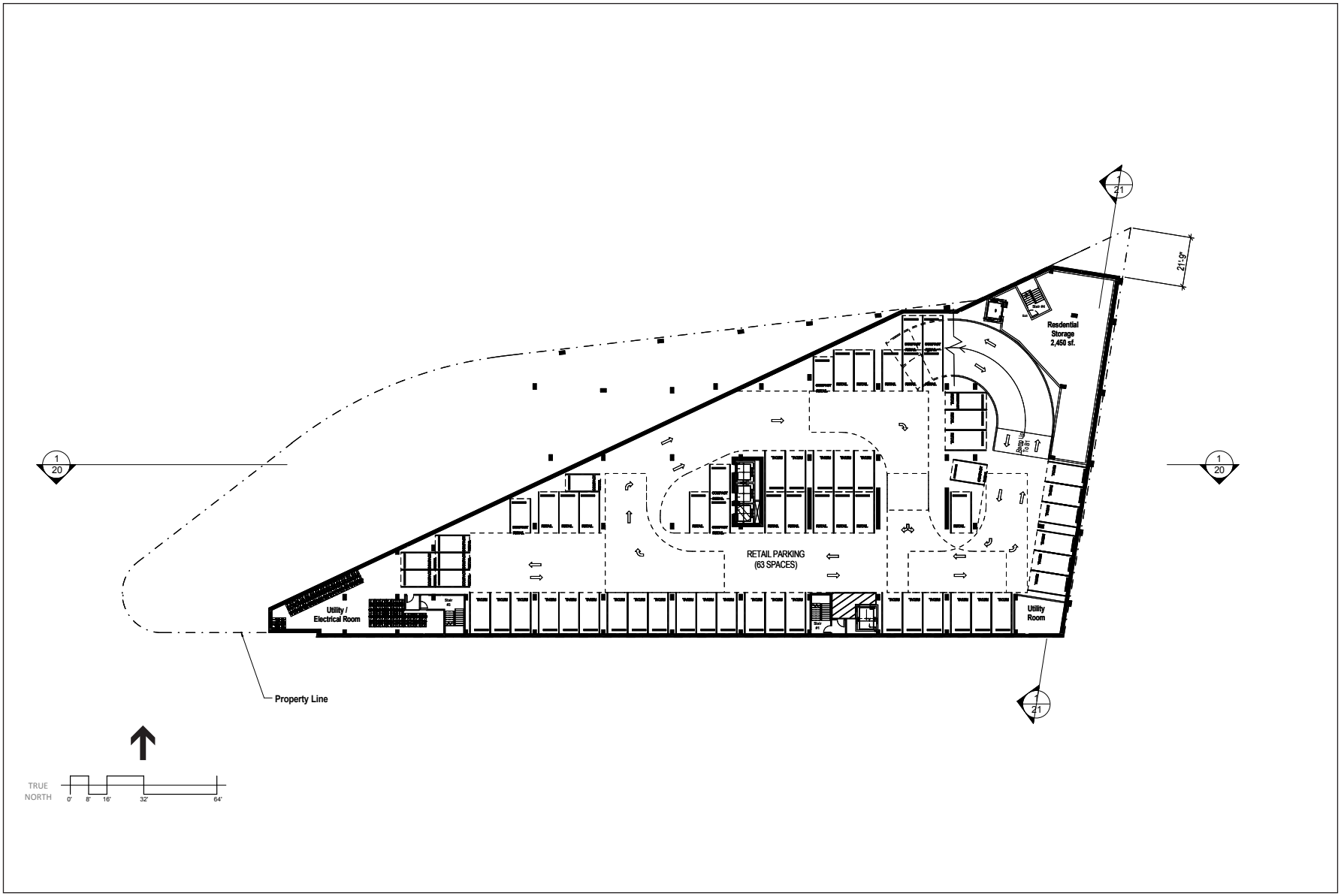
According to the Los Angeles Municipal Code (LAMC), the project is required to provide 19,425 sf of open space. Approximately 26,862 sf of usable common and private open space areas would be provided as a part of the proposed project. As shown in **Figure A-13**, the project includes 19,262 sf of common open space (Ground level, level 5, and level 20) and 7,600 sf of private open space. Ground level common open space would include a water feature, pedestrian walkways, an outdoor dining plaza, sitting areas, and landscaping throughout the southern portion of the site. Level 5, located on top of the podium base, would include common open space areas that contain raised planters, trees, and passive garden space. Level 20, the level above the penthouses and below mechanical/elevator penthouse rooftop level, would include plantings, a flower trellis, seating areas, a pool, spa, terrace, fire pit, barbecue area, fitness area, and lounge. In addition to common open space, all units would be provided with hardscape private patio areas on their balconies totaling 7,600 sf.



SOURCE: Caruso Affiliated 2015

333 La Cienega Blvd . 140525

Figure A-3
Project Site Plan



SOURCE: Caruso Affiliated 2015

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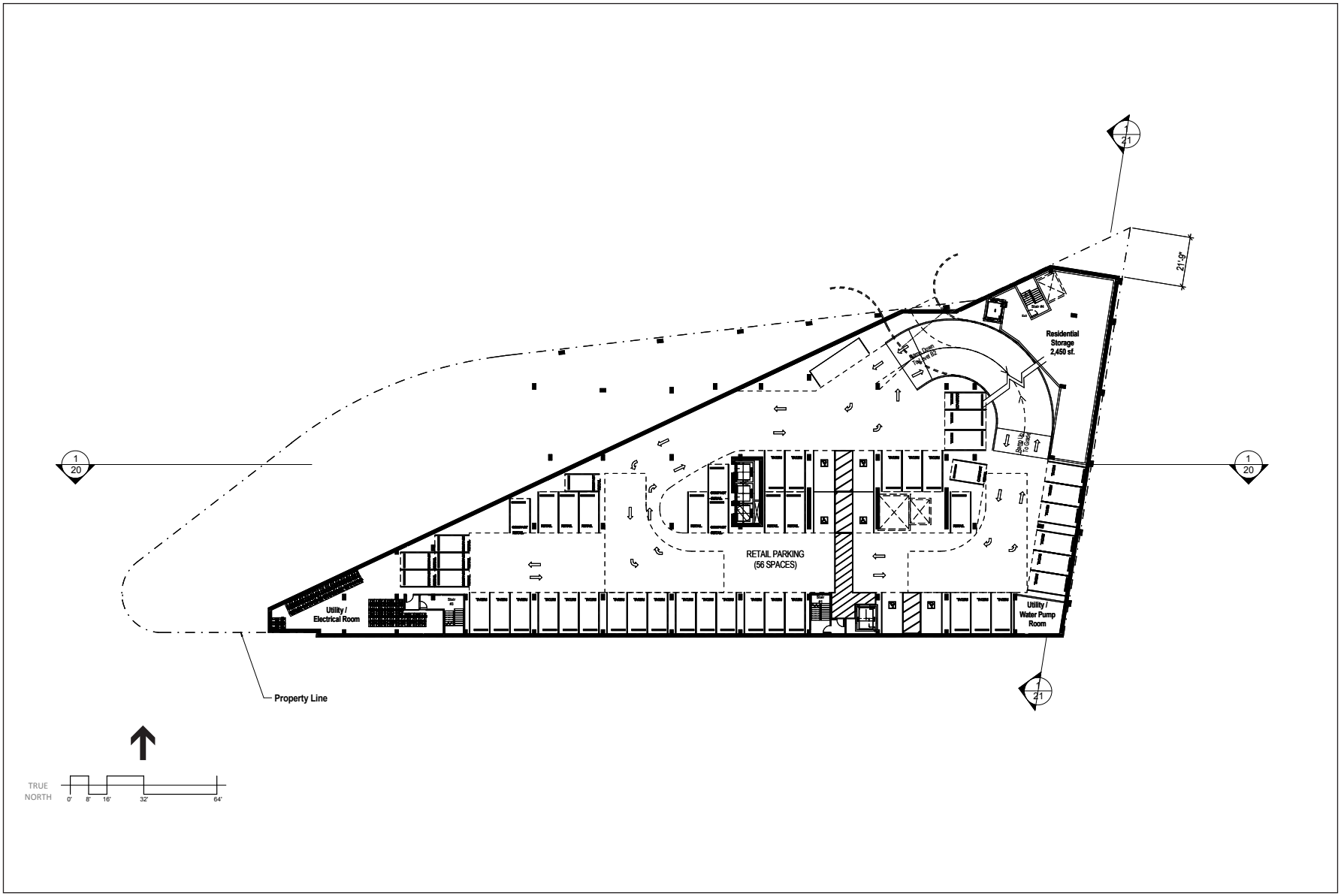
Figure A-4

Subterranean Level 2



SOURCE: Caruso Affiliated 2015

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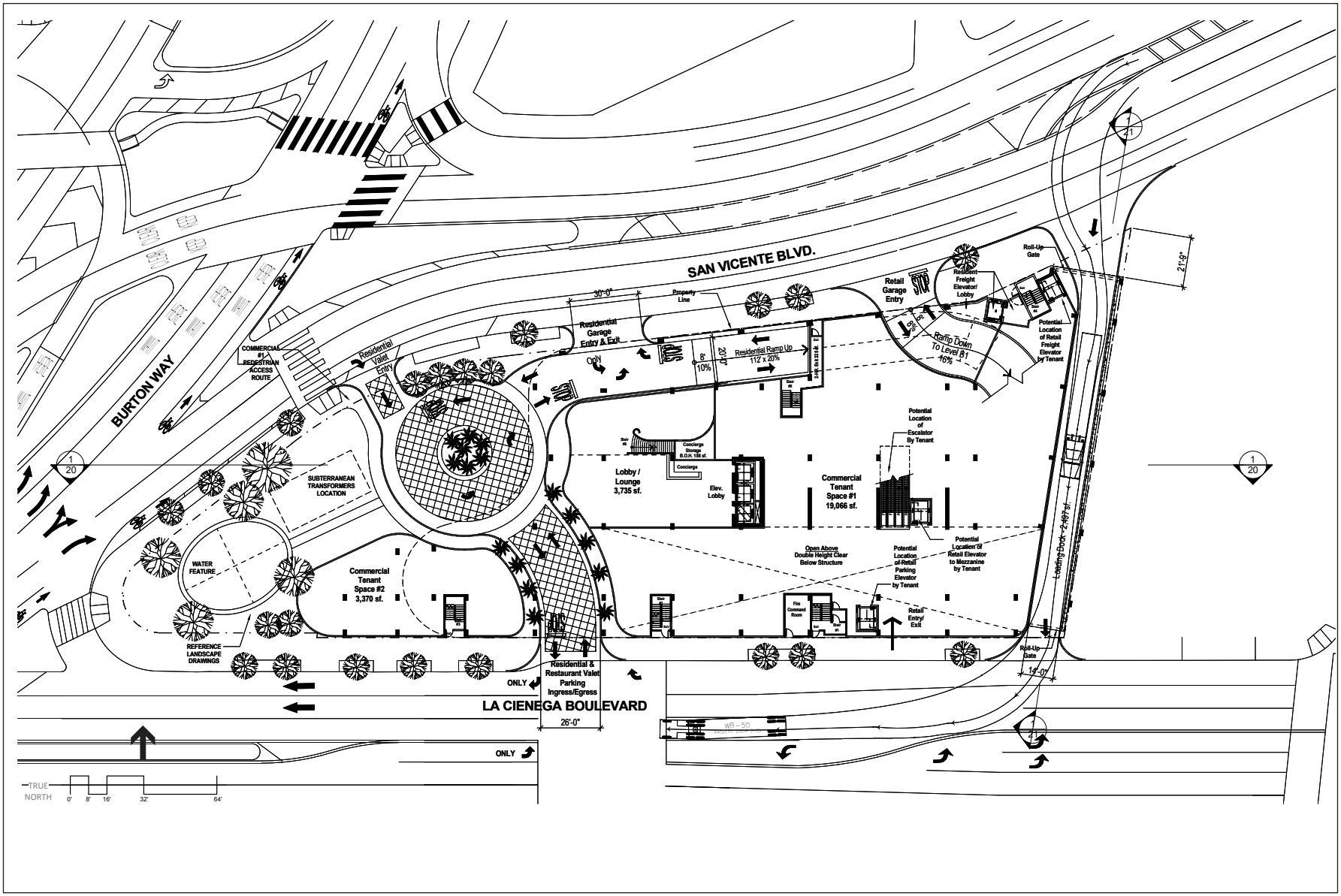
Figure A-5

Subterranean Level 1



SOURCE: Caruso Affiliated 2015

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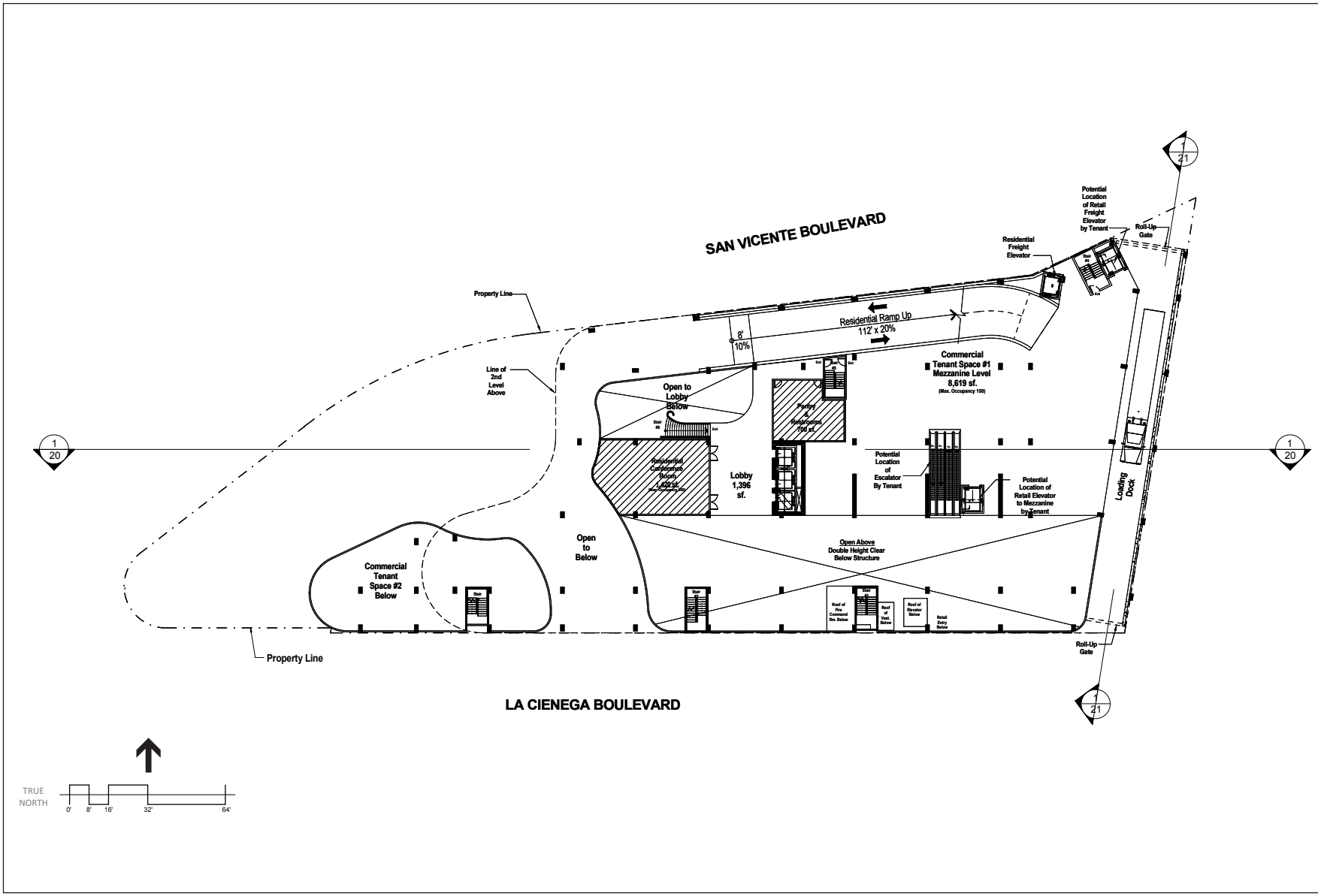
Figure A-6
Ground Level



SOURCE: Caruso Affiliated 2015

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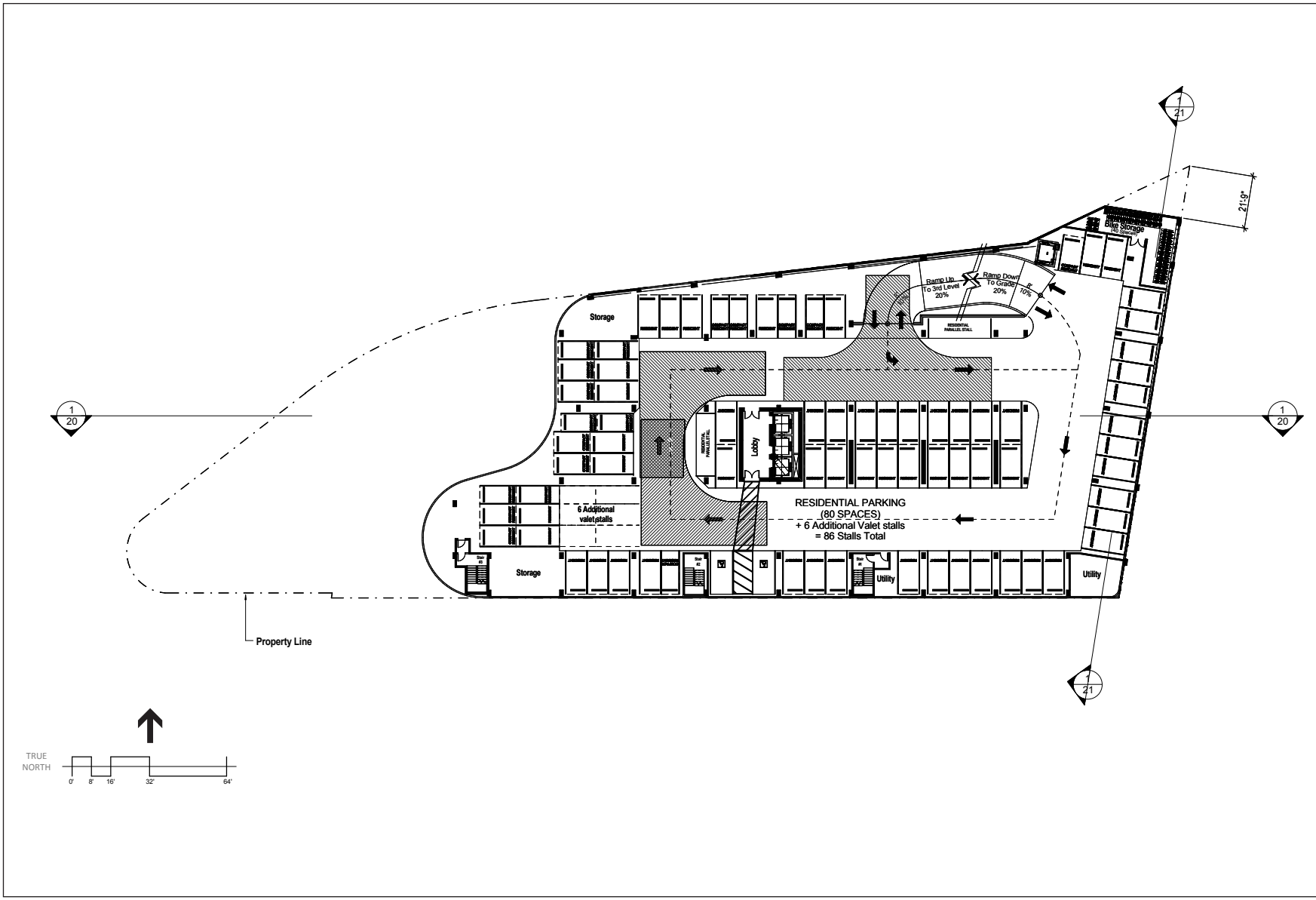
Figure A-7
Mezzanine Level



SOURCE: Caruso Affiliated 2015

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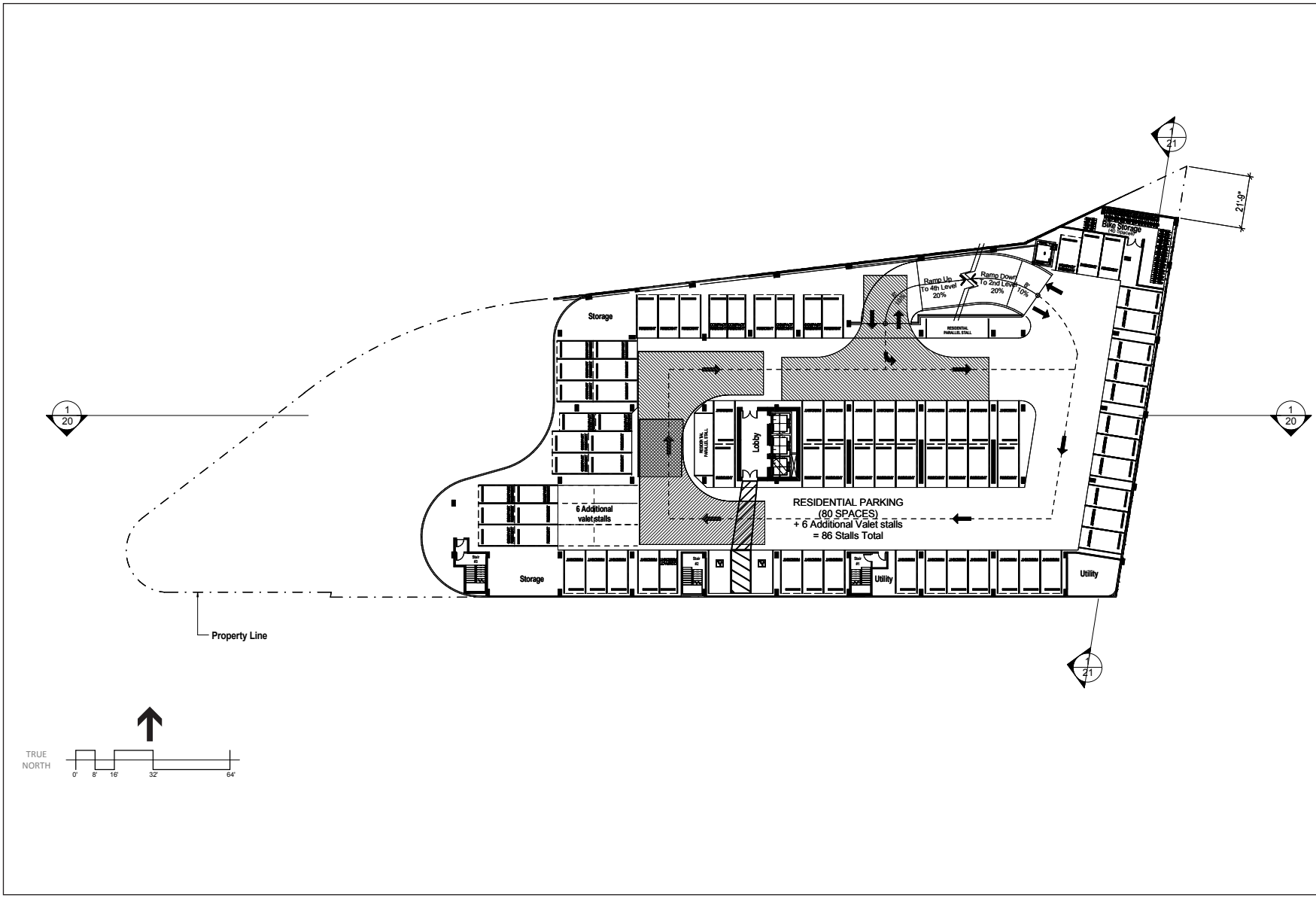
Figure A-8

Residential Parking Level 2



SOURCE: Caruso Affiliated 2015

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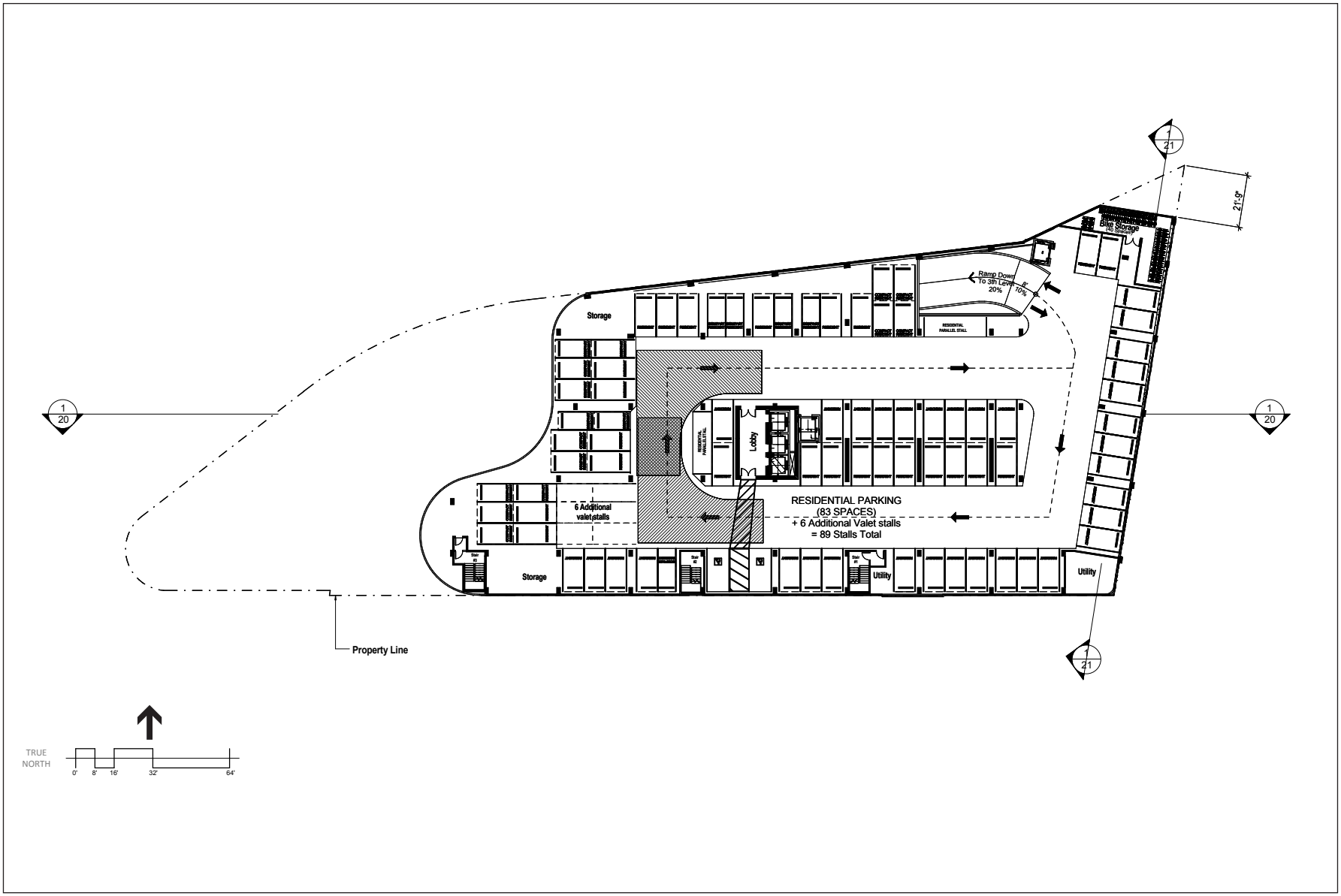
Figure A-9

Residential Parking Level 3



SOURCE: Caruso Affiliated 2015

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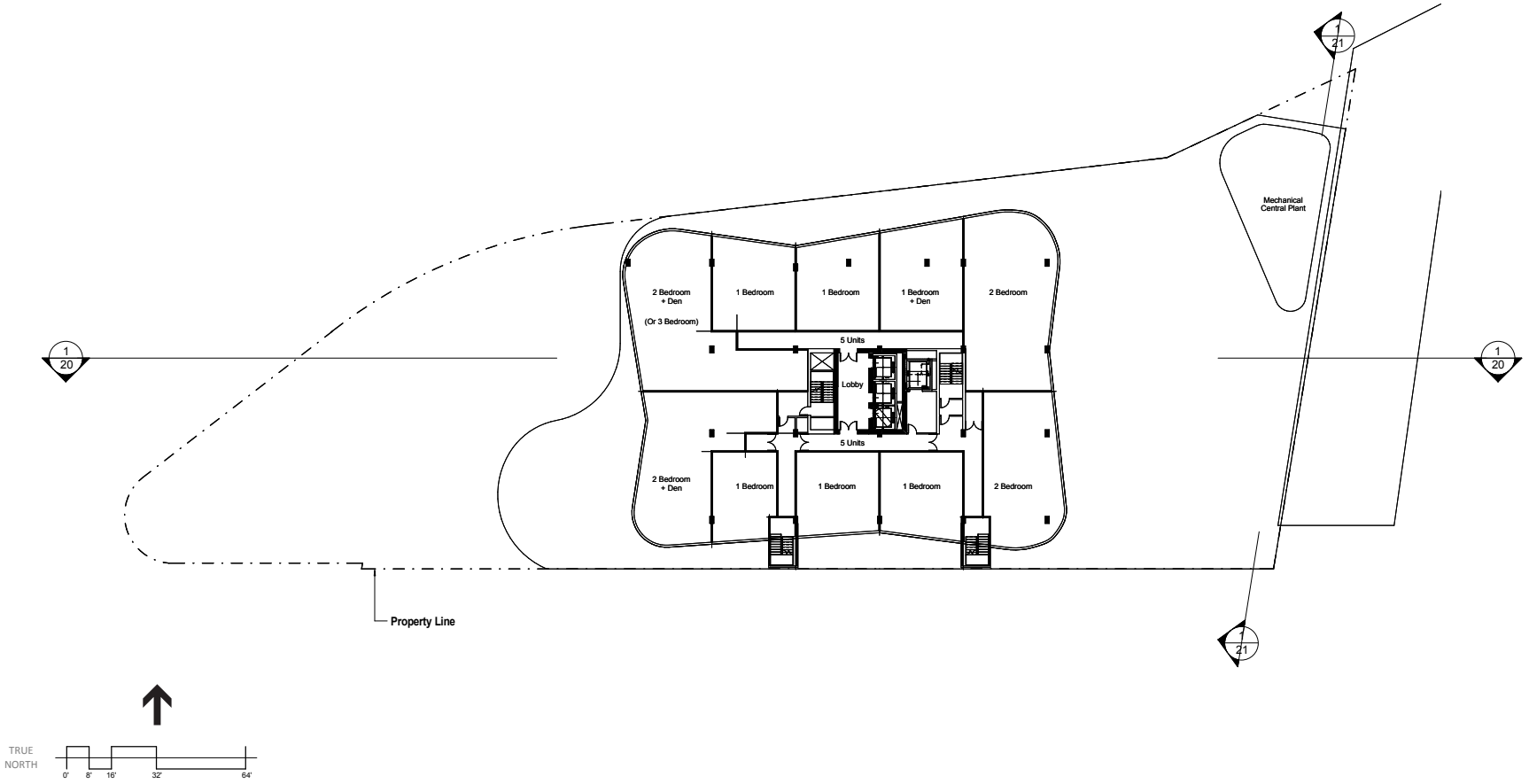
Figure A-10

Residential Parking Level 4



SOURCE: Caruso Affiliated 2015

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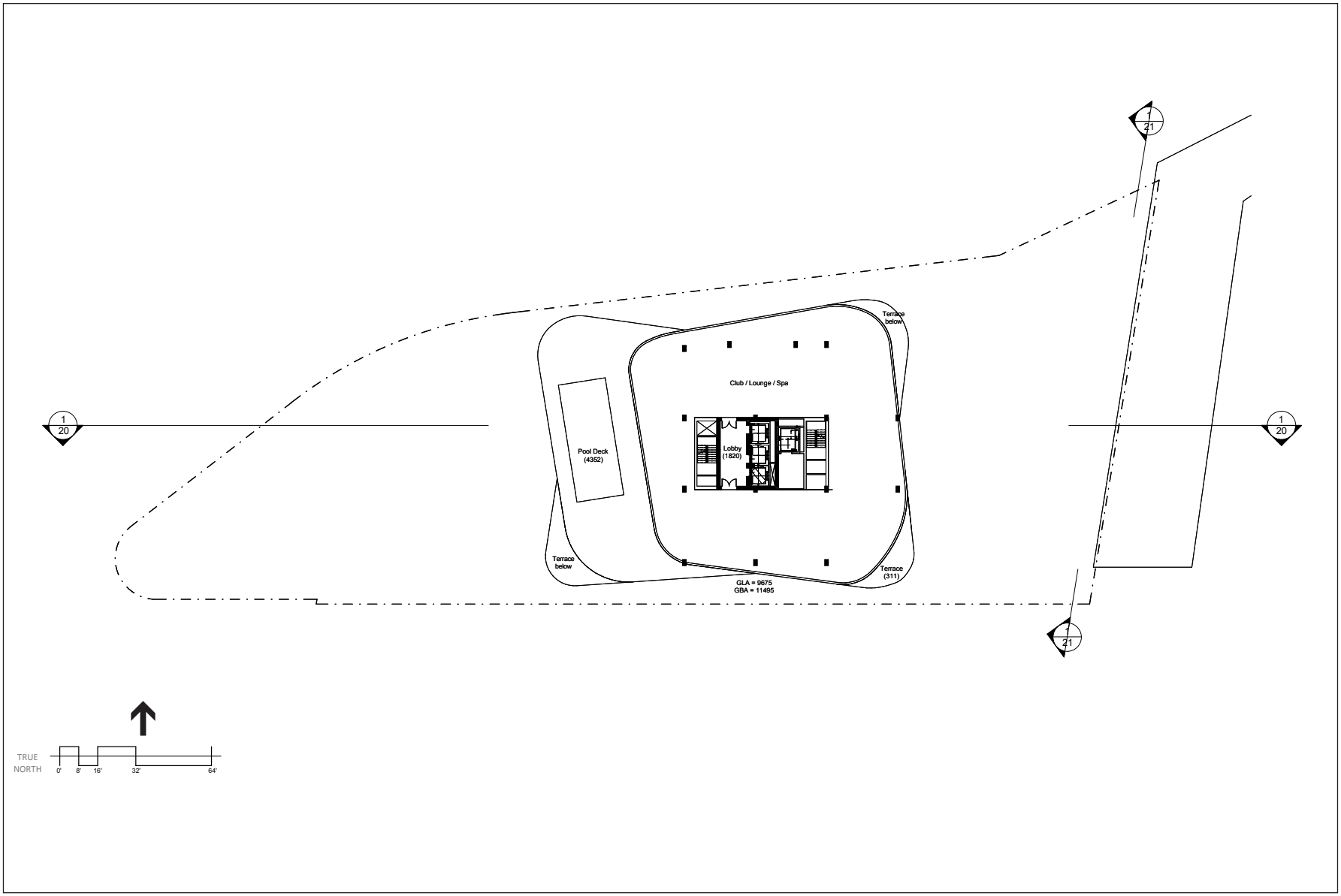
Figure A-11

Residential Tower Plan Levels 5-19



SOURCE: Caruso Affiliated 2015

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Figure A-12

Level 20 - Amenity Level Plan

OPEN SPACE CALCULATIONS

RESIDENTIAL OPEN SPACE CALCULATION
Per LAMC Section 12.21 G.2:
145 Total units:
(70 Units @100 SF + 14 Units @125 SF + 61 Units @175 SF)
Total Open Space Required: 19,425 SF

OPEN SPACE PROVIDED
COMMON OPEN SPACE

Level 1 Proposed	6,910 SF
Level 5 Proposed	8,000 SF
Level 20 Proposed	4,352 SF
Total Common Open Space Proposed:	**19,262 SF**

PRIVATE OPEN SPACE

Level 5 Proposed	600.00
Level 6 Proposed	600.00
Level 7 Proposed	600.00
Level 8 Proposed	600.00
Level 9 Proposed	600.00
Level 10 Proposed	600.00
Level 11 Proposed	600.00
Level 12 Proposed	600.00
Level 13 Proposed	600.00
Level 14 Proposed	600.00
Level 15 Proposed	600.00
Level 16 Proposed	600.00
Level 17 Proposed	300.00
Level 19 Proposed	100.00
Total Private Open Space Proposed:	**7,600 SF**

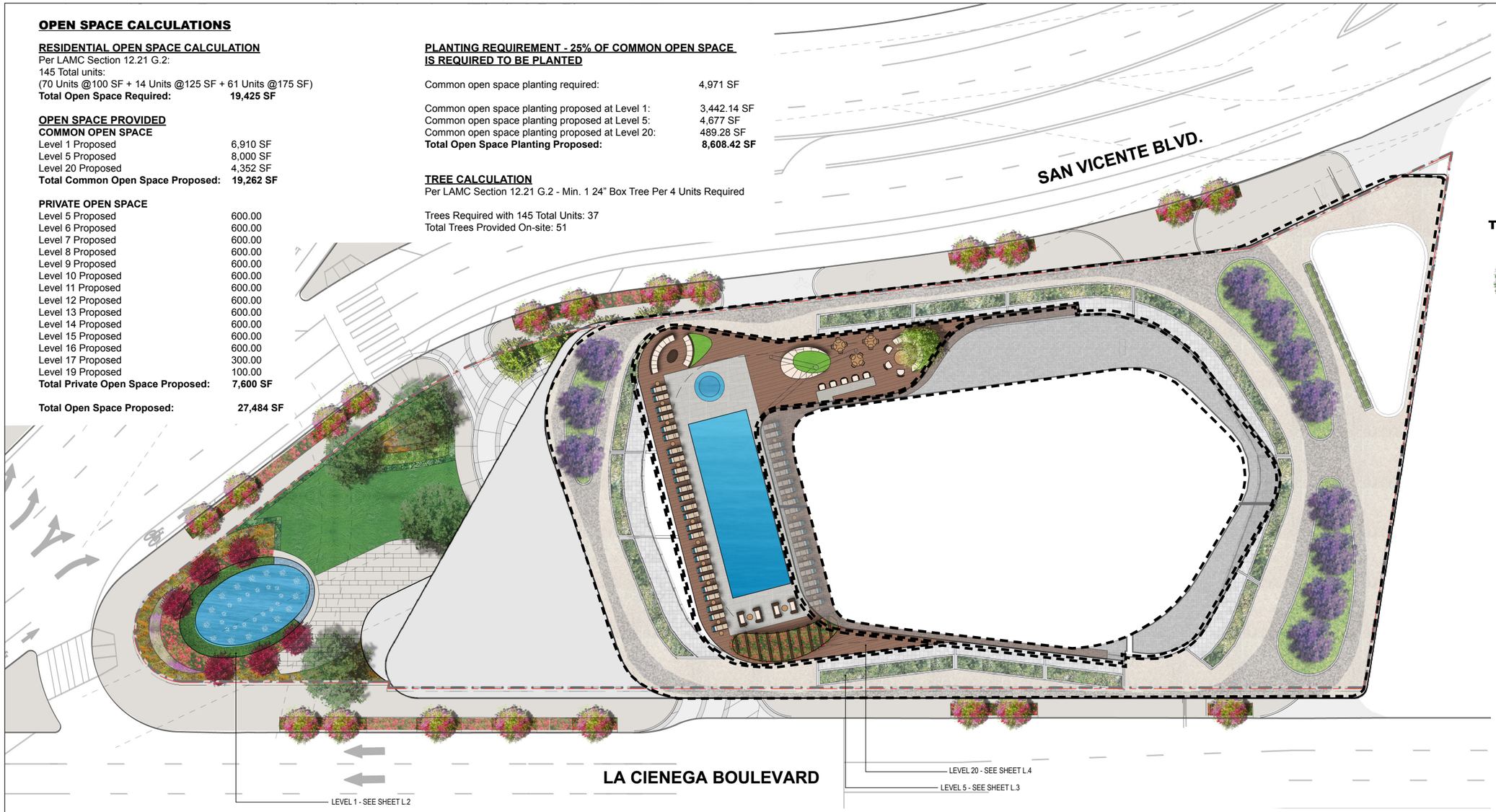
Total Open Space Proposed: 27,484 SF

PLANTING REQUIREMENT - 25% OF COMMON OPEN SPACE IS REQUIRED TO BE PLANTED

Common open space planting required:	4,971 SF
Common open space planting proposed at Level 1:	3,442.14 SF
Common open space planting proposed at Level 5:	4,677 SF
Common open space planting proposed at Level 20:	489.28 SF
Total Open Space Planting Proposed:	**8,608.42 SF**

TREE CALCULATION
Per LAMC Section 12.21 G.2 - Min. 1 24" Box Tree Per 4 Units Required

Trees Required with 145 Total Units: 37
Total Trees Provided On-site: 51



TREE LEGEND

- **ERYTHRINA CAFFRA** Coral Tree
- **HANDROANTHUS IMPTEIGINOSUS** Pink Tabebuia
- **PLATANUS RACEMOSA** Western Sycamore
- **LAGERSTROEMIA 'TUSCORARA'** Bright Pink Tuscorara Crape Myrtle
- **LAGERSTROEMIA 'NATCHEZ'** White Natchez Crape Myrtle
- **LAGERSTROEMIA 'MUSKOGEE'** Lavender Crape Myrtle
- **OLEA EUROPAEA** Olive Tree

SOURCE: Caruso Affiliated 2015

Figure A-13
Landscape Plan and Open Space

333 La Cienega Blvd . 140525

SOURCE: Caruso Affiliated 2015

Figure A-14
Conceptual Rendering of Proposed Project

SOURCE: Caruso Affiliated 2015

333 La Cienega Blvd . 140525

Figure A-15

West Building Elevation (San Vicente Boulevard)

SOURCE: Caruso Affiliated 2015

333 La Cienega Blvd . 140525

Figure A-16

East Building Elevation (La Cienega Boulevard)

3. Access and Parking

As shown in Figure A-3, Project Site Plan, vehicular access to the project site would be provided by two driveways along La Cienega Boulevard (the first driveway would be located at the intersection of La Cienega Boulevard and Blackburn Avenue and the second driveway would be north of this on La Cienega Boulevard south of 3rd Street, across from an alleyway), and four driveways along San Vicente Boulevard (including a residential valet entry, residential garage entry/exit, retail garage entry and a loading dock). Residential and restaurant access would be provided using two entrances and one exit on San Vicente Boulevard. The southernmost driveway on San Vicente Boulevard would allow inbound northbound right turns only. The second driveway on San Vicente Boulevard would allow inbound left turns from southbound San Vicente Boulevard and outbound right turns. Retail parking access would be provided through one entrance and exit on La Cienega Boulevard, at the intersection of La Cienega Boulevard and the unnamed alley south of 3rd Street, and an additional exit on San Vicente Boulevard. The existing signal at the southern driveway on La Cienega Boulevard would remain. This driveway would be a full-movement intersection except that the eastbound and westbound through movements and the outbound left turn movement would be prohibited, in the same manner as it operates today. In addition, a retail service and delivery entrance would allow inbound left turns from southbound San Vicente Boulevard and the exit would allow outbound right turns onto southbound La Cienega Boulevard.

The proposed project would provide five levels of parking with a total of 362 parking spaces. As shown in Figures A-4 and A-5, two levels of subterranean parking containing a total of 119 parking spaces would be provided for commercial retail uses. Three levels of above-ground parking (Levels 2 through 4) would provide a total of 243 parking spaces for the residential units, as shown in Figures A-8 through A-10. The parking provided as a part of the proposed project would be in compliance with the LAMC, which requires the project to provide a total of 361 parking spaces. In addition to vehicle parking, the proposed project would provide a total of 264 bicycle parking spaces in compliance with LAMC Ordinance No. 182386, including 160 bicycle parking spaces for residential uses and 104 bicycle parking spaces for commercial retail uses.

The project area is currently served by a total of four local and inter-city transit operators, including nine bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro), one local DASH route operated by the Los Angeles Department of Transportation (LADOT), one bus line operated by Antelope Valley Transit, and a line operated by the City of West Hollywood.

G. Construction Activities and Schedule

Construction of the proposed project is expected to last approximately two years and is tentatively scheduled to begin in late 2016 and continue through late 2018. Construction activities would commence with demolition of the existing structure and pavement, followed by site preparation, excavation and grading; installation of drainage and utilities, and building construction and application of architectural coatings. Demolition activities would result in the removal of approximately 25,000 cubic yards of building materials, with a maximum of 36 truckloads per

day. It is anticipated that demolition and site preparation would occur over a three month period. Approximately 28,000 cubic yards of soil, with a maximum of 25 truckloads per day, would be removed from the project site during the excavation and grading phase. The construction haul route from the project site would travel south on La Cienega Boulevard to the Santa Monica Freeway. The excavation and grading phase would also last approximately three months. Given that the most extensive amount of construction equipment used daily at the project site would occur during the demolition phase, the Applicant, in an effort to minimize the daily amount of emissions that adjacent uses to the project site would be exposed to, would implement a project design feature (PDF) that requires all off-road construction equipment exceeding 50 horsepower (hp) used during the project's demolition phase to either meet, at a minimum, the U.S. Environmental Protection Agency (USEPA) Tier IV interim engine certification requirements, or apply other available technologies to the construction equipment that would achieve the same pollutant emissions reduction as USEPA Tier IV construction equipment. The PDF is included and described in Attachment B, *Explanation of Checklist Determinations*. The remaining phases would occur over an approximately 18-month period.

Construction is expected to occur between the hours of 7:00 a.m. and 4:00 p.m. on Monday through Friday, and during the hours of 8:00 a.m. and 4:00 p.m. on Saturday. These hours are reduced relative to what is allowed by the LAMC Noise Ordinance, which allows construction between the hours of 7:00 a.m. and 8:00 p.m. on non-holiday weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays. No construction would occur on Sundays or federal holidays.

The number of construction workers and construction equipment would vary throughout the construction process in order to maintain an effective schedule of completion. It is estimated that during the construction period the number of workers that would be onsite would range from approximately 50 to 125, with a peak of approximately 200 workers.

H. Necessary Approvals

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

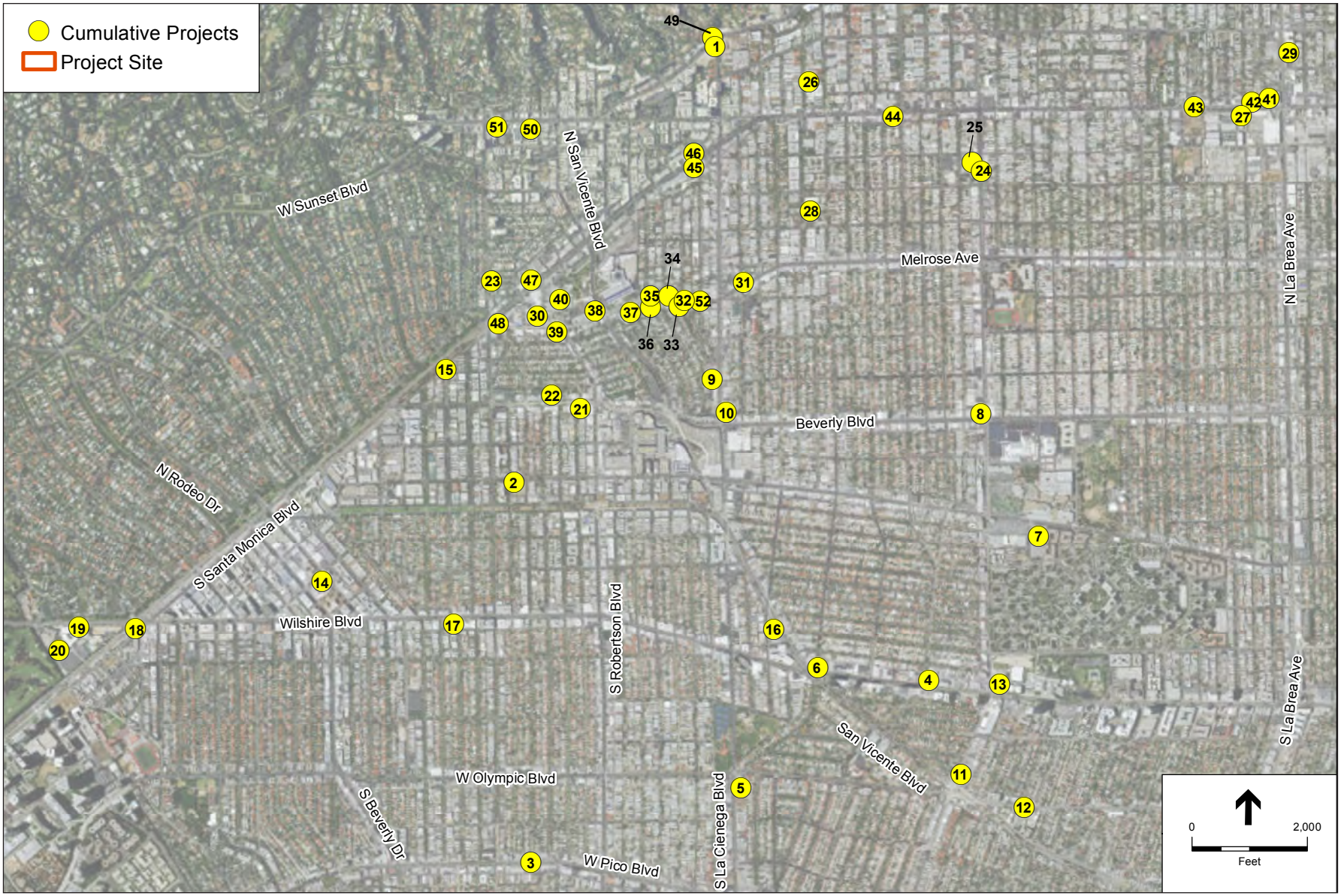
- Zone change from C2-1VL-O to C2-2-O to change the Height District 1VL to Height District 2 to allow construction of a 240-foot building.
- General Plan Amendment to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial.
- Site Plan Review pursuant to LAMC Section 16.05 for a residential development that is greater than 50 dwelling units.
- Variance to allow alternative locations for long-term bicycle parking within the building.
- Master Conditional Use Permit to allow the sale of alcohol.

I. Cumulative Development

Cumulative impacts refer to the combined effect of the proposed project's impacts with the impacts of other past, present and reasonably foreseeable future projects. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts, and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone."

Cumulative study areas are defined based on an analysis of geographic scope relevant to the specific environmental issue to be analyzed. The projects included in this analysis were based on input from the Cities of Los Angeles, Beverly Hills and West Hollywood and adequately represent potential regional and local impacts to the area on a cumulative basis.

The cumulative projects considered in this Initial Study are listed in **Table A-1** and the locations are identified in **Figure A-17**.



SOURCE: Mobility Group 2015

333 La Cienega Blvd . 140525

Figure A-17
Cumulative Projects Map

TABLE A-1
LIST OF RELATED PROJECTS

Project No.	Location / Address	Jurisdiction	Land Use	Size
1	8500 West Sunset Boulevard	City of Los Angeles	Hotel	371 rooms
			Retail/Restaurant	34,000 square feet
			Theater	7,000 square feet
			Dinning	2,500 square feet
2	300 South Wetherly Drive	City of Los Angeles	Condominiums	140 dwelling units
3	9001 West Pico Boulevard	City of Los Angeles	Private School	425 student
			Retail	9,615 square feet
			Apartment	31 dwelling units
4	6245 West Wilshire Boulevard	City of Los Angeles	Bank	4,200 square feet
			Apartment	133 dwelling units
			Condominiums	4 dwelling units
			Coffee Shop	1,570 square feet
5	1022 South La Cienega Boulevard	City of Los Angeles	Assistance Living	183 beds
			Skilled Nursing	22 dwelling units
6	6535 Wilshire Boulevard	City of Los Angeles	Apartment	21 dwelling units
			Office	57,000 square feet
			Retail	6,000 square feet
7	6298 West 3rd Street	City of Los Angeles	Condominiums	150 dwelling units
			Apartment	150 dwelling units
8	7901 West Beverly Boulevard	City of Los Angeles	Apartment	71 dwelling units
			Retail	11,454 square feet
9	375 North La Cienega Boulevard	City of Los Angeles	Apartment	125 dwelling units
			Retail	7,900 square feet
10	316 North La Cienega Boulevard	City of Los Angeles	Apartment	45 dwelling units
			Café	800 square feet
			Retail	3,680 square feet
11	910 South Fairfax Avenue	City of Los Angeles	School	63 seats
			Apartment	149 dwelling units
			Retail	4,640 square feet

TABLE A-1
LIST OF RELATED PROJECTS

Project No.	Location / Address	Jurisdiction	Land Use	Size
12	5889 West Olympic Boulevard	City of Los Angeles	Apartment	49 dwelling units
			Medical Office	4,000 square feet
13	6067 West Wilshire Boulevard	City of Los Angeles	Visitors	5,000 persons
			Employees	135 persons
			Retail	5,000 square feet
			Restaurant	4,000 square feet
14	257-267 North Canon Drive	City of Beverly Hills	Theater	388 seats
			Retail	24,000 square feet
			Office	4,000 square feet
15	450-460 North Palm Drive	City of Beverly Hills	Condominiums	35 dwelling units
16	121 San Vicente Boulevard	City of Beverly Hills	Medical Office	35,000 square feet
17	9200 Wilshire Boulevard	City of Beverly Hills	Condominiums	53 dwelling units
			Retail	8,400 square feet
			Restaurant	5,600 square feet
18	9844 Wilshire Boulevard	City of Beverly Hills	Restaurant	5,043 square feet
			Retail	95,000 square feet
19	9876 Wilshire Boulevard	City of Beverly Hills	Condominiums	110 dwelling units
			Restaurant	5,000 square feet
			Retail	5,000 square feet
			Hotel	-46 rooms
20	9900 Wilshire Boulevard	City of Beverly Hills	Motel	220,000 square feet
			Condominiums	235 dwelling units
			Motel	11,656 square feet
			High Turnover Restaurant	4,200 square feet
21	8816 Beverly Boulevard	City of West Hollywood	Apartments	12 dwelling units
			Retail	8,000 square feet
			Restaurant	1,860 square feet
			Office	25,575 square feet
			Retail	-11,493 square feet

TABLE A-1
LIST OF RELATED PROJECTS

Project No.	Location / Address	Jurisdiction	Land Use	Size
22	8899 Beverly Boulevard	City of West Hollywood	Apartment	12 dwelling units
			Condominiums	56 dwelling units
			Townhomes	13 dwelling units
			Office	10,562 square feet
			Retail	19,875 square feet
			Restaurant	4,394 square feet
			Office	-64,502 square feet
			Retail	-21,249 square feet
			Restaurant	-3,879 square feet
23	702 Doheny Drive	City of West Hollywood	Condominiums	50 dwelling units
			Single Family Housing	-2 dwelling units
24	920 Fairfax Avenue	City of West Hollywood	Mixed dwelling units	9,011 square feet
25	937 Fairfax Avenue	City of West Hollywood	Affordable Condo	17 dwelling units
			Commercial	1,440 square feet
26	1216 Flores Street	City of West Hollywood	Condominiums	14 dwelling units
27	1041 Formosa Avenue	City of West Hollywood	Creative Office/Media Support	118,854 square feet
			Office	113,230 square feet
28	826 Kings Road	City of West Hollywood	Condominiums	29 dwelling units
			Affordable Condo	5 dwelling units
			Single Family Housing	-1 dwelling unit
29	1222 La Brea Avenue	City of West Hollywood	Apartment	187 dwelling units
			Convention Store	5,664 square feet
			Restaurant	7,089 square feet
			Coffee Shop	2,300 square feet
			Bank	4,506 square feet
30	623 La Peer Drive	City of West Hollywood	Hotel	36 rooms
			Condominiums	-8 dwelling units
31	8451 Melrose Avenue	City of West Hollywood	Retail	3,929 square feet
			Warehouse	-3,929 square feet
32	8551 Melrose Avenue	City of West Hollywood	Retail	6,480 square feet

TABLE A-1
LIST OF RELATED PROJECTS

Project No.	Location / Address	Jurisdiction	Land Use	Size
33	8564 Melrose Avenue	City of West Hollywood	Commercial	28,474 square feet
34	8583 Melrose Avenue	City of West Hollywood	Retail	9,545 square feet
			Restaurant	1,958 square feet
			Commercial	-6,746 square feet
35	8611 Melrose Avenue	City of West Hollywood	Commercial	3,070 square feet
36	8612 Melrose Avenue	City of West Hollywood	Restaurant	9,874 square feet
			Wholesale	-9,874 square feet
37	8650 Melrose Avenue	City of West Hollywood	Retail	14,571 square feet
			Apartment	7 dwelling units
38	8711 Melrose Avenue	City of West Hollywood	Commercial	21,565 square feet
39	8808 Melrose Avenue	City of West Hollywood	Retail	2,946 square feet
			Art Gallery	-2,322 square feet
40	645 Robertson Boulevard	City of West Hollywood	Hotel	251 rooms
			Retail	-10,551 square feet
			Night Club	-7,939 square feet
			Restaurant	-3,969 square feet
			Gym	-3,969 square feet
41	7113 Santa Monica Boulevard	City of West Hollywood	Apartment	184 dwelling units
			Convention Store	3,300 square feet
			Restaurant	4,800 square feet
			Pharmacy	3,250 square feet
			Bank	2,000 square feet
42	7141 Santa Monica Boulevard	City of West Hollywood	Apartments	166 dwelling units
			Retail	6,853 square feet
			Restaurant	2,447 square feet
			Manufacturing	-39,500 square feet
43	7300 Santa Monica Boulevard	City of West Hollywood	Retail	32,300 square feet
			Affordable Condo	77 dwelling units
			Condo	294 dwelling units

TABLE A-1
LIST OF RELATED PROJECTS

Project No.	Location / Address	Jurisdiction	Land Use	Size
44	8120 Santa Monica Boulevard	City of West Hollywood	Retail	13,830 square feet
			Residential Units	28 dwelling units
45	8550 Santa Monica Boulevard	City of West Hollywood	Condo	20 dwelling units
			Retail	8,700 square feet
46	8555 Santa Monica Boulevard	City of West Hollywood	Mixed-dwelling units	5 Story
47	9001 Santa Monica Boulevard	City of West Hollywood	Condo	42 dwelling units
48	9040-9098 Santa Monica Boulevard	City of West Hollywood	Commercial	302,944 square feet
			Commercial	-89,000 square feet
49	8497 Sunset Boulevard	City of West Hollywood	Mixed dwelling units	28,139 square feet
			Mixed dwelling units	-16,240 square feet
50	8950 Sunset Boulevard	City of West Hollywood	Hotel	196 rooms
			Condo	4 dwelling units
51	9040 Sunset Boulevard	City of West Hollywood	Hotel	148 rooms
			Condo	20 dwelling units
52	605 West Knoll Drive	City of West Hollywood	Retail	7,270 square feet
			Retail	-1,311 square feet
53	333 La Cienega Boulevard	City of Los Angeles	Retail	47,676 square feet

Source: The Mobility Group, 2015.

ATTACHMENT B
Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an Environmental Impact Report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and, thus, do not need to be addressed further in an EIR. The Applicant has proposed Project Design Features (PDFs) that would be implemented as a part of the proposed project. Once a PDF is introduced, it is included in its entirety following the question where it is first mentioned. PDFs are numbered sequentially throughout the document (i.e. PDF-1, PDF-2, etc.). Mitigation measures are included where a potentially significant impact can be reduced through the implementation of a mitigation measure without further analysis in the EIR. Once a mitigation measure is introduced, it is included in entirety following the question where it is first mentioned. The numbering for mitigation measures is depicted by a letter prefix that corresponds to the section and listed sequentially (i.e. in Section 8, *Hazards and Hazardous Materials*, mitigation measures would be labeled HAZ-1, HAZ-2, etc.). The questions with responses indicating a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the proposed project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within that future document.

1. Aesthetics

Would the project:

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

Less than Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest or panoramic views of large geographic areas of scenic quality from a given vantage point. According to the *L.A. CEQA Thresholds Guide*, the determination of significance for aesthetic impacts shall be made on a case-by-case basis, considering the following factors: the amount of relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community or localized area, which would be removed, altered, or demolished; the amount of natural open space to be graded or developed; the degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.; the degree of contrast between proposed features and existing features that would represent the area's valued aesthetic image; the degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height,

bulk, setbacks, signage, or other physical elements; the degree to which the project would contribute to the area's aesthetic value; and applicable guidelines and regulations.[1]

The project site is located along the western edge of the Wilshire Community Plan Area. This portion of the Wilshire Community Plan Area is a highly urbanized neighborhood and is characterized by commercial, retail, institutional, and residential uses. Cedars-Sinai Medical Center, Beverly Center (an eight-story shopping mall complex), and Beverly Connection (an open air shopping center) are located across 3rd Street to the northwest, north, and northeast, respectively. The Westbury Terrace condominium tower located at 321 San Vicente Boulevard, and Our Lady of Mount Lebanon-St. Peter Cathedral located at 333 San Vicente Boulevard, are directly west of the project site across San Vicente Boulevard. Immediately north, within the same block of the project site, is a single-story strip mall commercial center containing restaurant and retail uses. Across La Cienega Boulevard to the east of the project site are one and two-story commercial-retail strip malls, with residential uses east of these commercial/retail centers. A mixed-use residential/retail building lies directly to the south of the project site at 8500 Burton Way, at the intersection of Burton Way, La Cienega Boulevard, and San Vicente Boulevard. Residential uses are located farther south of Burton Way and west of Le Doux Road.

The project site is located near visual resources of merit, including the Hollywood Hills to the north, the Baldwin Hills to the south, and one historic resource, the National Register and California Register-eligible Our Lady of Mount Lebanon-St. Peter Cathedral, to the west. These locations are not identified as scenic vistas in the Wilshire Community Plan, but are considered as valued visual resources for the purposes of this analysis. The proposed project would replace an existing three-story structure with a 20-story structure, including 3,923 sf of commercial retail on the ground floor, a mezzanine level with 8,619 sf of commercial uses and 3,516 sf of residential lobby space, and 14 levels of residential units (Levels 5 through 19), and one level with amenities (Level 20), that has the potential to be visible within scenic vistas of valued visual resources and potentially alter views of scenic vistas from some locations within the project vicinity.

The project site is located within an urban area, and although it is possible to see partial views of the surrounding hills in the distance, the views are intermittently blocked by existing buildings. Views of the Hollywood Hills to the north are partially obscured by high-rise buildings, such as the 125-foot high Beverly Center (8 stories), the 118-foot high Westbury Terrace condominium tower (12 stories), and the various buildings of up to 10 stories in height of the Cedars-Sinai Center Medical Center. Since the project site is surrounded by many high-rise buildings, long distance north-facing views of the Hollywood Hills from the project site are limited. For views south, existing high-rise buildings also block views from the project site to the Baldwin Hills. The proposed project would not substantially limit views of these hills from the area surrounding the project site since the project vicinity is already highly developed with high-rise buildings.

As a part of the proposed project, a 20-story mixed-use development would be constructed on the project site, which is already developed with a three-story structure. The height of the proposed project would be approximately 240 feet, which would be 122 feet higher than the 118-foot tall

[1] City of Los Angeles, 2006. *L.A. CEQA Thresholds Guide*.

Westbury Terrace condominium tower to the west of the project site and 115 feet higher than the 125-foot Beverly Center building to the north. While the proposed project would be taller than the surrounding buildings, as described above, long distance views of the Hollywood Hills to the north and the Baldwin Hills to the south are already limited. Thus, views to the north and south of the project site would not be obstructed by the proposed project. For views to the east, the proposed project would potentially obstruct views from the Westbury Terrace condominium tower, above the third level, looking east past the project site. However, these views are already partially blocked by the existing building on the project site. Moreover, there are no views of visual interest or panoramic views of scenic quality from this vantage point**.** Finally, views to the west of the project site are blocked by the Westbury Terrace condominium tower.

The proposed project would alter existing views by constructing a 20-story building in an area where the tallest development is approximately 12-stories; however, as described above, views of the surrounding area are already limited, partially obstructed, and are not considered scenic vistas by the Wilshire Community Plan. While some limited and partially obstructed views that currently exist through the project site to surrounding hills and mountains may be obstructed, due to the existing compromised nature of these views and due to the extent of surrounding urban development which already partially or fully obstruct views of surrounding hills and mountains, the proposed project would not result in a substantial adverse effect on a scenic vista. Therefore, this impact would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

Less than Significant Impact. The project site is not located within a state scenic highway; however, it located on or adjacent to scenic corridors as defined by the Wilshire Community Plan.[2] According to the Wilshire Community Plan, Burton Way, from La Cienega Boulevard to Oakhurst Drive, and San Vicente Boulevard, between Pico Boulevard and La Cienega Boulevard, are considered City-designated scenic corridors.[3] The Burton Way scenic corridor borders the project site to the south whereas the San Vicente Boulevard corridor is adjacent to the southeast corner of the project site.

While there are direct views of Our Lady of Mount Lebanon-St. Peter Cathedral, a historic resource, construction of the proposed project would not damage this resource and/or obstruct views of the resource from Burton Way or San Vicente Boulevard. Furthermore, there are no trees, rock outcroppings, or other desirable aesthetic natural features which can be viewed from San Vicente Boulevard. Therefore, the proposed project would not substantially damage a scenic

2 Caltrans, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed April 16, 2015.
3 City of Los Angeles, 2001. Wilshire Community Plan.

resource and impacts would be less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project site is currently occupied by a three-story commercial building (a vacant department store on the ground floor and three levels of parking above) and minimal landscaping. The project vicinity includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, institutional, and residential uses of varying heights. Notable uses to the west along San Vicente Boulevard include the 12-story Westbury Terrace condominium towers and Our Lady of Mount Lebanon-St. Peter Cathedral to the west, and uses to the north along 3rd Street include the 8-story Beverly Center and 8-story Cedars-Sinai Medical Center to the north and northwest, respectively. South of the project site along Burton Way is the 8500 Burton Way building, an eight-story mixed use condominium, which includes ground-floor commercial uses and seven-levels of residential uses. East of the project site is La Cienega Boulevard, a major north-south arterial road characterized by a mix of low to mid-rise commercial and office buildings.

The project would replace the existing three-story commercial building with a 20-story mixed-use building, with ground-floor commercial uses and residential units. The new building would be designed as a tower over a podium base. The base would consist of landscaping along the southern boundary of the site, common areas, commercial and retail uses, a lobby and parking levels, while the tower portion of the building would contain the residential units and amenity deck. There would be no setbacks provided as part of the proposed project. The majority of the building façade would consist of glass, with precast concrete overhangs defining each level. Other building materials would include terra cotta, plaster, aluminum, tile, metal, and prefinished metal. All glass building materials would be non-reflective or treated with a non-reflective coating in order to minimize glare. In addition to the new structure, a ground level plaza would be provided in the southern portion of the project site. The plaza would consist of a water fountain, pedestrian paths, and landscaped areas. The proposed project would be designed in a manner that is consistent with the urban form of the surrounding neighborhood and would include design features that would improve the visual character of the surroundings. Thus, the proposed project would not substantially degrade the existing visual character or quality of the project site and would result in less than significant impacts. No mitigation measures are proposed and this impact will not be discussed further in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project site is located in a highly urbanized area that is surrounded on the north, east, and south by multi-storied retail, residential, and commercial uses within the Wilshire Community Plan Area. The project vicinity currently generates moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting, vehicle headlights, interior lighting from surrounding land uses, and architectural lighting. During nighttime hours, surrounding mixed-use developments typically display moderate levels of interior and exterior lighting for way-finding, security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Traffic on local streets also contributes to high ambient light levels in the area. The proposed project would introduce new sources of nighttime illumination for architectural highlighting, parking, signage and security purposes, some of which may be visible from some nearby offsite vantages. In addition, with the introduction of a new high-rise building with a height taller than existing buildings in the surrounding area, there is a potential impact from shade and shadows. This potential impact will be discussed further in the EIR, as a matter of public interest. While light and glare and shade and shadow impacts from the proposed project are expected to be less than significant, they will be discussed further in the EIR as a matter of public interest.

Cumulative Aesthetics Impacts

Development of the proposed project in conjunction with the related projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Development of related projects is expected to occur in accordance with adopted plans and regulations. For impacts to scenic vistas, only those projects located within the same viewshed as the proposed project would have impacts that could contribute to a cumulative impact. The project site is located within an urban area and although it is possible to see views of the surrounding hills and mountains in the distance, the views are already intermittently blocked by existing buildings. Due to the existing compromised nature of these views and due to the extent of surrounding urban development which already partially or fully obstruct views of surrounding hills and mountains, other development in the area is not expected to result in a significant cumulative impact on a scenic vista. The geographic scope of projects impacting scenic resources would include those projects that will be visible along Burton Way from La Cienega Boulevard to Oakhurst Drive (two projects) and on San Vicente Boulevard between Pico Boulevard and La Cienega Boulevard (four projects). These projects propose residential, retail, and office uses that would generally be consistent with the surrounding development, and would be constructed in accordance with adopted plans. Thus, the cumulative impact to scenic resources would be less than significant. Furthermore, the proposed project would not substantially damage a scenic resource and, therefore, would not contribute to a cumulative impact.

2. Agricultural and Forest Resources

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

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

No Impact. The project site is located within a highly urbanized area and is currently developed with a three-story building (a vacant department store on the ground floor and three levels of parking above). No Farmland, agricultural uses, or related operations are present within the project site or surrounding area. According to the California Department of Conservation (CDC), pursuant to Farmland Mapping and Monitoring Program, there are no farmlands located within the vicinity of the project site.[4] Therefore, the project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, and no impact would occur and no mitigation measures would be necessary. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The project site is not zoned for agricultural use nor is it subject to a Williamson Act contract. According to the CDC, there is no land subject to a Williamson Act Contract within the vicinity of the project site.[5] Therefore, the proposed project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur. This topic will not be evaluated in the EIR and no mitigation measures would be required.

Significance: No impact.

[4] California Department of Conservation (CDC), 2012. Los Angeles County Important Farmlands. Accessed at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, on March 25, 2015.

[5] CDC, 2012. Los Angeles County Williamson Act FY 2012-2013. Accessed at ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_12_13_WA.pdf on March 25, 2015.

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

No Impact. The project site is currently developed with a three-story structure and located in a highly urbanized area with a zoning designation C2-1VL-O (Neighborhood Commercial); the site is not zoned as forest land or timberland.[6] Thus, the proposed project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur and no mitigation measures would be necessary. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. Refer to Response 2.c, above. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. As discussed above, the project site does not contain farmland, forest land, or timberland. Accordingly, the project would not result in the conversion of farmland to non-agricultural uses or forest land to non- forest uses. Therefore, no impacts would occur and no mitigation measures would be necessary. Therefore, this topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Agricultural and Forest Resources Impacts

Development of the proposed project in combination with the related projects would not result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the project site and the surrounding area are not included in the Important Farmland category.[7] The project site is in an area that is highly urbanized, and has a land use designation of Neighborhood Office Commercial. This area contains high-rise medical and office buildings, hotels, apartment towers, entertainment centers, and regional shopping complexes. This area does not include any state-designated agricultural lands or forest uses. Therefore, no cumulative impact on agricultural or forest resources would occur. This topic will not be evaluated in the EIR.

6 California Department of Conservation, *Los Angeles County Important Farmland 2012*, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, 2015, accessed December 14, 2015.

7 California Department of Conservation, *Los Angeles County Important Farmland 2012*, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, 2015, accessed December 14, 2015.

3. Air Quality

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. The analysis is based on the information provided in the project specific air quality and greenhouse gas technical study[8] as well as the project specific traffic study.[9] Would the project:

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

Less than Significant Impact. The proposed project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, SCAQMD's 2012 Air Quality Management Plan (AQMP)[10] is the applicable air quality plan and the City of Los Angeles County Metropolitan Authority's 2010 Congestion Management Program (CMP)[11] is the applicable congestion management plan for the proposed project. According to the 2010 CMP[12], projects that are consistent with the SCAQMD's 2012 AQMP would also be consistent with the County of Los Angeles' CMP. Therefore, if the proposed project is consistent with SCAQMD's 2012 AQMP, it would also be consistent with the County of Los Angeles' 2010 CMP.

Projects that are consistent with the regional population, housing, and employment forecasts identified by Southern California Association of Governments (SCAG) are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections, and thus also with the AQMP growth projections.

The project site is located within the Wilshire Community Plan area of the City of Los Angeles. The Wilshire Community Plan was developed to promote a diverse mix of land uses emphasizing higher density, mixed-use environment that will support transit- and pedestrian-oriented mobility strategies. The proposed project, which increases density and provides a mix of housing and retail

8 ESA, 2015. *333 South La Cienega Project Air Quality and Greenhouse Gas Emissions Technical Report*. April 2015.
9 The Mobility Group. 2015. 333 La Cienega Boulevard project Traffic Study. October 13, 2015.
10 South Coast Air Quality Management District (SCAQMD), 2013. Final 2012 AQMP. Accessed at www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan, on September 4, 2015.
11 Los Angeles County, 2010. 2010 Congestion Management Program. Accessed at http://media.metro.net/docs/cmp_final_2010.pdf, on December 15, 2015.
12 Los Angeles County, 2010. 2010 Congestion Management Program. Accessed at http://media.metro.net/docs/cmp_final_2010.pdf, on December 15, 2015. Page F-6.

uses in close proximity to transit, would be consistent with this objective of the Wilshire Community Plan.

In the 2012 Regional Transportation Plan (RTP), SCAG identified population growth in Los Angeles to increase from 3,770,500 in 2008 to 3,991,700 in 2020, an increase of 221,200 people by 2020.[13] The proposed project would have a population of 331 people, or less than one percent of the total anticipated increase. Therefore, the increase in population from the project is negligible and would be accounted for in the SCAG growth assumptions for the City. Additionally, SCAG identifies employment growth for the City as increasing from 1,735,200 in 2008 to 1,817,700 in 2020.[14] This is an increase in 82,500 jobs during this timeframe. The proposed project would result in an increase in 84 jobs within the City, less than one percent of the total anticipated employment increase. Therefore, the employment increase from the project is accounted for in the SCAG growth projections.

Because the proposed project is a permitted use under the Wilshire Community Plan and the employment and population growth resulting from the project would be consistent with SCAG's regional forecast projections, the proposed project would therefore be consistent with the growth projections accounted for in SCAQMD's AQMP. In addition, since the proposed project would be consistent with the SCAQMD's AQMP, the proposed project would also be consistent with the County of Los Angeles' CMP. Thus, the proposed project would not conflict with, or obstruct, implementation of the AQMP or CMP and this impact would be less than significant and no mitigation measures are required. Therefore, this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project site is located in the SCAB, which is a federal non-attainment area for ozone, particulate matter $(PM)_{2.5}$ and lead (Pb), and a state non-attainment area for ozone, PM_{10}, and $PM_{2.5}$. It is in attainment for, on the federal level, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and PM_{10}, and, on the state level, NO_2, SO_2, and Pb. The proposed project would involve the demolition of the existing onsite building and the construction of a 20-story building consisting of 145 residential units and 31,055 sf of commercial uses, including 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses, on approximately 1.15 acres. The project would result in increased air pollutant emission from the project site during construction (short-term) and increased air pollutant emissions during operation (long-term), as discussed below.

[13] Southern California Association of Governments (SCAG). 2012. *Adopted 2012 RTP Growth Forecast.* Accessed at http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting, on October 2015.

[14] Southern California Association of Governments (SCAG). 2012. Adopted 2012 RTP Growth Forecast. Accessed at http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting on October 2015.

Violation of Air Quality Standards – Construction

Construction activities associated with the proposed project would generate pollutant emissions from the following construction activities: (1) demolition, site preparation, grading, and excavation; (2) construction workers traveling to and from project site; (3) delivery and hauling of construction supplies to, and debris from, the project site; (4) fuel combustion by on-site construction equipment; and (5) building construction, application of architectural coatings, and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring simultaneously at the time.

It is mandatory for all construction projects in the SCAB to comply with SCAQMD Rule 403 for controlling fugitive dust. Incorporating Rule 403 into the proposed project would reduce regional PM_{10} and $PM_{2.5}$ emissions from construction activities. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling for the proposed project.

Table 1 summarizes the modeled peak daily emissions of criteria air pollutants and ozone precursors associated with the proposed project's worst-case construction schedule. The project's worst-case construction schedule would involve phase overlaps, including an overlap of the project's building and construction phase with the architectural coating phase, and the architectural coating phase with the paving phase. In addition, the pollutant emissions shown for the project's demolition phase in Table 1 takes into account the incorporation of the Project Design Feature (PDF) that requires all off-road construction equipment exceeding 50 hp used during the project's demolition phase to either meet, at a minimum, the U.S. Environmental Protection Agency (USEPA) Tier IV interim engine certification requirements, or apply other available technologies to the construction equipment that would achieve the same pollutant emissions reduction as USEPA Tier IV construction equipment. As shown in Table 1, the maximum daily construction emissions generated by the proposed project's worst-case construction scenario would not exceed the SCAQMD's daily significance threshold for any criteria pollutants during any of the construction phases, or phase overlaps. Therefore, construction emissions would have a less than significant impact related to regional air quality.

TABLE 1
PROPOSED REGIONAL CONSTRUCTION EMISSIONS[15]

	Estimated Maximum Daily Emissions (lbs/day)					
Construction Activities	**ROG**	**NO_X**	**ROG**	**SO_X**	**ROG**	**$PM_{2.5}$**
2016						
Demolition						
Fugitive Dust Emissions	-	-	-	-	0.37	0.06
Off-Road Emissions	1.97	21.70	28.74	0.05	0.80	0.80
On-Road Emissions	0.25	1.86	3.31	0.01	0.50	0.15
Total Emissions	**2.22**	**23.55**	**32.05**	**0.06**	**1.66**	**1.00**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
Site Preparation						
Fugitive Dust Emissions	-	-	-	-	1.95	1.07
Off-Road Emissions	0.71	6.83	5.08	0.01	0.39	0.36
On-Road Emissions	0.05	0.06	0.69	0.00	0.11	0.03
Total Emissions	**0.75**	**6.89**	**5.78**	**0.01**	**2.46**	**1.47**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
2017						
Site Preparation						
Fugitive Dust Emissions	-	-	-	-	1.95	1.07
Off-Road Emissions	0.66	6.30	5.06	0.01	0.36	0.33
On-Road Emissions	0.04	0.06	0.59	0.00	0.11	0.03
Total Emissions	**0.71**	**6.35**	**5.65**	**0.01**	**2.43**	**1.44**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
Grading						
Fugitive Dust Emissions	-	-	-	-	1.70	0.92
Off-Road Emissions	2.75	26.49	17.72	0.02	1.71	1.57
On-Road Emissions	1.62	27.29	17.60	0.08	2.06	0.93
Total Emissions	**4.37**	**53.78**	**35.32**	**0.10**	**3.77**	**2.50**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
Drainage/Utilities/Sub-Grade						
Fugitive Dust Emissions	-	-	-	-	1.67	0.92
Off-Road Emissions	0.43	3.76	3.00	0.00	0.26	0.24
On-Road Emissions	0.03	0.05	0.50	0.00	0.01	0.02

15 ESA, 2016. 333 South La Cienega project Air Quality and Greenhouse Gas Emissions Technical Report. January 2016.

TABLE 1
PROPOSED REGIONAL CONSTRUCTION EMISSIONS[15]

	Estimated Maximum Daily Emissions (lbs/day)					
Construction Activities	**ROG**	**NO_X**	**ROG**	**SO_X**	**ROG**	**$PM_{2.5}$**
Total Emissions	**0.46**	**3.81**	**3.50**	**0.01**	**0.27**	**0.26**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
Building Construction						
Off-Road Emissions	1.36	12.94	16.74	0.04	0.77	0.74
On-Road Emissions	1.28	5.38	18.51	2.47	2.55	0.73
Total Emissions	**2.64**	**18.33**	**35.25**	**2.51**	**3.32**	**1.47**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
2018						
Building Construction + Architectural Coating						
Off-Road Emissions	30.81	14.24	9.35	0.02	0.79	0.77
On-Road Emissions	1.25	4.72	136.41	0.04	2.99	0.85
Total Emissions	**32.06**	**18.97**	**145.76**	**0.06**	**3.78**	**1.62**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No
Architectural Coating + Paving						
Off-Road Emissions	30.76	15.23	12.37	0.02	0.82	0.77
On-Road Emissions	0.20	0.26	20.74	0.01	0.61	0.17
Total Emissions	**30.96**	**15.48**	**33.11**	**0.03**	**1.43**	**0.94**
Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Significant Impact?	No	No	No	No	No	No

NOTE: Construction emissions would be slightly different during the summer and winter seasons. Maximum daily emissions of ROG and NO_X would generally be higher during the winter while emissions of CO and SO_2 would generally be higher in the summer. The maximum emissions for each pollutant over the course of the summer and winter seasons are shown in this table.

Source: ESA CalEEMod Modeling January 2016

Violation of Air Quality Standards – Operation

Implementation of the proposed project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products, in addition to operational mobile emissions. According to the traffic study prepared for the project, development of the proposed residential building and removal of the existing uses at the project site uses would result in a net increase in 1,947 vehicle trips per day when compared to existing baseline conditions.

Operations emissions associated with the proposed project were modeled using the CalEEMod model. Model defaults were adjusted to reflect project-specific data, where available, including the size and type of the proposed land use. In addition, the operational emissions associated with the existing uses at the project site were also calculated in CalEEMod and the amount was subtracted from the project's total operational emissions amount to determine the net increase in operational emissions that would occur. Modeled operations emissions are presented in **Table 2**.

As shown in Table 2, the proposed project would result in long-term regional emissions of criteria air pollutants and ozone precursors that are below SCAQMD's applicable thresholds. Therefore, the project's operational emissions would not result in or substantially contribute to emissions concentrations that exceed the NAAQS and CAAQS and no mitigation would be required.

TABLE 2
PROPOSED PROJECT OPERATIONAL EMISSIONS[16]

	Estimated Emissions (lbs/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area Sources	8.86	0.14	12.08	0.00	0.24	8.86
Energy Sources	0.07	0.58	0.40	0.00	0.05	0.07
Mobile Sources	9.83	20.92	87.94	0.21	14.08	9.83
Total Project Emissions	18.75	21.64	100.42	0.22	14.37	18.75
Existing Uses						
Area Sources	1.25	0.00	0.01	0.00	0.00	0.00
Energy Sources	0.00	0.22	0.02	0.00	0.00	0.00
Mobile Sources	2.62	5.36	23.35	0.04	2.39	0.70
Total Existing Uses Emissions	3.87	5.58	23.37	0.04	2.39	0.71
Total Net Operational Emissions[a]	**14.89**	**16.06**	**77.04**	**0.18**	**11.97**	**3.54**
Regional Significance Threshold	*55*	*55*	*550*	*150*	*100*	*55*
Significant Impact?	No	No	No	No	No	No

[a] Total net operational emissions are the total emissions estimated from the proposed project minus the emissions eliminated from the removal of the existing onsite operations.

Source: ESA, 2016

Overall, the proposed project's regional construction and operational emissions would not exceed SCAQMD's applicable significance thresholds. As such, regional air quality impacts from project implementation would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

16 ESA. 2015. 333 South La Cienega project. Air Quality and Greenhouse Gas Emissions Technical Report. October.

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

Less than Significant Impact. The project site is located within the SCAB, which is considered the cumulative study area for air quality. The SCAB is in attainment for carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter that is 10 microns or less in diameter (PM_{10}) on the federal level, and NO_2, SO_2, and lead on the state level. The SCAB is a federal nonattainment area for ozone, particulate matter that is 2.5 microns or less in diameter ($PM_{2.5}$) and lead, and a state nonattainment area for ozone, PM_{10}, and $PM_{2.5}$. Because of the SCAB's nonattainment status for ozone, PM_{10}, and $PM_{2.5}$, cumulative development consisting of the proposed project along with other reasonably foreseeable future projects in the SCAB as a whole could violate an air quality standard or contribute to an existing or projected air quality violation.[17] Based on SCAQMD's cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. As shown in Table 1, the project's construction emissions would not exceed SCAQMD's daily thresholds during construction. Thus, because the proposed project's construction-period impact would be less than significant, the proposed project would not contribute to a significant cumulative impact, when considered with other projects.

In addition, the operational emissions associated with the proposed project would not exceed the SCAQMD's thresholds of significance for any of the criteria pollutants (see Table 2). Furthermore, the proposed project is consistent with SCAQMD's AQMP. Thus, the proposed project would not conflict with SCAQMD's air quality planning efforts for nonattainment pollutants and would not lead to a cumulatively considerable net increase in nonattainment pollutants during operations.

Overall, the proposed project's construction and operational emissions contribution to cumulative air quality impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are individuals who are considered more sensitive to air pollutants than others. Schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, elderly people, and the infirm are more susceptible to respiratory distress and other air quality-related health problems than the

[17] Although the SCAB is a federal nonattainment area for lead, the proposed project would not involve the development of any major lead emissions sources. As such, the proposed project would not contribute any lead emissions that would cumulatively considerable.

general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, with associated greater exposure to ambient air quality.

Currently, sensitive uses located in the project site vicinity include residential and hospital uses. Specifically, the Westbury Terrace condominium tower is located to the west, across San Vicente Boulevard; the Cedars-Sinai Medical Center is located to the northwest, across 3rd Street; a 8500 Burton Way residential condominium and retail building and other multi-family residential buildings are located to the south and southwest, respectively, across San Vicente Boulevard and Burton Way. Additionally, while one and two-story commercial/retail buildings are located to the east of the project site, across La Cienega Boulevard, both single- and multi-family residential uses are located farther east beyond those commercial uses.

CO Hotspots

The decrease in emissions of CO from vehicles has increased the number of vehicles that can idle at an intersection before CO impacts occur. Because of this the use of the LOS as an indicator for CO impacts has become obsolete. For this reason, several air districts, including the Bay Area Air Quality Management District (BAAQMD),[18] have adopted guidelines that focus on criteria other than Level of Service (LOS) and percentage traffic increase, and instead focus on total volumes and consistency with congestion management plans. For the purposes of this analysis, intersections that exceed the screening criteria of 24,000 vehicles per hour should conduct dispersion modeling[19] to determine the potential impact from the impacted intersections. Where the screening values are not exceeded, the project would be determined to be less than significant with respect to localized CO impacts as long as the project is consistent with the local congestion management plan.

Twenty-five local intersections were analyzed as part of the traffic study that was prepared for the proposed project. The "existing plus project" peak hour project conditions were evaluated against the screening level threshold of 24,000 vehicles per hour. Based on an analysis of the peak hourly traffic volumes for each of the study area intersections evaluated in the project's traffic study, it was determined that the maximum hourly traffic volumes would occur at the La Cienega Boulevard and Olympic Boulevard intersection. Specifically the "existing plus project" maximum traffic volumes at this intersection would be 7,289 and 7,022 vehicles per hour for the AM and PM peak hours, respectively. As the peak hour traffic volumes at all the study area intersections would be well below 24,000 vehicles per hour, CO emissions from these vehicles volumes would be less than significant.

Additionally, with regard to the proposed project's potential impacts on Congestion Management Program (CMP) monitoring locations, the project's traffic study analyzed the project impacts on nearby CMP monitoring stations for arterials and freeways as well as providing a CMP transit analysis. There are four CMP arterial monitoring stations located nearest to the project site. Out

[18] Bay Area Air Quality Management District (BAAQMD) 2009. *Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance*. October.

[19] Dispersion modeling is a mathematical simulation of emissions as they are transported throughout the atmosphere.

of these four, it was determined that the one arterial monitoring station located at the intersection of La Cienega Boulevard and Wilshire Boulevard would add 52 trips, which is above the 50 trip threshold for arterials. None of the other three arterial monitoring station locations would add more than 50 trips from the project. However, it was determined that the La Cienega Boulevard and Wilshire Boulevard intersection would operate at an LOS of E with a volume to capacity ratio (V/C) of 0.002 in the AM peak hour and operate at an LOS of F with a V/C ratio of 0.004 during the PM peak hour, both of which are below the CMP significance threshold of operating at an LOS of F with a V/C ratio greater than or equal to 0.02. Thus, even though the proposed project would at more than 50 trips at the intersection of La Cienega Boulevard and Wilshire Boulevard, it would still be under the CMP significance threshold of operating at an LOS of F with a V/C ratio greater than or equal to 0.02. As such, the project's traffic study determined that due to the number of trips at the four identified CMP intersections, as well as the LOS and V/C ratios at these intersections, there would be no significant arterial CMP impacts.

Additionally, with regards to the nearest freeway monitoring stations that are closest to the project site, the project's traffic study also determined that the maximum number of one way trips that would be added to any single freeway segment would be three trips, which is well below the 150 trip CMP threshold for freeways. Thus, the project would not cause any significant impacts to freeway operations.

The proposed project would add an additional 77 transit trips in the PM peak hour, with the highest direction volume of 43 (inbound) trips. According to the CMP, a significant impact would occur on the CMP system if the proposed project increases traffic demand by two percent. The proposed project traffic would increase traffic demand by approximately one percent, which is below the CMP significance threshold of two percent. Therefore, the proposed project would not create a significant impact for the transit system within the project area.

Given that the proposed project would not exceed the screening level intersection volumes and would not conflict with the local CMP, the CO emission impacts would be less than significant.

Localized Air Quality Impacts – Criteria Air Pollutants

Aside from regional air quality impacts, projects in the SCAB are also required to analyze local air quality impacts. SCAQMD has developed localized significance thresholds (LSTs) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and, thus, would not cause or contribute to localized air quality impacts.

The localized air quality thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by SCAQMD,[20] for receptor distances of 82, 164, 328, 656, and 1,640 feet were developed for use on projects that are less than or equal to 1 acres in size and are only applicable to the following criteria pollutants: NO_x,

[20] SCAQMD, 2003. Final Localized Significance Threshold Methodology for CEQA Evaluations. June. Revised July 2008.

CO, PM_{10}, and $PM_{2.5}$. The mass rate look-up tables for a 1-acre site are used to provide a screening-level evaluation of the proposed project's localized air quality impacts.[21]

The nearest sensitive receptor to the project site is a multi-family residential building located approximately 110 feet from the project site's western boundary. Since the nearest receptor to the project site is located approximately 110 feet away, the LSTs for a receptor distance of 82 feet are used to evaluate the potential localized air quality impacts associated with the proposed project's peak day emissions to present a conservative analysis. **Table 3** represents the screening levels for a receptor located 82 feet for a 1-acre site during construction and operations. Where the proposed project emissions would exceed the LSTs for a 1-acre site, then the emissions would have to be evaluated using dispersion modeling.

TABLE 3
SCAQMD LOCALIZED CONSTRUCTION AND OPERATIONAL SIGNIFICANCE THRESHOLDS AT A RECEPTOR LOCATED 82 FEET FOR A 1-ACRE SITE

Pollutant	LST for a Receptor Located 82 Feet for a 1-Acre Site Source Receptor Area (SRA) 1 (Central Los Angeles)	
	Allowable emissions (pounds/day)	
	Construction	Operational
Nitrogen Oxides (NO_x)[b]	74	74
Carbon Monoxide (CO)	680	680
Respirable Particulate Matter (PM_{10})	5	2
Fine Particulate Matter ($PM_{2.5}$)	3	1

SOURCE: SCAQMD, 2009.

The daily unmitigated on-site emissions generated during the project's worst-case construction scenario are presented in **Table 4**. It should be noted that the pollutant emissions calculated for the project's on-site demolition activities takes into account the incorporation of project design feature (PDF) 1, described in the Project Description and below, which requires all off-road construction equipment exceeding 50 hp used during the project's demolition phase to either meet, at a minimum, USEPA Tier IV interim engine certification requirements, or apply other available technologies to the construction equipment that would achieve the same pollutant emissions reduction as USEPA Tier IV construction equipment.

TABLE 4
PROPOSED PROJECT UNMITIGATED LOCALIZED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Estimated Maximum Daily On-Site Emissions (lbs/day)			
	NO_X	CO	PM_{10}[a]	$PM_{2.5}$[a]
2016	21.82	29.76	2.35	1.44
2017	28.45	26.10	3.43	2.51

21 According to SCAQMD's LST methodology, LSTs are only applicable to the onsite emissions that are generated by a project and do not apply to emissions generated offsite such as mobile emissions on roadways from worker, vendor, and haul truck trips.

Construction Phase	Estimated Maximum Daily On-Site Emissions (lbs/day)			
	NO_X	CO	PM_{10}[a]	$PM_{2.5}$[a]
2018	16.31	18.78	0.85	0.79
Highest Daily Construction Emissions	***28.45***	***29.76***	***3.43***	***2.51***
Localized Significance Threshold[b]	*74*	*680*	*5*	*3*
Significant Impact?	No	No	No	No

[a] Emissions account for implementation of dust control measures as required by SCAQMD Rule 403—Fugitive Dust.
[b] LSTs for a one-acre site in SRA 1 at a receptor distance of 82 feet.

Source: ESA, 2016

Project Design Feature:

> **Project Design Feature PDF-1**: During the demolition phase, all onsite equipment greater than 50 horsepower (hp) shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. As an alternative, the Applicant may opt to apply other available technologies to the construction equipment that would achieve a comparable reduction in PM emissions to that of Tier IV construction equipment. Where alternatives to USEPA Tier IV are chosen for the proposed project, the Applicant shall be required to show evidence to the City of Los Angeles that these alternative technologies would achieve comparable PM emissions reductions that are no less than what could be achieved by Tier IV construction equipment.

As shown in Table 4, the daily unmitigated emissions generated onsite by the project's worst-case construction scenario would not exceed any of the applicable SCAQMD LSTs for a one-acre site in SRA 1 during any of the construction years. As the project's worst-case construction emissions would not exceed SCAQMD's applicable LSTs, the localized air quality impacts associated with the project's construction emissions would be less than significant and no mitigation would be required.

During project operations, the daily amount of localized pollutant emissions generated onsite by the project would not be substantial, especially when taking into consideration that the onsite operational emissions associated with the existing uses would be displaced by those of the proposed project. The proposed project's net increase in onsite operational emissions is shown in **Table 5**.

TABLE 5
PROPOSED PROJECT LOCALIZED OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)			
Emissions Source	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project	6.40	54.42	0.78	0.44
Existing Uses	0.22	0.02	0.00	0.00
Total Net Operational Emissions	***6.18***	***54.40***	***0.78***	***0.44***
Localized Significance Threshold	74	680	1	1
Significant Impact?	No	No	No	No

Source: ESA, 2016

As shown in Table 5, the project's total net operational-related emissions generated onsite would not exceed SCAQMD's applicable operational LSTs. Thus, localized air quality impacts during project operations would be less than significant and no mitigation would be required.

Localized Air Quality Impacts – Toxic Air Contaminants (TACs)

Project construction would result in short-term emissions of diesel PM, which is a Toxic Air Contaminant (TAC). Diesel PM poses a carcinogenic health risk that is measured using an exposure period of 70 years. The exhaust of off-road heavy-duty diesel equipment would emit diesel PM during demolition, site preparation (e.g., clearing); site grading and excavation; paving; installation of utilities, materials transport and handling; building construction; and other miscellaneous activities. SCAQMD has not adopted a methodology for analyzing such impacts and has not recommended that health risk assessments be completed for construction-related emissions of TACs.

The construction period for the proposed project would be much less than the 70-year period used for risk determination (three years maximum construction). Because off-road heavy-duty diesel equipment would be used only for short time periods, project construction would not expose sensitive receptors to substantial emissions of TACs. According to the SCAQMD,[22] a maximum incremental cancer risk greater than or equal to 10 in 1 million or a chronic and acute hazard index greater than or equal to 1.0 would result in a significant impact.

Land uses that generate emissions of acutely and chronically hazardous TACs during operations typically include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The project operational activities would not include any of these potential sources, although minimal emissions may result from the use of consumer products. Additionally, it is not anticipated that an emergency back-up generator would be part of the project development. Emergency back-up generators usually run on diesel fuel and if allowed to run for long period of time, can emit large amounts of TACs. However, if a generator was implemented, it would typically only be used during emergencies and may be turned on periodically for

[22] SCAQMD, 2015. SCAQMD Air Quality Significance Thresholds. Accessed at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed on December 15, 2015.

maintenance and inspection purposes. Further, emergency back-up generators are subject to SCAQMD regulatory requirements, which limit the allowable emissions to a level below that which would result in a significant impact. As such, the periodic operation of the backup generator at the project site would not expose surrounding sensitive receptors to substantial pollutant or TAC emissions.

As the project is not located within the buffer distance of any major TAC-emitting facilities, including being within 500 feet of any freeway or major roadway with more than 100,000 vehicles per day, the proposed residential project is not anticipated to be adversely affected by proximity to exposure to diesel exhaust emissions. The nearest freeway to the project site is State Route 2 which is located more than 4,000 feet west of the project site. Therefore, TAC impacts are less than significant and this topic will not be discussed in the EIR.

Summary

CO emissions would not result in localized hotspots and, therefore, would result in a less than significant impact to localized sensitive receptors. Localized impacts associated with criteria pollutants from the project's construction and operational activities would not result in emissions above SCAQMD's localized pollutant thresholds and, therefore, would not expose receptors to substantial pollutant concentrations. TAC emissions from construction and operational activities would be minimal and would not have a substantial impact on nearby localized receptors. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and, therefore, this impact is less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. Land uses that are associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As a mixed-use development consisting of residential, retail, and restaurant uses, the proposed project does not include any of these uses that have been identified as being associated with odors. Thus, the proposed project is not expected to result in objectionable odors for the neighboring uses.

During construction of the proposed project, exhaust from equipment and activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors would be a temporary source of nuisance to adjacent uses, but would not affect a substantial number of people. As odors associated with project construction would be temporary and intermittent in nature, the odors would not be considered to be a significant environmental impact. Therefore, impacts associated with objectionable odors would be less than significant and will not be discussed in the EIR.

Significance: Less than significant.

Cumulative Air Quality Impacts

As discussed previously, the SCAB is considered the cumulative study area for air quality. Because of the SCAB's nonattainment status for ozone, PM_{10}, and $PM_{2.5}$, cumulative development consisting of the proposed project along with other reasonably foreseeable future projects in the SCAB as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. Based on SCAQMD's cumulative air quality impact methodology, an individual project that results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also result in a cumulatively considerable net increase of the criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. As discussed above under Section 3b., above, the project's pollutant emissions generated during the short-term construction activities and long-term operational activities would not exceed SCAQMD's applicable daily thresholds of significance. As described above under Impact c., because the proposed project's construction-period and operational impacts would be less than significant, the proposed project would not result in a significant cumulative impact from other projects because the proposed project would not exceed any of SCAQMD significance thresholds. Additionally, as described above under Impact a., the proposed project would also be consistent with SCAQMD's AQMP. Thus, the proposed project's contribution to cumulative air quality impacts would not be considerable, and would not conflict with SCAQMD's air quality planning efforts for nonattainment pollutants.

The nearest related project to the proposed project is located approximately 1,265 feet away at 316 North La Cienega Boulevard; however, at this time it is not known if the project would be constructed within the same time period as the proposed project. Nonetheless, under the condition where this project would be constructed concurrently with the proposed project, a sensitive receptor located equidistant from these two construction sites could be exposed to pollutant concentrations. However, a receptor located between the proposed project site and these two construction sites (i.e., a receptor located approximately 800 feet from the proposed project and the construction site located at 316 North La Cienega Boulevard, respectively) would be exposed to both construction emissions from the proposed project and would have a greater LSTs that would need to be exceeded before a potential localized air quality impact result. As discussed previously, the proposed project would not exceed the more stringent LSTs for receptors located 82 feet from the project site, compared to the LSTs for receptors located 656 or 1,640 feet from a project site, which are more representative of cumulatively impacted receptors. Therefore, it is not anticipated that the on-site emissions that could potentially be generated concurrently at the project site and the nearest related projects site would be of a magnitude that would exceed the LSTs for a receptor distance of 656 or 1,640 feet. As such, the cumulative impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

Similarly, odor impacts would only be cumulative if other projects were within 500 feet. Given that the nearest project is over 1,200 feet away, this topic will not be evaluated on a cumulative basis. Since the project does not have the potential to violate air quality standards and/or

contribute substantially to an existing or projected air quality violation, this topic will not be analyzed in the EIR.

4. Biological Resources

Would the project:

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

No Impact. The project site is located in an urbanized area of Los Angeles, primarily surrounded by retail, residential, and commercial land uses, and is currently occupied by a three-story building (a vacant department store on the ground floor and three levels of parking above). The project site contains non-native street trees and ornamental shrubs associated with the landscaping of a former retail land use. There are no native trees or habitat types located on the project site. A search of the California Natural Diversity Database (CNDDB) for the Beverly Hills quadrangle revealed that 12 special status species (seven animal and five plant species) occur within the project area. Of these 12 special status species, the CNDDB search concluded that none have the potential for occurrence at the project site.[23] Therefore, the project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). The proposed project would have no impact and no mitigation measures would be required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. As described in Section 4.a, above, the project site is located in a highly urbanized area and is developed with a three-story building and associated ornamental landscaping. Review of the U.S. Geological Survey 7.5 minute Beverly Hills quadrangle map revealed that there were no blue-line streams contained within the project site, nor is the project site located near a body of water or a river. Thus, the project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. Furthermore, the project site is not located in or adjacent to a Significant Ecological

[23] California Department of Fish and Wildlife. California Natural Diversity Database official website search. Accessed at http://www.dfg.ca.gov/biogeodata/cnddb/ on August 28, 2015.

Area (SEA) as defined by the City of Los Angeles.[24] As such, the project would have no impact on any riparian habitat or other sensitive natural community and no mitigation measures are required. Therefore, this topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. The U.S. Army Corps of Engineers (USACE) defines wetlands as an area that has the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes (e.g., "water-loving plants); (2) the substrate is predominantly undrained hydric (i.e., waterlogged soils); and (3) the substrate is saturated with or covered by shallow water at some time during the growing season. As described in Section 4.a, above, the project site is located in a highly urbanized area and is developed with a three-story building and associated ornamental landscaping. No wetlands are present at the project site and the site does not include hydrophytes (such as cattails, bulrushes, and mulefat) or other features that define a wetland. Therefore, the project would not have a substantial adverse effect on federally protected wetlands. There would be no impacts associated with project implementation and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

Less than Significant Impact. As described in Section 4.a, above, the project site is located in a highly urbanized area and is developed with a three-story building and associated ornamental landscaping. There are no potential or established resident or migratory wildlife corridors on the project site or in the vicinity due to the highly urbanized setting and lack of open space areas, particularly those areas that could facilitate the movement of wildlife species between larger stands of undeveloped habitat. Accordingly, the development of the project would not significantly impact any regional wildlife corridors or native wildlife nursery sites. Further, no water bodies that could serve as a habitat for fish exist on the project site or in the vicinity.

The federal Migratory Bird Treaty Act (MBTA) (16 USC, Sec. 703, Supp. 1, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. Native birds, their eggs, and nests, are also protected by Sections 3500 and 3800 of the California Fish and Game (CFG) Code, and thus impacts to native birds or their nests during the breeding season are potentially significant. The project site

[24] County of Los Angeles, 2014. *Significant Ecological Areas and Coastal Resource Areas* map. Accessed at http://planning.lacounty.gov/assets/upl/sea/SEA_adopted_proposed_2014.pdf, on September 2, 2015.

includes 20 non-native ornamental street trees located on and around the perimeter of the site, including Mexican fan palm (*washingtonia robusta*) (eight trees), Brisbane box (*tristania conferta*) (five trees), coral tree (*erythrina caffra*) (two trees), Sequoia (*sequoia sempervirens*) (three trees) and fig laurel (*ficus nitida*) (two trees). All these onsite trees would be removed with implementation of the proposed project. These trees could provide suitable nesting habitat for common avian species known to occur in urban environments that are protected under the MBTA.. However, the project would be required to comply with the MBTA and CFG Code to ensure that significant impacts to native and migratory birds would not occur in order to reduce the potential for impacts to migratory birds. With implementation of the regulations set forth in the MBTA, any potential impacts to native or migratory birds would be reduced to less a than significant impact. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project site is not located within any habitat conservation plan or natural community conservation plan, and the Wilshire Community Plan Area does not contain any policies protecting biological resources. However, the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the Los Angeles Municipal Code [LAMC]) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees (*juglans californica*), western sycamore trees (*platanus racemosa*) and California bay trees (*laurus nobilis*) of at least four inches in diameter at breast height. These tree species are considered "protected" by the City of Los Angeles. Native trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree . . ." and requires that all regulated protected trees that are removed be replaced on at least a two-to-one basis with trees that are of a protected variety. The City requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of proposed construction, and mitigation measures pursuant to the removal or replacement thereof. The project site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees.[25] Construction of the project would result in the removal of 20 trees located on the project site (six trees) and on the sidewalks around the perimeter of the site (14 trees), including Mexican fan palm (eight trees), Brisbane box (five trees), coral tree (two trees), Sequoia (three trees) and fig laurel (two trees); however, these trees are non-native and not protected under the City of Los Angeles Protected Tree Ordinance.

All trees located onsite are non-native and project implementation would not involve the removal of any protected or California native trees, nor would it conflict with any local policies or

[25] Rios Clementi Hale Studios, 2015. Existing Tree Plan. 333 La Cienega Boulevard. Los Angeles, CA 90048. October 6, 2015.

ordinances protecting biological resources. The removal of non-native street trees is considered a less than significant impact.

To expand and maintain the City's green canopy, per LAMC 12.21, G.2, there is a minimum requirement of one 24-inch planter box for every four units. Under this requirement, the proposed project is required to provide a total of 37 trees. The proposed project would exceed this requirement by providing 51 trees to replace the trees removed and to satisfy the requirements of the LAMC Section 12.21. Therefore, the proposed project would not conflict with any local policies or ordinances protection biological resources, and would be considered a less than significant impact. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

No Impact. The project site is located in a highly urbanized areas primarily surrounded by retail, residential and commercial land uses. As discussed in Section 4e., above, there are currently no habitat conservation plans, natural community conservation plans, or other approved local, regional or state habitat conservation plans applicable to the project site. No impact would occur and no further analysis or mitigation is required. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Biological Resources Impacts

Development of the proposed project in combination with the 53 related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS. No such habitat occurs in the vicinity of the project site or related projects due to the existing urban development. The proposed project is primarily surrounded by retail, residential and commercial land uses, and is currently occupied by a three-story building (a vacant department store on the ground floor and three levels of parking above). As discussed in Sections 4b and 4e, the project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. No wetlands are present at the project site and the site does not include hydrophytes (such as cattails, bulrushes, and mulefat) or other features that define a wetland. The 53 related projects are in the same highly-urbanized area as the project. Because neither the project nor the related projects impact such resources, there would be a less than significant cumulative impact. In addition, there are currently no habitat conservation plans, natural community conservation plans, or other approved local, regional or state habitat conservation plans applicable to the project site. Finally, the project would comply with the MBTA, as would the other related projects, and, thus, with implementation of those regulations any potential cumulative impacts to migratory birds would be less than significant.

As mentioned above, there are no native trees or habitat types located on the project site. The project site contains non-native street trees and ornamental shrubs associated with the landscaping of a former retail land use. As part of the project, 51 trees would be included in the design to meet the City requirements for replacement trees. Therefore, the proposed project would not conflict with the Protected Tree Ordinance. Each related project would also be required to comply with existing regulations. Thus, cumulative impacts to biological resources would be less than significant and no mitigation measures are required.

5. Cultural Resources

Would the project:

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

Less than Significant Impact. A records search for the project was conducted on August 4, 2014 by staff at the South Central Coastal Information Center (SCCIC) to identify historical resources in the project site and vicinity. One historical resource, Our Lady of Mount Lebanon-St. Peter Cathedral (P-19-189248), was identified as a result of the SCCIC records search and is located adjacent to (within 100 feet of) the project site.

The Our Lady of Mount Lebanon-St. Peter Cathedral building was constructed between 1937 and 1939 by an unknown architect and builder. The resource was recorded by URS Corporation (URS) in 2010 as a Spanish Colonial Revival-style (with Italian Renaissance ornamentation) church.[26] The church building is located at 8560 Burton Way, about 100 feet west of the project site and has frontage on the west side of San Vicente Boulevard. URS found the building eligible for listing in the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register) under Criterion C/3 as a "building that significantly embodies the distinctive characteristics of the Spanish Colonial (and Italian Renaissance-style ornamentation) architectural style."[27] Since this resource was found eligible for listing in the National Register and California Register, it is considered a historical resource under CEQA. However, no direct or indirect impacts are anticipated to this resource.

An impact would occur to the building if the project would result in a substantial adverse change in the significance of the building, which includes physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings. Since the building is not within nor immediately adjacent to the project site, it would not be physically affected or altered by construction of the project and no direct impacts would occur to this resource. Also, since the building is located approximately 100 feet west of San Vicente Boulevard, which is a major

26 URS Corporation (URS), 2010. Archaeological Site Record for P-19-189248, document on file at South Central Coastal Information Center. Fullerton, CA.
27 Ibid.

thoroughfare (110 feet wide)[28], the building would be buffered from any potential indirect impacts. Therefore, the proposed project would result in less than significant impacts to historical resources and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact with Mitigation Incorporated. The SCCIC records search results indicated that a total of 17 cultural resources studies have been conducted within a ½-mile radius of the project site. Approximately 25 percent of the records search radius has been previously subject to cultural resources surveys by professional archaeologists. Of the 17 previous investigations, none include any portion of the project site. No archaeological resources have been previously documented within the project site or a ½-mile radius.

Historic maps and aerial photographs were examined to assess the project site's archaeological sensitivity. Topographic maps suggest that the project site and vicinity was largely undeveloped prior to the 1920s.[29] The 1921 Santa Monica 30' topographic map depicts the Salt Lake Oil Fields within or adjacent to the project site and the Pacific Electric Railway running diagonally along present-day San Vicente Boulevard, just west of the project site[30]. A Sanborn Fire Insurance map dating to 1926 depicts the project site as undeveloped.[31] An aerial photograph dating to 1947 indicates that the project site had been partially developed with an L-shaped building in the northeast corner and 2 to 3 smaller buildings or structures in the southern tip of the project site. By 1948, a building spanning the width of the project site had been constructed south of and adjacent to the L-shaped building.[32] A Sanborn map dating to 1951 indicates that the L-shaped building housed a restaurant and six stores, and the adjacent building was a reinforced concrete and brick building that was used for furniture storage. An auto garage is depicted on the map south of the furniture storage building. The buildings/structures in the southern tip of the project site included, from north to south, an office, a "greasing" structure (possibly related to the adjacent Pacific Electric Railway), and a gas and oil structure.[33] By 1964, the southern tip of the project site had been cleared and a parking lot constructed in the northwest. The project site had attained its current configuration by 1999.

Given the amount of previous development within the majority of the project site, the potential for subsurface archaeological resources is considered low. However, since the project includes ground-disturbing activities of up to 19 feet below ground surface and since the project would include excavation in areas that have not been subject to substantial previous disturbance (such as

[28] City of Los Angeles, *Navigate LA* search, http://navigatela.lacity.org/navigatela/, accessed December 14, 2015
[29] U.S. Geological Survey (USGS), 1896. Geologic map of the Santa Monica 30' quadrangle. Los Angeles County, California. And USGS, 1902. Geologic map of the Santa Monica 30' quadrangle, Los Angeles County, California.
[30] USGS, 1921. Geologic map of the Santa Monica 30' quadrangle. Los Angeles County, California.
[31] Los Angeles Public Library (LAPL), 1926. Sanborn Fire Insurance Map. Accessed at http://www.lapl.org/.
[32] Historicaerials.com, 2014. Historic Aerial Photographs for the Years 1948, 1952, 1972, and 2005. Accessed at http://*www.historicaerials.com/ on August 28, 2014.*
[33] LAPL, 1951. Sanborn Fire Insurance Map. Accessed online at http://www.lapl.org/

the paved parking lot), the project has the potential to disturb previously unknown significant archaeological resources. Implementation of Mitigation Measure CUL-1 would ensure that potential impacts to any archaeological resources are less than significant.

Mitigation Measure:

> **Mitigation Measure CUL-1:** In the event of the unanticipated discovery of archaeological materials, the contractor shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery and notify the City of Los Angeles. The discovery shall be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of Interior's Professional Qualification Standards for Archaeology,[34] who is obtained by contacting the California Historical Resources Information System – South Central Coastal Information Center at California State University, Fullerton, or the Register of Professional Archaeologists. Construction shall not resume until the qualified archaeologist has conferred with the City of Los Angeles on the significance of the resource.
>
> If it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan (Plan) shall be prepared and implemented by a qualified archaeologist in consultation with the City of Los Angeles. The City of Los Angeles shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered. The Plan shall include provisions for the recovery and analysis of important data, reporting, and curation at an appropriate accredited facility. If a resource is determined to be a unique archaeological resource as defined in Section 21083.1(g), the provisions of Section 21083.2(b) shall apply.

With implementation of Mitigation Measure CUL-1, impacts associated with substantial adverse changes in the significance of archaeological resources as defined in State CEQA §15064.5 would be less than significant. Accordingly, this topic will not be evaluated in the EIR.

Significance: Less than significant with implementation of Mitigation Measure CUL-1.

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

[34] U.S. Department of the Interior, 2014 Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (As Amended and Annotated), http://www.nps.gov/history/local-law/arch_stnds_0.htm, accessed August 22, 2014.

Less than Significant Impact with Mitigation Incorporated. A paleontological database search for fossil localities and fossil-bearing sediments located within the project site and vicinity was requested on August 6, 2014 from the Natural History Museum of Los Angeles County (NHMLAC). Results of the paleontological resources records search indicated that surficial deposits within the project site consist of younger Quaternary Alluvium, derived as alluvial fan deposits from the Santa Monica Mountains to the north.[35] The younger Quaternary Alluvium deposits usually do not contain significant vertebrate fossils, at least in the uppermost layers; however, these deposits are underlain by older Quaternary deposits at relatively shallow depths that do contain significant vertebrate fossils. Below the older Quaternary Alluvium deposits are even older Quaternary deposits known as the Palos Verdes Sand.

A total of six localities (LACM 3176, 7669, 7671, 7672, 7673, and 7770) within the older Quaternary deposits have been recorded within the vicinity of the project site. The nearest vertebrate fossil locality from the older Quaternary deposits is LACM 7672, which is either located within the northwestern portion of the project site or immediately adjacent to it, near the intersection of 3rd Street and San Vicente Boulevard. This locality produced specimens of deer (*Cervidae*) and elephantoid (*Proboscidea*) at unknown depths during excavations for the Hollyhills Drain Project. Additional excavations for the Hollyhills Drain Project, immediately southeast of the project site, along San Vicente Boulevard between Colgate Avenue and Drexel Avenue, uncovered vertebrate fossil locality LACM 7671, which produced fossil specimens of mastodon at an unknown depth. Another vertebrate fossil locality uncovered during excavations for the Hollyhills Drain Project is LACM 7673, located north of the project site near the intersection of Rosewood Avenue and Westbourne Drive, which produced a specimen of horse (*Equus*) at an unknown depth. The last significant vertebrate fossils discovered during excavations for the Hollyhills Drain Project are LACM 7669 and LACM 7770, which are located a little farther to the south-southeast of the project site along San Vicente Boulevard near its intersection with Wilshire Boulevard and Orange Street that produced fossil specimens of ground sloth (*Xenarthra*), elephantoid (*Proboscidea*), and bison (*Bison*), also at an unknown depth. Lastly, located at the intersection of La Cienega Boulevard and Wilshire Boulevard, vertebrate fossil locality LACM 3176 produced fossil specimens of bison (*Bison*) at a depth of 30 feet below the surface.

There are also a great number of vertebrate fossil localities farther east and southeast of the project site (between 1 and 3 miles) at the famous Ranch La Brea deposits in Hancock Park and from Brea deposits in the surrounding area. However, these Brea deposits are not known to extend as far north or west as the project site. No known unique geologic features are located within the project site.

While excavation into the younger Quaternary Alluvium is unlikely to impact significant paleontological resources, any substantial excavation below the uppermost layers and into the underlying older Quaternary deposits and/or the Palos Verdes Sand deposits has a good chance of

[35] McLeod, Samuel A., 2014. Paleontological Resources for the Proposed 333 South La Cienega IS/MND Project, ESA Project #D140525.00, in the City of Los Angeles, Los Angeles County, prepared for ESA. August 6, 2014.

uncovering significant vertebrate fossil remains.[36] Numerous fossil Pleistocene (approximately 2.6 million years ago-11,000 years ago) localities have been documented within Los Angeles County from deposits similar to those underlying the project site.[37] Ice age animals recovered from these localities include, but are not limited to, mammoths, mastodons, horses, camels, ground sloths, and carnivores. Given that fossils localities have been previously documented within or immediately adjacent to the project site and several more have been documented within 0.50 mile of the project area in the same sediments that underlie the project site, the project site should be considered highly sensitive for presence of paleontological resources.

Excavations for the project would reach depths of at least 19 feet below the existing ground surface and have the potential to encounter significant vertebrate fossils. Previous depths of disturbance for the existing buildings is unknown, but were likely more shallow than proposed excavation since existing buildings do not include subterranean parking and the proposed project would include two levels of subterranean parking. Also, there are areas that have not been subject to substantial past ground disturbance, such as the paved parking lot. Therefore the project has the potential to result in a significant impact to unique paleontological resources. However, implementation of Mitigation Measures CUL-2 through CUL-4 would ensure that potential impacts to any unique paleontological resources are less than significant.

Mitigation Measure:

> **Mitigation Measure CUL-2**: Prior to start of earthmoving activities, a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards[38] shall be retained to conduct pre-construction worker paleontological resources sensitivity training. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site, procedures to be followed if they are found, pertinent laws protecting paleontological resources, and safety measures for working with paleontological monitors. The City of Los Angeles shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.
>
> **Mitigation Measure CUL-3**: The qualified paleontologist, or a paleontological monitor working under the direct supervision of the qualified paleontologist, shall monitor all ground-disturbing activity below a depth of three feet below the existing ground surface. The location, duration, and timing of monitoring shall be determined by the qualified paleontologist in consultation with the Applicant, and shall be based on a review of geologic maps and grading plans. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to safely and expediently recover the fossil specimens. Any significant fossils collected during project-related excavations shall

36 Ibid.
37 Jefferson, G.T. 1991. A catalogue of late Quaternary vertebrates from California: Part Two, mammals. Natural History Museum of Los Angeles County Technical Reports, No. 7.
38 Society of Vertebrate Paleontology, 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts To Paleontological Resources. Accessed at http://www.vertpaleo.org/Impact_Mitigation_Guidelines.htm on August 04, 2014.

be prepared to the point of identification, cataloged, and curated into an accredited repository with retrievable storage. The qualified paleontologist, based on observations of subsurface soil stratigraphy or other factors, may reduce or discontinue monitoring, as warranted, if the qualified paleontologist determines that the possibility of encountering fossiliferous deposits is low. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to be submitted to the City of Los Angeles and filed at the local repository. The final report should include but not be limited to an introduction of the project; methods; applicable laws, ordinances, regulations, and standards; institution/agency record search results; monitoring and mitigation results; and recommendations.

Mitigation Measure CUL-4: If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work or location, work within 50 feet of the discovery location shall cease until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment as required by CUL-3.

With implementation of Mitigation Measures CUL-2, CUL-3, and CUL-4, impacts to a unique paleontological resource or site or unique geologic feature would be less than significant. Accordingly, this topic will not be evaluated in the EIR.

Significance: Less than significant with implementation of Mitigation Measures CUL-2, CUL-3, and CUL-4.

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

Less than Significant Impact. The Native American Heritage Commission (NAHC) was contacted on August 3, 2014 to request a search of their Sacred Lands File. In a letter response dated August 14, 2014, the NAHC indicated that no Native American cultural resources or sacred sites (which typically include known burial sites) are known to exist within the project site or vicinity.[39] In addition, no known cemeteries or other burial places are known to exist within the project site and the proposed project is unlikely to disturb human remains. However, because the proposed project would involve earthmoving activities of up to 19 feet below ground surface and since the project would include excavation in areas that have not been subject to substantial previous disturbance (such as the paved parking lot), it is possible that such actions could unearth, expose, or disturb previously unknown human remains. With compliance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any project-related impacts to human remains would be less than significant.

Accordingly, this topic will not be evaluated in the EIR.

[39] Sanchez, Katy, NAHC Associate Government Program Analyst. 2014. Letter Re: Proposed 333 South La Cienega IS/MND Project – D140525.00, City of Los Angeles, Los Angeles County, prepared for ESA, August 14, 2014.

Significance: Less than significant.

e. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

Less than Significant with Mitigation Incorporated. As identified by Public Resources Code 21074, tribal resources are identified as:

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

As noted above, the NAHC has indicated that no sacred sites or Native American cultural resources are known to exist within the project site or vicinity. In addition, on December 10, 2015 the City of Los Angeles sent AB 52 consultation letters via certified mail to the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Gabrieleno) and the Soboba Band of Luiseno Indians (Soboba). The letter provided a project description and location, and invited the tribes to consult with the City of Los Angeles. The City of Los Angeles received written responses from the Kizh Gabrielino on December 28, 2015 and from the Soboba on January 8, 2015. The letters mentioned that due to the sensitivity of the area, the tribes would request a Native American monitor to be on the project site during ground disturbances. Therefore, with implementation of Mitigation Measure CUL-5, the project would result in a less-than-significant impact to tribal cultural resources as defined in Public Resources Code 21074. In addition, the City is continuing AB 52 consultation with the Kizh Gabrieleno to further identify tribal cultural resources that

could be impacted by the project and to develop adequate mitigation measures to reduce such impacts to a less than significant level. Accordingly, this topic will not be evaluated in the EIR.

Mitigation Measure:

> **Mitigation Measure CUL-5:** At least 30 days prior to the start of ground disturbance, the Applicant shall retain a Native American monitor listed on the Native American Heritage Commission contact list as traditionally and culturally affiliated with the project area to observe all ground-disturbing activities (including but not limited to pavement removal, potholing, auguring, boring, grading, excavation, and trenching). In the event that tribal cultural resources are encountered, the contractor shall immediately cease all work activities in the area (within approximately 50 feet) and notify the City of Los Angeles who will implement treatment measures identified during AB 52 consultation to reduce impacts to tribal cultural resources were they to occur as a result of a discovery. Construction shall not resume until treatment measure are implemented and concluded.

Significance: Less than significant.

Cumulative Cultural Resources Impacts

Although all of the related projects are located within an urban environment that has been previously disturbed, excavation activities associated with the related projects shown on Table A-1 and Figure A-17 could contribute to the progressive loss of paleontological or archaeological resources. Given the amount of previous development within the project site, the potential for subsurface archaeological resources in the project site is considered low. There is a higher potential for paleontological resources, however, since they may be encountered at depths below previous ground disturbance. Since the project includes ground-disturbing activities of up to 19 feet below ground surface and since the project would include excavation in areas that have not been subject to substantial previous disturbance (such as the paved parking lot), the project has the potential to disturb previously unknown significant archaeological resources or paleontological resources, and also has the potential for to unearth, expose, or disturb previously unknown human remains. Implementation of the above mitigation measures would ensure that potential impacts to any archaeological resources, paleontological resources, or human remains are less than significant. Implementation of the proposed project, in combination with the other related projects in the project site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. Each related project would be required to comply with existing regulations and undergo CEQA review to assure that any impacts are appropriately evaluated and, if necessary, mitigated. Therefore, any cumulative impact would be less than significant. The analysis of the proposed project's impacts to cultural resources concluded that the proposed project would have no significant impacts with respect to cultural resources following appropriate mitigation discussed above. Therefore, the proposed project's incremental contribution to a cumulative impact would not be considerable.

6. Geology and Soils

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

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

Less than Significant Impact. Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. Under the Alquist-Priolo Earthquake Fault Zoning Act, which was passed in 1972, the California State Geologist (CGS) identifies areas in the state that are at risk from surface fault rupture. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. This requires CGS to establish regulatory zones, known as Alquist Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps that identify these zones.

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a state-designated Alquist-Priolo Earthquake Fault Zone or other designated fault zone. Based on the information contained in the Geotechnical Constraints Review (geotechnical study) by Kleinfelder (see Appendix C to this Initial Study), the project site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface rupture.[40] Nor is the project site located within a City-designated Fault Rupture Study Area, as identified in the City of Los Angeles Safety Element of the General Plan[41]. Although surface fault rupture is not necessarily restricted to those delineated zones, they are considered to have the highest potential for rupture. No active faults are known to pass through the immediate project vicinity of the project site, and no active faults are located within an area close enough to the project site to be considered a concern for fault rupture.[42] The Hollywood Fault, an active fault within the Alquist-Priolo Earthquake Fault Zone, is approximately 1.44 miles north of the project site; however, given the distance, this fault would not result in surface rupture within the project site. Therefore, the potential impact from fault rupture would be less than significant. This topic will not be evaluated in the EIR.

40 California Department of Conservation (CDC), Special Studies Zones Beverly Hills Quadrangle, http://gmw.consrv.ca.gov/shmp/download/quad/BEVERLY_HILLS/maps/BEVHILLS.PDF, 1986, accessed March 26, 2015.

41 City of Los Angeles, 1995. General Plan, Safety Element Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas. Accessed at http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf on March 30, 2015.

42 Active faults are defined as those faults which show evidence of movement within the last 11,000 years (Holocene); potentially active faults are defined as those that have shown evidence of surface displacement over the last 1.6 million years (Quaternary).

Significance: Less than significant.

ii. Strong seismic ground shaking?

Less than Significant Impact. Ground shaking is an unavoidable hazard for buildings and structures in the Los Angeles Basin. The proposed project would likely experience at least one major earthquake (greater than 7.0 Mw) sometime during the operational life of the proposed project. Ground shaking during a major earthquake at the project site could cause structural damage to the proposed project. The degree of damage depends on the seismic hazards of the site and on the type of structure, its materials, and construction quality. The intensity of a damaging event would depend on the causative fault and the distance to the epicenter, the moment magnitude, and the duration of shaking. The proposed project is located approximately one mile south of the Hollywood Fault.[43] The project site would be subject to shaking during earthquake events. The level of ground shaking that would be experienced at the project site from the Hollywood Fault or any other active faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture and propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology.

Given the potential for strong seismic ground shaking, the proposed project would be constructed with latest construction materials and built to the requirements of the California Building Code (CBC) and, thus, would likely have the structural integrity to withstand strong seismic ground shaking. The CBC establishes minimum standards to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures within its jurisdiction. In addition, the CBC requires geotechnical investigations be conducted prior to construction of a project. The final choice of foundation design, site preparation requirements, and construction materials for the proposed project would be informed by soil and/or geotechnical engineering reports to be prepared prior to final designs, as required by Project Design Feature (PDF) 2. In addition to compliance with CBC, the proposed project would be subject to the provisions of the Seismic Hazards Mapping Act, which requires the implementation of feasible design measures that would be used to address seismic hazards, depending on the results of site-specific geotechnical studies. Required compliance with the CBC through the implementation of PDF-2 and compliance with the provisions of the Seismic Hazard Mapping Act would ensure that potential impacts from strong seismic ground shaking would be less than significant. Furthermore, the project design would be required to comply with state and City regulations for the protection of public safety Therefore, with incorporation of PDF-2, the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and impacts would be less than significant and no mitigation is required. This topic will not be evaluated further in the EIR.

[43] Kleinfelder, 2015. Geotechnical Constraints Review for 333 South La Cienega Boulevard, 2015 (see Appendix C).

Project Design Feature:

Project Design Feature PDF-2: Once the Applicant has prepared a site-specific, design-level geotechnical study for the proposed project to supplement the preliminary, predevelopment geotechnical investigation, the study will be reviewed by the City. The study shall be prepared by a registered geotechnical engineer and shall include recommendations applicable to foundation design, earthwork, shoring and site preparation that will minimize the effects of anticipated ground shaking and any other identified geologic hazards. The analysis shall include measures to reduce the potential to expose people or structures to the risk of loss, injury or death to acceptable levels as established in the CBC and City ordinances. The analyses shall be prepared in accordance with applicable City ordinances and policies and consistent with the most recent version of the California Building Code (CBC), Seismic Hazards Mapping Act, and Zone 4 requirements, which requires structural design that can mitigate potential risks from expansive soils, liquefaction hazards, and ground accelerations expected from known active faults to acceptable levels. The following measures designed to reduce the potential for liquefaction hazards would include, but not be limited to:

- Subsurface soil improvement, such as by removal and replacement of soil, compaction, or mixing;
- Deep foundations extending below the liquefiable layers;
- Mitigation for liquefaction hazards suggested in the CGS Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117A) including edge containment structures, removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicted displacements.

Implementation of these features, and those contained in the geotechnical report shall use proven methods, generally accepted by registered engineers, to reduce the risk for geologic hazards, such as those from ground-failure, liquefaction, and expansive soils.

Project plans for foundation design, earthwork, and site preparation shall incorporate all of the measures in the investigation. The City shall review and approve the investigation and recommended measures and shall require compliance with the recommended measures in the plans for grading, foundation, structural, and any other relevant building permits.

Significance: Less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a form of earthquake induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can

occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction.

The project site is located in an area considered to have high potential for liquefaction from seismic shaking (i.e., liquefiable area), as designated by the Los Angeles General Plan Safety Element.[44] In addition, according to mapping conducted by the California Geological Survey (CGS), the project area is also located in a Seismic Hazard Zone for liquefaction.[45] Thus, in the event of a large earthquake with a high acceleration of seismic shaking, the potential for liquefaction exists. Given this potential, if liquefiable soils are not taken into consideration in the design of proposed structure and during construction site preparation activities, liquefiable soils could have the potential to impact the structural components of the proposed project. While the potential for liquefaction exists, based on previous investigations on the project site and on for the neighboring 8500 Burton Way, the potential for such an event to occur is considered low.[46]

While the potential for liquefaction is considered low, the Applicant would still be required to prepare a site-specific, design-level geotechnical study for the project site prior to construction, as described above in PDF-2. For habitable structures, liquefaction hazards would be identified in the final geotechnical study and, if necessary, reduced in accordance with the standards and guidelines outlined by the CBC and the Seismic Hazard Mapping Act, specifically the provisions set forth in CGS's Special Publication 117A. Design measures that could be used to address seismic hazards and liquefaction, depending on the results of the site-specific geotechnical study, might include, but not be limited to, the removal and replacement of liquefiable soils, use of deep foundations, and/or soil compaction and mixing. Compliance with the CBC and the provisions set forth in CGS's Special Publication 117A would be ensured through the implementation of PDF-2. Therefore, adverse effects involving seismic-related ground failure, including liquefaction, would be less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

iv. Landslides?

No Impact. The project site is located in areas of relatively flat topography, with little likelihood of being subject to landslides or earthquake-induced landslides. Additionally, the project site is not located within a state-designated hazard zone for earthquake induced landsliding.[47] Therefore, the proposed project would not expose people or structures to potential substantial

44 City of Los Angeles, General Plan, Safety Element Exhibit B, *Areas Susceptible to Liquefaction*.
45 California Geological Survey (CGS), 1999. Beverly Hills Quadrangle. Accessed at http://gmw.consrv.ca.gov/shmp/download/quad/BEVERLY_HILLS/maps/ozn_bevh.pdf on March 30, 2015.
46 Kleinfelder, 2015. Geotechnical Constraints Review for 333 South La Cienega Boulevard, 2015 (See Appendix C).
47 California Department of Conservation (CDC), *State of California Seismic Hazard Zones, Beverly Hills Quadrangle*, http://gmw.consrv.ca.gov/shmp/download/quad/BEVERLY_HILLS/maps/ozn_bevh.pdf, 1999, accessed December 14, 2015.

adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur and no mitigation is required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

Less than Significant Impact. The project site is currently developed with a three-story building that covers the majority of the site. Since there is virtually no topsoil, the potential for the loss of topsoil during construction and operation is considered negligible.

During construction, the proposed project would include the excavation of two levels of subterranean parking and the export of excess soil. These types of construction activities have the potential to disturb and expose native soils to soil erosion. In addition, the change in onsite drainage patterns from project construction could also result in limited soil erosion. Thus, development of the proposed project has the potential to result in the erosion of soils during site preparation and construction activities. However, the potential for erosion during construction is limited and any potential erosion would be reduced by the implementation of stringent erosion control measures imposed by the City of Los Angeles Department of Building and Safety and the provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Implementation of these standards and requirements would ensure that impacts due to soil erosion or the loss of topsoil are limited. Furthermore, the Department of Building and Safety would be required to review the geotechnical study prepared as a part of PDF-2 and would issue a Soils Report Approval Letter which would contain requirements and standards designed to limit potential impacts to acceptable levels. Given that there is virtually no topsoil on the project site and the potential for erosion is limited, that the proposed project would implement LAMC's standards and requirements for grading and excavations during construction, and that the Applicant would implement any conditions that may be imposed by the City of Los Angeles Department of Building and Safety's Soils Report Approval Letter, a less than significant impact would occur with respect to erosion or the loss of topsoil during construction.

During operation, the proposed project would not have the potential to result in substantial soil erosion or loss of topsoil, as the project site would be nearly entirely developed with a building and paved. While there would be minimal landscaping, the majority of this area would be covered with grass, trees, and shrubs that would limit the amount of topsoil that is exposed. Thus, the potential for soil erosion during operation of the proposed project is extremely low. Therefore, impacts with regard to substantial soil erosion and loss of topsoil would be considered less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. Impacts related to liquefaction and landslides are addressed above in Section 6.a.iii and Section 6.a.iv, respectively. Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When the water is withdrawn, the sediments collapse in on itself. Based upon the criteria established in the by the City's *L.A. CEQA Thresholds Guide*,[48] a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. According to the geotechnical study,[49] soil conditions on the project site are generally favorable for foundations, as well as for permanent retaining structures, which would bind soil between two different elevations. Therefore, impacts related to the stability of the soil and geology would be less than significant. In addition, the construction of the proposed project would be required to comply with the City of Los Angeles Uniform Building Code (Building Code), which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. Compliance with the Building Code would ensure that potential impacts from lateral spreading, subsidence, liquefaction, or collapse would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. Based on previous investigations, near surface soils at the site and in the vicinity of the project site consist generally of interbedded silty sand, clayey sand, silty to sandy clay, lean to fat clay, and silt to sandy silt, some of which can be characterized as having potential for medium to high expansion.[50] The two borings that previously occurred on the project site identified zones of silty to sandy clay and clayey silt characterized as non-expansive to moderately expansive, with interbedded zones of silty to clayey sand and the potential for expansive soils was considered low.[51]

During site preparation activities, near surface soils would be removed and reworked using an imported engineered soil which would be imported to replace existing expansive soils.

48 City of Los Angeles, 2006. *L.A. CEQA Thresholds Guide*.
49 Kleinfelder, 2015. Geotechnical Constraints Review for 333 South La Cienega Boulevard, 2015 (see Appendix C).
50 Kleinfelder, 2015. Geotechnical Constraints Review for 333 South La Cienega Boulevard, 2015 (see Appendix C).
51 Ibid.

Replacement of these soils would ensure that impacts associated with expansive soils would be less than significant and that the proposed project would not create a substantial risk to life or property. Therefore, with incorporation of project requirement PDF-2 and adherence to the CBC, the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and impacts would be less than significant and no mitigation is required. Therefore, this topic will not be evaluated further in the EIR.

Significance: Less than significant.

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

No Impact. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative waste disposal systems. Therefore, no impact would occur and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Geology and Soils Impacts

Impacts related to geology are generally localized or site-specific, because each project site has a different set of geologic considerations that would be subject to specific site development and construction standards. As such, the potential for cumulative impacts to occur is geographically limited for many impact discussions. Similar to the proposed project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures.

The analysis of the proposed project's geology and soils impacts concluded that there are no active faults in the project area or close enough to the project site to be considered a concern for fault rupture, nor is the project site located within a state-designated hazard zone for earthquake induced landslides. Thus, impacts related to fault rupture and landslides would be less than significant. As described above, the proposed project has the potential to expose persons or structures to geologic hazards including strong seismic shaking and liquefaction. However, impacts associated with these topics were determined to be less than significant because the existing regulatory framework controlling the design and construction of structures in California was determined to be sufficient to avoid or substantially reduce the potential impacts. Furthermore, the proposed project would implement PDF-2, which requires the preparation of a site-specific, design-level geotechnical study for the project site and would include design measures that would be used to address seismic and liquefaction hazards. Therefore, since the proposed project would be designed in accordance with seismic design criteria as required by the CBC and Seismic Hazard Mapping Act, and would include the implementation of PDF-2 project impacts with regard to geology and soils be less than significant. While the loss of topsoil could

result in erosion impacts, there is virtually no topsoil on the project site and the project would be required to implement LAMC's standards and requirements for grading and excavations during construction. Thus, the potential for the proposed project to result in soil erosion or the loss of topsoil is considered negligible and there would be no impact. Given that the project site contains favorable conditions for foundations and that the project would be required to comply with the Building Code, the potential impacts from lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. Furthermore, the project site is located in a highly urbanized area and would connect to existing wastewater infrastructure; thus, there would be no need to use septic tanks or alternative waste disposal systems and there would be no impact. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the cumulative geology and soil impacts described herein would be less than significant. Accordingly, no mitigation measures are required and these topics will not be evaluated in the EIR.

7. Greenhouse Gas Emissions

Would the project:

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

Less than Significant Impact. The proposed project would generate greenhouse gas (GHG) emissions from a variety of sources. First, GHG emissions would be generated during construction of the project from the operation of construction equipment along with worker and vendor trips. Once fully operational, the project's operations would generate GHG emissions from both area sources and mobile sources. Indirect source emissions generated by the project include electrical consumption, water and wastewater usage (transportation), and solid waste disposal. Mobile (direct) sources of air pollutants associated with the proposed project would consist of motor vehicles trips generated by residents and patrons of the retail and restaurant uses. SCAQMD staff is convening an ongoing GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies and representatives from various stakeholder groups. In October 2008, the Working Group identified a tiered approach for determining the significance of GHG emissions, but the approach has not been formally adopted by the SCAQMD board.

Currently, while SCAQMD has issued proposed standards and guidelines related to some land uses, there is no adopted state or local standard for determining the cumulative significance of the proposed project's GHG emissions on global climate change. However, the SCAQMD has adopted a threshold of 10,000 MT/year CO_{2e} for industrial projects for which it is the lead agency and has proposed (but not yet adopted) a 3,000 MT/year CO_{2e} threshold for mixed use developments, a 3,500 MT/year CO_{2e} threshold for residential developments, and a 1,400

MT/year CO_{2e} threshold for commercial developments. [52] Accordingly, because the proposed project is categorized as a mixed use development, this analysis relies on a threshold of 3,000 MT/year CO_{2e} to determine whether the proposed project would result in a significant impact related to GHG emissions. SCAQMD's justification for recommending 3,000 MT CO_{2e} per year as a significance threshold is based on a comparison of emission reductions included in CARB's Scoping Plan to those achievable in the South Coast Air Basin from CEQA projects.[53] Thus, the use of this threshold is consistent with the requirements specified by the California Supreme Court's Newhall Ranch decision.[54]

Short-term construction-generated green GHG emissions associated with the proposed project were modeled using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2, as recommended by SCAQMD. Modeling was based on project-specific data provided by the Applicant, where available. Where project-specific information was not available, reasonable assumptions based on other similar projects and default model settings were used to estimate criteria air pollutant and ozone precursor emissions. Modeling input and output files are provided in Appendix A of the Air Quality and Greenhouse Gas Emissions Technical Report.[55]

Long-term (i.e., operational) regional emissions of GHG associated with the proposed project, including mobile- and area-source emissions, were also quantified using the CalEEMod computer model. Area-source emissions, which are widely distributed and made of many small emissions sources (e.g., building heating and cooling units, landscaping equipment, consumer products, painting operations, etc.), were modeled according to the size and type of land use proposed. Mass mobile-source emissions were modeled based on the daily vehicle trips that would result from the proposed project. Project trip generation rates were obtained from the project's traffic study.[56] In addition, as the project site is currently occupied by a commercial building and parking lot that would be removed as part of the project, the operational GHG emissions that were being generated by these existing uses would also be displaced by the project. As such, to evaluate the net increase in operational GHG emissions generated by the proposed project, the operational GHG emissions associated with the existing uses at the site were also calculated and the amount was subtracted from the project's total operational GHG emissions amount. The resulting net increase in long-term operational GHG emissions that would be generated by the proposed project was then compared to the SCAQMD's 3,000 $MTCO_{2e}$ per year GHG significance threshold for mixed used developments.

The project's total estimated GHG emissions during construction would be approximately 1,194 $MTCO_2e$. This would equal to approximately 39.8 $MTCO_2e$ per year after amortization over 30

[52] South Coast Air Quality Management District (SCAQMD), 2009. Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #14. November 19. [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds].

[53] SCAQMD. 2008b. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. October.

[54] [11/30/2015 California Supreme Court decision, Center for Biological Diversity, et al. v. Department of Fish and Game (Newhall Land Farming Company, aka Newhall Ranch) (2d Dist. 2014) 224 Cal.App.4th 1105 (Supreme Ct., Case No. S217763)]

[55] ESA, 2015. 333 South La Cienega Project Air Quality and Greenhouse Gas Emissions Technical Report. April 2015.

[56] The Mobility Group. 2015. 333 La Cienega Boulevard Project Traffic Study. March 17, 2015.

years per SCAQMD methodology. In accordance with SCAQMD's recommendation, the project's amortized construction-related GHG emissions are added to the operational emissions estimate in order to determine the project's total annual GHG emissions.

The proposed project's total net operational GHG emissions would be approximately 2,570 $MTCO_2e$ annually. Combined with the amortized construction emissions, the project's total annual GHG emissions, which includes the combined construction and operational (direct and indirect) GHG emissions, would be approximately 2,609.33 $MTCO_2e$ per year (detailed calculations are included in Appendix A).[57] The proposed project would not exceed SCAQMD's proposed screening level of 3,000 $MTCO_2e$ per year for mixed-use projects. Therefore, the net increase in GHG emissions resulting from project implementation is considered to be less than significant and this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project's compliance with applicable plans, policies, and regulations are discussed below.

Consistency with CARB Scoping Plan

In 2005, Governor Arnold Schwarzenegger issued Executive Order S-3-05 that stablished GHG emission reduction targets for California. The Executive Order required GHG reductions to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Later, in September 2006, Governor Schwarzenegger signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 established regulatory, reporting, and market mechanisms to achieve quantifiable GHG emission reductions and a climate action plan (CAP) on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction is to be accomplished through an enforceable statewide CAP on GHG emissions that was to be phased in starting in 2012. To effectively implement the CAP, AB 32 directs the California Air Resources Board (CARB) to develop and implement regulations to reduce statewide GHG emissions from stationary sources.

In December 2008, CARB approved the AB 32 Scoping Plan outlining the state's strategy to achieve the 2020 GHG emissions limit.[58] This Scoping Plan, developed by CARB in coordination with the Climate Action Team (CAT), proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health.

[57] ESA, 2015. 333 South LA Cienega Project Air Quality and Greenhouse Gas Emissions Technical Report. April 2015.

[58] CARB, 2009. Climate Change Scoping Plan: A Framework for Change, available online: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf; published December 2008, amended version included errata and Board requested modifications posted May 11, 2009.

As required by AB 32, the Scoping Plan must be updated at least every five years to evaluate the mix of AB 32 policies to ensure that California is on track to meet the targets set out in the legislation. In October 2013, a draft Update to the initial Scoping Plan was developed by CARB in collaboration with the California Climate Action Team (CCAT). The draft Update builds upon the initial Scoping Plan with new strategies and expanded measures, and identifies opportunities to leverage existing and new funds to drive GHG emission reductions through strategic planning and targeted program investments. The draft Update to the initial Scoping Plan was presented to CARB's Board for discussion at its February 20, 2014 meeting. Subsequently, the first update to the AB 32 Scoping Plan was approved on May 22, 2014 by CARB.

As part of the update to the Scoping Plan, the emissions reductions required to meet the 2020 statewide GHG emissions limit were further adjusted. The primary reason for adjusting the 2020 statewide emissions limit was based on the fact that the original Scoping Plan relied on the Intergovernmental Panel on Climate Change's (IPCC) 1996 Second Assessment Report (SAR) to assign the global warming potentials (GWPs) of greenhouse gases. Recently, in accordance the United Nations Framework Convention on Climate Change (UNFCCC), international climate agencies have agreed to begin using the scientifically updated GWP values in the IPCC's Fourth Assessment Report (AR4) that was released in 2007. Because CARB has begun to transition to the use of the AR4 100-year GWPs in its climate change programs, CARB recalculated the Scoping Plan's 1990 GHG emissions level with the AR4 GWPs. As the recalculation resulted in 431 $MMTCO_2e$, the 2020 GHG emissions limit established in response to AB 32 is now slightly higher than the 427 $MMTCO_2e$ in the initial Scoping Plan. Considering that the proposed update also adjusted the 2020 BAU forecast of GHG emissions to 509 $MMTCO_2e$, a 15 percent reduction below the estimated BAU levels was determined to be necessary to return to 1990 levels by 2020.[59]

Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the project would be Actions E-1 (increased Utility Energy efficiency programs including more stringent building and appliance standards), GB-1 (Green building), and W-1 (Increased water use efficiency). CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aims to reduce electricity demand by increased efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards, while Action W-1 aims to promote water use efficiency.

The proposed project would be designed to comply with the City's Los Angeles Green Building Code and the CALGreen Code to ensure that the proposed project uses resources (energy, water, etc.) efficiently and significantly reduce pollution and waste. As such, compliance with the Green Building Code would result in reductions in energy and water consumption equal to or in excess of the CALGreen Code requirements. Therefore, the proposed project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

[59] CARB. 2014. Proposed First Update to the Climate Change Scoping Plan: Building on the Framework. February.

Consistency with Green LA Plan

The Green LA Plan and associated Climate LA Program Document consist of a progressive list of environmental initiatives for the City to take in order to become a sustainable and green community. The initiatives contained in the Green LA Plan include reducing GHG emissions to 35 percent below 1990 levels by 2030, increasing the City's use of renewable energy, reducing the City's peak electric load, and advancing development that enhances the pedestrian and transit environment. The project, which would be subject to the building requirements of both the CALGreen Code and the City's Green Building Code, would support the City's effort of reducing GHG emissions. For example, the project's location close to transit reduces estimated daily trips by 15 percent. Thus, the project would be consistent with the Green LA Plan's efforts to enhance the pedestrian and transit environment. Overall, development of the project would be consistent with the Green LA Plan. In addition, even though the proposed project would not pursue certification with the Leaders in Energy and Environmental Design (LEED),[60] the proposed project would include certain LEED design features as part of its final design to further reduce GHG emissions.

Therefore, as implementation of the proposed project would not hinder or adversely affect the statewide attainment of GHG emission reduction goals of AB 32, this impact would be less than significant and mitigation measures are not required. This topic will not be evaluated in the EIR.

Consistency with the SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008, Governor Schwarzenegger approved Senate Bill (SB) 375, the Sustainable Communities and Climate Protection act of 2008. SB 375 encourages housing and transportation planning on a regional scale, in a manner designed to reduce vehicle use and associated GHG emissions. As required under this law, CARB has assigned regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. The targets apply to the regions in the State covered by the 18 Metropolitan Planning Organizations (MPOs), including the Sacramento Regional Council of Governments (SACOG) in the Sacramento region. If MPOs do not meet the GHG reduction targets, transportation projects will not be eligible for funding programmed after January 1, 2012. CARB adopted regional reduction targets in 2010. For the SACOG area, the adopted reduction targets call for a 7% reduction by 2020 and a 16% reduction by 2025.

SB 375 also requires each MPO to include a Sustainable Communities Strategy (SCS) in their Regional Transportation Plan. The SCS must set forth a vision for growth for the region while taking into account transportation, housing, environmental, and economic needs. The SCS will be the blueprint by which the region will meet its GHG emissions reductions target if there is a feasible way to do so.

On April 4, 2012, SCAG adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. SCAG has placed a greater emphasis than ever on sustainability and integrated planning in the 2012–2035 RTP/SCS. The

[60] LEED, or Leadership in Energy & Environmental Design, is a green building certification program that recognizes best-in-class building strategies and practices.

2012–2035 RTP/SCS vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability. The 2012–2035 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act. The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around.[61]

In the 2012 RTP/SCS, SCAG provides regional growth management strategies that target per capita GHG reduction from passenger vehicles and light duty trucks in the Southern California region. The 2012 RTP/SCS incorporates local land use development projections and circulation networks in city and county general plans. As discussed previously, SCAG identified population growth in Los Angeles to increase from 3,770,500 in 2008 to 3,991,700 in 2020, an increase of 221,200 people by 2020 in its 2012 RTP (SCAG, 2012). The proposed project would have a population of 326 people, or less than 0.2 percent of the total anticipated increase. Therefore, the projected increase in population from the proposed project would not hinder the 2012 RTP/SCS' vehicular travel related GHG emission reduction per capita goal nor prevent SCAG from achieving the sub regional GHG reduction per capita targets for the SCAG region.

In addition, the proposed project would support and be consistent with relevant and applicable GHG emission reduction strategies in SCAG's Sustainable Communities Strategy. These strategies include providing residences, shopping, and restaurant services in an urban infill location within a relatively short distance of existing transit stops and providing employment near current stops and neighborhood commercial centers. In addition, it is likely that the proposed project would support alternative and electric vehicles via the installation of on-site electric vehicle charging stations. Implementation of the proposed project would not hinder or adversely affect SCAG regional growth management strategies. This impact would be less than significant.

Significance: Less than significant.

Cumulative Greenhouse Gas Emissions Impacts

The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. GHG keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, which is absorbed by the GHG's in the atmosphere preventing it from escaping into space. This raises the temperature of the atmosphere and the Earth's surface. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of

[61] Southern California Association of Governments (SCAG), 2012. *Regional Transportation Plan 2012 – 2035 Sustainable Communities Strategy Towards a Sustainable Future*. Adopted April 2012.

Earth.[62] Construction and operation of the proposed project would incrementally contribute to GHG emissions along with past, present, and future activities. Nonetheless, this analysis focuses on GHG emissions more locally within the SCAQMD in order to avoid diluting the potential significance of proposed project-related emissions within the larger, global context. The proposed project would not conflict with the state's GHG reduction goals, and so could not cause or contribute to any cumulative effect in this regard. The CEQA Guidelines acknowledge this as a cumulative impact. Therefore, impacts addressed in this section for the proposed project reflect the cumulative analysis. The SCAQMD has adopted a threshold of 10,000 MT/year CO_{2e} for industrial projects for which it is the lead agency and has proposed (but not yet adopted) a 3,000 MT/year CO_{2e} threshold for mixed use developments, a 3,500 MT/year CO_{2e} threshold for residential developments, and a 1,400 MT/year CO_{2e} threshold for commercial developments. [63] Accordingly, because the proposed project is categorized as a mixed use development, this analysis relies on a threshold of 3,000 MT/year CO_{2e} to determine whether the proposed project would result in a significant impact related to GHG emissions. Therefore, the resulting net increase in long-term operational GHG emissions that would be generated by the proposed project was compared to the SCQAMD's 3,000 $MTCO_{2e}$ per year GHG significance threshold for mixed used developments.

As discussed above under impact 7a., the proposed project would result in a less-than-significant impact related to short-term GHG emissions during construction and long-term GHG emissions that cumulatively would not exceed the SCAQMD GHG threshold. This analysis assumes that all of the cumulative projects could contribute to global warming due to the generation of short-term and/or long-term GHG emissions. If GHG emissions continue globally such that climate change results in the impacts, the overall global cumulative impact would be significant and adverse. However, based on the SCAQMD threshold, the contributions of the proposed project to such an impact would not be cumulatively considerable.

Implementation of the proposed project would be consistent with both the CARB Scoping Plan as well as the Green LA Plan, as detailed above in Section 7b. Therefore, the project would not hinder or adversely affect the statewide attainment of GHG emission reduction goals of AB 32. This impact would be less than cumulatively considerable.

8. Hazards and Hazardous Materials

The following analysis is based, in part, on the Phase I *Environmental Site Assessment*, prepared for the project by Tetra Tech, April 29, 2015. The Phase I *Environmental Site Assessment* was prepared for the project to identify recognized environmental conditions and certain potential

[62] Center for Climate and Energy Solutions (CCES). 2015. The Greenhouse Effect. [http://www.c2es.org/facts-figures/basics/greenhouse-effect] Accessed December 15, 2015.

[63] South Coast Air Quality Management District (SCAQMD), 2009. Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #14. November 19. [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds].

environmental conditions on the project site. The Phase I *Environmental Site Assessment* is included as Appendix D, of this Initial Study.

Would the project:

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

Less than Significant Impact. The project involves the construction of a mixed-use, high-rise retail, restaurant, and residential development. Grading and construction activities would require the use of equipment, such as trucks, excavators, and other powered equipment, and would therefore use fuels (gasoline or diesel) and lubricants (oils and greases). The use of hazardous materials and substances during construction would be subject to the federal, state, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials. With compliance with these regulations, hazardous material impacts related to construction activities would be less than significant.

During operation, the project could potentially involve the use and storage of ordinary household or general commercial cleaners, solvents, pesticides for landscaping, petroleum products, and other substances utilized for cleaning and maintenance of retail and residential facilities. These types of chemicals are not considered acutely hazardous, and would be used in limited quantities. It is not anticipated, due to the nature of the allowable uses, that the future uses would be associated with industrial activities or disposal of hazardous materials in reportable quantities. Furthermore, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with federal, state, and local health and safety standards and regulations, including the Federal Resource Conservation and Recovery Act (RCRA), Title 49 of the Code of Federal Regulations (CFR), California Vehicle Code and the California Health and Safety Code. The RCRA establishes a framework for a national system of solid waste control, including hazard and nonhazardous waste and sets minimum federal criteria for the operation of waste landfills and ensures that hazardous waste is managed safely from the moment it is generated to its final disposal. Title 49 of the CFR and Section 9 of the California Vehicle Code establishes guidelines for the safe transportation of hazardous materials, and Section 2550 of the California Health and Safety Code establishes the requirement of business and area plans as a part of a statewide environmental reporting system for the handling and release of hazardous materials. Compliance with these standards and regulations would ensure that the proposed project would not result in significant impacts to the public or environment from the routine transport, use, or disposal of hazardous materials. Thus, impacts would be less than significant and no mitigation measures would be required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant with Mitigation Incorporated. Construction and operational activities of the proposed project would require the use of some hazardous materials such as fuels, oils, paints, solvents, and glues. All potentially hazardous materials used during construction or operation of the proposed project would be handled, stored, and disposed of in accordance with the manufacturers' specifications and applicable regulations. Nonetheless, during construction, there is the possibility of the inadvertent exposure or release of hazardous materials into the surrounding environment, which could inadvertently impact the soils, surface waters, or groundwater quality. The following analysis describes the potential impact of hazards and hazardous materials during construction and operational activities.

Construction

Construction activities required for implementation of the proposed project would involve trenching, excavation, grading, and other ground-disturbing activities. The proposed construction activities would require the use of equipment, such as trucks, excavators, and other powered equipment, and would use potentially hazardous materials such as fuels (gasoline or diesel) and lubricants (oils and greases). In addition, construction of the structure may use hazardous materials such as glues, solvents, paints, thinners, or other chemicals. Reasonably foreseeable upset and accident conditions could occur involving the release of hazardous materials during the construction of the proposed project, which could be an adverse impact to workers and/or the environment during construction activities.

Operational

Operations of the proposed project would consist of the typical common activities associated with development of residential, associated amenities (e.g., spa, swimming pool), restaurant and commercial uses. Household and landscape maintenance materials such as cleaning supplies, paints, oil, grease, fertilizers, and chlorine would be used during project operations. The use of most of these materials would be in small quantities and in accordance federal, state, and local regulations for transport, use, storage, and disposal of such materials. Therefore, operation of the proposed 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.

In addition, all potentially hazardous materials would be used and stored in accordance with manufacturers' instruction and handled in compliance with federal, state, and local regulations. Compliance with these regulations would ensure that any associated risk would be adequately reduced to less than significant.

Hazardous Building Materials

An Asbestos and Lead-Based Paint Survey Report, prepared by Clark Seif Clark, Inc. on April 20, 2015, was conducted on the project site. While asbestos containing materials (ACMs) were not found on the project site, lead-based paint (LBP) was detected in the existing structure.[64] As described previously, none of the sampled building components tested positive for asbestos and,

64 Clark Seif Clark, Inc., 2015. Asbestos and Lead-Based Paint Survey Report, 333 South La Cienega Los Angeles, California 90048. April 20, 2015.

therefore, no impacts related to ACMs would occur. LBP was detected in the existing structure onsite; however, none of the components tested have a lead concentration over the 0.7 mg/cm^2 regulatory action level. The State of California defines LBP as those materials that contain 5,000 ppm lead. The State of California also requires that if LBP with a lead concentration over 600 ppm is to be disturbed, then the individuals performing the work shall have the proper lead training and wear personal protective equipment. The lead concentration of the exterior of the existing building is over 1,000 ppm lead. Therefore, without proper abatement procedures, demolition/removal could expose workers and/or the environment to lead, a potentially significant impact. Implementation of Mitigation Measures HAZ-1 and HAZ-2 would ensure the proper handling and removal of LBP. Implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce the potential impacts of exposure to these hazardous building materials to a less-than-significant level.

Impacted Soils

A previous subsurface soil investigation at the project site indicated concentrations of total recoverable petroleum hydrocarbons (TRPH) up to 4,900 mg/kg were detected. In the absence of proper handling procedures, soil excavation at the project site could expose workers to elevated concentrations of hazardous materials during project construction. To ensure proper handling of contaminated soils, Mitigation Measure HAZ-3, which requires the preparation and implementation of a site-specific Health and Safety Plan in accordance with federal OSHA regulations, and Mitigation Measure HAZ-4, which requires the preparation and implementation of a Soil and Groundwater Management Plan, would be implemented prior to and during project construction. Implementation of these mitigation measures would ensure that potential impacts from the release of contaminated soils during project construction are reduced to a less-than–significant level.

Methane Zone

The project site has been identified by the Los Angeles Department of Building and Safety (LADBS) as being located in a Methane Zone, which is defined as a site that has been found to have the risk of methane intrusion emanating from onsite geologic formations. Methane is a potentially explosive hazard at elevated concentrations in enclosed spaces and would be an asphyxiant at sufficient concentrations. This designation is considered to be a business environment risk (BER) and potentially significant if building occupants are exposed to it at elevated concentrations. According to the Phase 1 Assessment, a methane gas survey was performed at the project site in 1990 by AeroVironment, Inc. Eighteen samples were collected at six-feet below ground surface and analyzed for methane. Methane was detected in 10 of the 18 samples from across the site ranging from one part per million by volume (ppmv) to more than 1,000 ppmv. The highest concentration of methane was detected in samples from the central and south central portions of the site. None of the detected concentrations were equal to or above one percent of volume (1%v). Thus, the concentrations of methane at the project site do not exceed the City's standards for additional remedial measures beyond the City Standard Mitigation for new development in a Methane Zone.

For new buildings constructed in either a Methane Zone or a Methane Buffer Zone, requirements are applied based on the LADBS, Site Design Level. Based on the findings of the methane gas

survey, the proposed project would be in Site Design Level 1 shown on Table 71 of LAMC Chapter IX, Article 1, Division 71. All new buildings and paved areas located in a Methane Zone would be required to comply with requirements set forth in the Los Angeles Building Code, Division 71, and the Methane Mitigation Standards established by the LADBS, including those listed below as Mitigation Measures HAZ-5 and HAZ-6. The Methane Mitigation Standards include installation procedures, design parameters, and test protocols for the methane gas mitigation system for all projects within a Methane Zone. Compliance with mitigation measures would reduce the risk from methane intrusion to residents and visitors. Therefore, the project would result in less-than-significant impacts associated with the potential for exposure to methane or explosive hazards and no additional mitigation measures would be required.

Based on the above conditions, the proposed project has potential for the accidental release of hazardous materials into the environment. However, with implementation of Mitigation Measures HAZ-1 through HAZ-6, impacts would be considered less than significant. This topic will not be evaluated further in the EIR.

Mitigation Measures:

The following mitigation measures shall be implemented to reduce potential impacts associated with removal of hazardous building materials and the accidental release of hazardous materials into the environment:

Mitigation Measure HAZ-1: Prior to building demolition, a Toxicity Characteristic Leaching Procedure analysis must be performed to determine the method of building material disposal.

Mitigation Measure HAZ-2: Demolition or renovation activities that may chip, grind, sand or any other mechanical method that would produce dust from LBP should be initially monitored for each activity to determine lead exposure to the construction workers. If monitoring indicates levels above 30 micrograms/m3 as the 8- hour time weighted average, the contractor performing the work shall implement engineering controls to reduce airborne lead levels. If airborne lead monitoring cannot be kept below 30 micrograms/m3, or it is anticipated that elevated levels may occur prior to demolition or renovation activities, the LBP should be removed by a LBP abatement contractor.

Mitigation Measure HAZ-3: Prior to the issuance of a grading permit, the construction contractor shall demonstrate that they have retained a qualified environmental professional to prepare and implement a site-specific Health and Safety Plan in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 CCR Title 8, Section 5192). The Health and Safety Plan shall be submitted to the City for review and approval. The Health and Safety Plan shall include all required measures to protect construction workers and the general public potentially exposed to hazardous materials by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction area and to reduce hazards outside of the construction area. If prescribed contaminant exposure levels are exceeded, personal protective equipment shall be required for workers in accordance with state and federal regulations. The plan shall include designated personnel responsible for implementation of the Health and Safety Plan. Submittal of the Health and Safety Plan to the City shall not be construed as approval of the

adequacy of the contractor's health and safety professional, the contractor's plan, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work.

Mitigation Measure HAZ-4: Prior to the issuance of a grading permit, the City shall require the construction contractor to prepare and implement a Soil and Groundwater Management Plan, subject to review by the City that specifies the method for handling and disposal of contaminated soil and groundwater prior to demolition, excavation, and construction activities. The plan shall include all necessary procedures to ensure that excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information.

- Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling.
- Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils.
- Detailed control measures for use and storage of hazardous materials to prevent the release of pollutants to the environment, and emergency procedures for the containment and cleanup of accidental releases of hazardous materials to minimize the impacts of any such release. These procedures shall also include reporting requirements in the event of a reportable spill or other emergency incident. At a minimum, the City or its contractor shall notify applicable agencies in accordance with guidance from the California Office of Emergency Services as well as the Los Angeles County Certified Unified Program Agency (CUPA) or County of Los Angeles Fire Department.
- Procedures for containment, handling and disposal of groundwater generated from construction dewatering, the method used to analyze groundwater for hazardous materials likely to be encountered at specific locations and the appropriate treatment and/or disposal methods.

An adverse environmental impact may result due to the project being located in an area of potential methane risk. However, the potential impact will be mitigated to a level of insignificance by the following measures:

Mitigation Measure HAZ-5: The Applicant shall comply with Administrative procedures of Ordinance No. 161,552 of the Los Angeles Municipal Code, establishing a High Potential Methane Zone in the Fairfax area of the City of Los Angeles.

Mitigation Measure HAZ-6: Environmental impacts may result from project implementation due to its location in an area of potential methane gas zone. However, this potential impact will be mitigated to a level of insignificance by the following measures:

- All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum

requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.

- All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.
- All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.

Significance: Less than significant with implementation of Mitigation Measures HAZ-1 through HAZ-6.

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

Less than Significant Impact. There are no existing or proposed schools located within one-quarter mile of the project site. The closest schools to the project site are the Maimondes Academy of West Hollywood located at 310 Huntley Drive, the Temple Emmanuel Academy Day School at 8844 Burton Way, Bar Ilan University at 8730 Wilshire Boulevard, and Horace Mann School at 8701 Charleville Boulevard located 0.33 mile northwest, 0.43 mile west, 0.48 mile southwest, and 0.60 mile southwest of the project site, respectively. As described above, during construction, the project would involve the temporary use of potentially hazardous materials; however, all such materials would be used and stored in accordance with all federal, state, and local standards and regulations for hazardous materials handling. During operation of the project, the types and amounts of hazardous materials that would be used in connection with the project would be typical of those used for retail, restaurant, and residential uses and would be used in limited quantities, and, thus, would not pose a risk to schools in the project vicinity. Therefore, impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

No Impact. As a part of the Phase 1 *Environmental Site Assessment*, an Environmental Data Resources (EDR) database search was conducted for the project site.[1] The database search included a review of databases and files from federal, state, and local environmental agencies to identify use, generation, storage, treatment, or disposal of hazardous materials and chemicals, or release incidents of such materials which may impact the project site. The Phase 1 *Environmental Site Assessment* found that the project site is not included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[65] Therefore, because the site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, there is no impact. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. The project site is located approximately 8.8 miles northeast of the closest public airport, Santa Monica Airport. The Los Angeles International Airport is located 14.1 miles southwest of the project site. The proposed project includes a mixed-use residential development and is not located within two miles of an existing public airport or public use airport, and is not located within an airport land use plan. Therefore, the proposed project would not pose a safety hazard for people working or residing in the project area from airport related hazards. There would be no impact and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. As discussed in Section 8.e, above, the project site is not located within the vicinity of a public airport or private airstrip. Given this location, the proposed project is not located within an airport land use plan. Therefore, the proposed project would not result in airport-related safety hazards for people working or residing in the area. There would be no impact and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

Less than Significant Impact. As noted in the Los Angeles General Plan Safety Element, the project site is located on La Cienega Boulevard, which is a City designated disaster route. Disaster routes function as primary thoroughfares for movement of emergency response traffic

65 Tetra Tech, 2015. Phase I Environmental Site Assessment 333 South La Cienega Boulevard. April 29, 2015.

and access to critical facilities. In addition, the Cedars-Sinai Medical Center is located on Beverly Boulevard, between San Vicente Boulevard and Robertson Boulevard. The Emergency Department at Cedars-Sinai Medical Center is located in the Harry and Ruth Roman Emergency Department, in the North Tower, and emergency vehicle access is provided along Gracie Allen Drive. As described further below in Section 16e., *Traffic and Circulation*, there would be temporary lane closures on San Vicente Boulevard and La Cienega Boulevard during construction. While it is unlikely, this could result in a potential impact to emergency access should a disaster happen during project construction.

As discussed in Section 16e., *Transportation and Circulation*, the proposed project would be implement PDF-3, which requires the preparation of a Construction Traffic Management Plan (CTMP). The CTMP would include traffic control measures that would be implemented during project construction, thereby reducing potential impacts associated with interruption of emergency access during construction. To ensure that emergency access is maintained throughout construction, the CTMP would include a disaster route detour plan. The detour plan would detail a route that would be taken in the case that a temporary lane closure is required during project construction. This detour route would ensure that the disaster route is maintained at all times during project construction. The CTMP would be reviewed and approved by the LADOT prior to being implemented. Therefore, compliance with the measures contained in the CTMP would ensure that impacts in regard to emergency access would remain less than significant.

Once constructed, the proposed project does not include any uses or design features that would result in interference with any adopted emergency response plan or emergency evacuation plan. The design of the proposed project would provide adequate emergency access consistent with City requirements, including the required number and design of access points and safety features. Therefore, the proposed project would not result in significant impacts to emergency access during construction and/or operation. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and, thus, this impact would be less than significant. Therefore, this topic will not be evaluated in the EIR.

Significance: Less than significant.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is located in an urbanized area and is currently developed with a three-story structure. The project site is not located within a City-designated Very High Fire Hazard Severity Zone and no wildlands are present in the surrounding area.[66] Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or

66 City of Los Angeles, 1996. Safety Element of the General Plan, Exhibit D Selected Wildfire Hazard Areas, Accessed at http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf on September 10, 2015.

death as a result of wildland fires. No impacts would occur and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Hazards and Hazardous Materials Impacts

The project area is located within an urban and built environment surrounded by commercial uses. Hazard related impacts typically occur in a local or site-specific context versus a cumulative context combined with other development projects; although it is possible for combined effects of hazards to occur by adjacent cumulative development that involves hazardous risks. Thus, the scope of analysis for cumulative impacts associated with accidental spills, releases, or explosions of hazardous materials encompasses the project vicinity. Several projects shown in Figure A-17 are in the vicinity of the project area; however, none are directly adjacent to the project site. As a result, there is limited potential that a hazardous event at the project site would result in cumulative impacts.

As discussed in Section 8b., above, accidental spills of small quantities of hazardous materials during construction (i.e., motor fuels, oils, solvents, lubricants) could expose the public or the environment to such substances. The project would be required to use and store hazardous materials in accordance with manufacturers' instruction and be handled in compliance with federal, state, and local regulations to prevent such a release and to promptly contain and clean up any spills. With compliance with existing federal, state and local laws and regulations the project's impact would be less than significant. Construction of cumulative projects in the project area vicinity could also involve the use of hazardous materials and could result in accidental releases of these materials. Although the potential exists for releases to occur in connection with the project and other cumulative projects, there is no way of predicting whether any such releases would occur. Further, the likelihood that more than one of the cumulative projects would have a substantial hazardous materials release that affects the same area within the same temporal period is low. Therefore, the effects of the proposed project in combination with those of other planned projects would not be cumulatively significant.

Cumulative impacts related to the presence of hazardous materials in the soil could occur if the proposed project and cumulative projects would be implemented in the same area at the same time. Of the projects listed in Table A-1, none are located immediately adjacent to the project site.

As discussed in Section 8b., above, hazardous materials could be present in project area soil and groundwater. Many of the potentially cumulative projects could also include excavation within areas near known or unknown hazardous materials sites. However, the locations of the cumulative sites are about one-quarter mile or further away. Consequently, the routes taken by hazardous soil export trucks from each of the cumulative sites are less likely to overlap. In addition, the construction activities associated with the cumulative projects would have to occur at the same time. While some of the cumulative projects might be under construction at the same time, it is unlikely that a sufficient number of the cumulative projects would occur at the same

time. Therefore, cumulative impacts related to the exposure of workers and the public to hazardous materials in soil during construction of the proposed project and other cumulative projects would not be considered cumulatively considerable.

During construction of the proposed project, if hazardous wastes are used or stored, the contractor for the project and the cumulative projects would be required to comply with the manufacturers' instruction for the use of the materials and be handled in compliance with federal, state, and local regulations. These instructions and regulations would specify appropriate methods for storing hazardous materials, preventing spills, inspecting for hazardous conditions, and reporting. Because the cumulative projects listed in Table A-1 would be subject to similar federal, state, and local requirements, they would also be required to implement the instructions and regulations to reduce the potential for leaks and spills of hazardous materials to runoff construction sites into the environment. Nonetheless, without mitigation, the proposed project's contribution to this impact could be cumulatively considerable. However, as required by Mitigation Measures HAZ-1 through Mitigation Measure HAZ-4, the project would include a site-specific Health and Safety Plan and a Soil and Groundwater Management Plan that specifies the appropriate procedures for managing soil during construction. Because these measures ensure worker safety provisions are implemented and that any contaminated soils are appropriately managed, the proposed project's contribution to cumulative impacts related to the exposure of workers and the public to hazardous materials in the soil would not be cumulatively significant.

As discussed in Section 8g., above, the construction activities of the project could interfere with emergency access routes. The project would be required by LADOT to implement a CTMP to ensure that disaster detour routes are established in the event that construction lane closures are necessary. This requirement would also apply to any cumulative project that includes lane closures that affect emergency access routes. Therefore, the cumulative effects of lane closures would not be significant. There are four related projects located along the disaster route on La Cienega Boulevard and San Vicente Boulevard. There is a potential that these projects could require lane closures during construction, including along La Cienega Boulevard, which would potentially disrupt emergency access along a City designated disaster route. If development of these projects occurs concurrent with the proposed project, then there could be a potential to result in a cumulative impact related to access to an emergency route. These related projects along the disaster route would be required to prepare a CTMP that would be reviewed and approved by LADOT. The CTMP would include measures to ensure that there is no combined conflict on the emergency route. Therefore, cumulative transportation and circulation impacts during construction, including potential impacts associated with lane closures, are concluded to be less than significant. Therefore, these topics will not be discussed in the EIR.

9. Hydrology and Water Quality

Would the project:

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

Less than Significant Impact. The entire project site is currently developed with impervious surfaces (with the exception of some minor planters and urban landscaping) and runoff from the site is typical of urban runoff. All onsite development would be demolished and the project site would be excavated to below ground surface levels. During project construction, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. Stormwater could also come into contact with pollutants onsite relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel. On-site watering activities to reduce airborne dust would result in dry-weather flows onsite, which could also come into contact with sediment and pollutants and contribute to pollutant loading in runoff. Thus, project-related construction activities could have the potential to result in adverse effects on water quality.

Construction

As project construction would disturb more than one acre of soil, the project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 99-08-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during project construction. The SWPPP would outline best management practices (BMPs) including erosion control, sediment control, good housekeeping, and waste management practices to minimize the discharge of pollutants in storm water runoff. Furthermore, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), including the preparation of an erosion control plan that would reduce the potential for sedimentation and erosion onsite to affect water quality. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. This topic will not be evaluated in the EIR.

Operation

During operation, and consistent with the existing uses onsite, the project would introduce sources of potential stormwater pollution that are typical of residential, retail, and restaurant uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with NPDES Municipal Permit requirements, the project would be required to implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements as established by the Los Angeles Regional Water Quality Control Board (LARWQCB) during the operational life of the project to reduce the

discharge of polluted runoff from the project site. The project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff onsite before discharging into the municipal storm drain system.

According to the project's geotechnical constraints review, the soil characteristics and geologic conditions of the project site render the use of infiltration system BMPs and stormwater capture and use BMPs technically infeasible onsite.[67] Therefore, the project would implement high efficiency biofiltration/bioretention systems for the site, which can include bioretention planters with underdrains, cartridge media filters, vegetated swales, and/or catch basin inserts to both treat and control stormwater runoff prior to discharging offsite. In addition, the project would control pollutants, pollutant loads, and runoff volume emanating from the project site by minimizing the amount of impervious surface area on the project site and including approximately 8,609 sf of garden space located on the ground floor. The proposed project would not increase the effective impervious area or decrease the infiltration capacity of permeable areas compared to the pre-project conditions. With infiltration onsite infeasible, biofiltration/bioretention BMPs shall be sized to capture and treat 150 percent of the design capture volume (or the expected runoff produced from a 0.75-inch storm event). The project's BMPs would also ensure compliance with the City's LID requirements. The final selection of BMPs would be completed through coordination with the City of Los Angeles as part of the site plan review and permitting process. The SUSMP would be subject to review and approval by the City for compliance with the City of Los Angeles' Development Best Management Practices Handbook, Part B, Planning Activities. With compliance with these existing regulatory requirements, impacts to water quality during operation would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact with Mitigation Incorporated. The project site is underlain by the Hollywood Subbasin of the Coastal Plain of Los Angeles Groundwater Basin.[68] Based on review of local groundwater records and past geotechnical investigations, groundwater in the near-site vicinity has been encountered at depths ranging from approximately 10 to 15 feet below ground surface (bgs); the historic high groundwater level for the site, as of 1998, was less than 10

67 Stantec Consulting Services Inc. 2015. Preliminary Drainage & LID Report for 333 La Cienega Boulevard Project. Los Angeles, California. October 9, 2015 (See Appendix F).

68 Department of Water Resources (DWR). 2004. California's Groundwater Bulletin 118. Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin. Last updated February 27, 2004. Available at: http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/4-11.02.pdf; accessed October 13, 2015.

feet below bgs.[69] The local shallow groundwater is not presently used as a water supply source; however, the City of Beverly Hills, which is located 0.38 mile west of the project site, has retained its rights to extract groundwater from the Hollywood Subbasin for future use.[70]

As stated previously, the proposed site conditions during operation of the project would not increase the effective impervious area or decrease the infiltration capacity of permeable areas compared to the pre-project conditions. To ensure the groundwater table height is not raised any further, because of the high groundwater table under the site, infiltration BMPs, storm water capture, and use BMPs would not be implemented onsite to avoid consequential site instability. Therefore, the amount of groundwater recharge would not be substantially altered as a result of the proposed project.

Groundwater levels are estimated to be between 10 and 15 feet bgs at the project site, and the proposed project building would include two subterranean parking levels that would extend at least 19 feet bgs. As such, contact with the groundwater table would likely occur during construction and dewatering would likely be required. The extent to which it is required would be based on the groundwater conditions at the time of construction and the proposed depth of the below-grade excavation. Impacts to the groundwater table may result from implementation of the proposed project through direct withdrawals per dewatering, or through interception of an aquifer by cuts or excavations. Additionally, the groundwater table could be determined to be sufficiently high at consistent rates so as to require a permanent dewatering system throughout the project's operation in order to avoid consequential soil stability issues. Any dewatering must be controlled to avoid inducing settlement or other impacts to adjacent structures and facilities. Temporary and long-term dewatering that may be required could result in potentially significant impacts to the quantity of groundwater present in the local groundwater basin. In order to reduce any potential impacts related to groundwater supplies, Mitigation Measure HYD-2 would require a Groundwater Impact Analysis Report be prepared to assess to what extent temporary dewatering is necessary during construction and whether a permanent dewatering system is required for project operation. The report would also determine how the proposed dewatering would affect the height of the local groundwater table and the extent of the impact of groundwater drawdown. In addition, Mitigation Measure HYD-3 would require the Applicant to prepare a Report of Waste Discharge for dewatering activities in order to determine what permit is required to cover those activities and ensure protection of water quality. Mitigation Measure HYD-1 would be required in the case that a permanent dewatering system is necessary as determined by Mitigation Measure HYD-2. Mitigation Measure HYD-1 would require the water obtained from the permanent dewatering system to serve a beneficial use onsite such as irrigation or be returned to the groundwater basin by an injection well.

69 Stantec Consulting Services Inc. 2015. Preliminary Drainage & LID Report for 333 La Cienega Boulevard Project. Los Angeles, California. October 9, 2015.

70 SA Associates. 2011. City of Beverly Hills Urban Water Management Plan. August 2011. Available at: https://www.beverlyhills.org/cbhfiles/storage/files/filebank/9152--Urban%20Water%20Management%20Plan%202010_8-30-11.pdf accessed October 13, 2015.

Mitigation Measures:

Mitigation Measure HYD-1: The Department of Building and Safety requires, when feasible, that applicants modify the structural design of a building so as not to need a permanent dewatering system. When a permanent dewatering system is necessary, the Department of Building and Safety require the following measures to mitigate the impacts to a level of insignificance:

- Pumping water to a beneficial use on site such as landscape irrigation or decorative fountains or lakes; or
- Return water to the groundwater basin by an injection well.

Mitigation Measure HYD-2: In the event that temporary and/or permanent groundwater dewatering activities or interceptions to aquifers are required for project construction, a groundwater hydrology report shall be required to assess and approximate the drawdown amount in the groundwater table that such dewatering will cause and to disclose the spatial limits of dewatering and aquifer interception impacts.

Mitigation Measure HYD-3: In the event that temporary and/or permanent groundwater dewatering activities are required, the project Applicant shall file a Report of Waste Discharge with the Los Angeles Regional Water Quality Control Board, which is used to start the application process for all discharge requirements and will determine what permit the project will require to cover its dewatering discharges (either to surface water or groundwater). Coverage under the permit specified in the Regional Water Quality Board's response to the Report of Waste Discharge shall be obtained prior to Project construction, and the Applicant shall adhere to all requirements of the approved permit to ensure either surface water quality, groundwater quality or both are not impacted by dewatering activities.

Therefore, in the event dewatering activities are required during construction or operation, implementation of Mitigation Measures HYD-1 through HYD-3 would be implemented to reduce impacts the groundwater table to less than significant. This topic will not be evaluated in the EIR.

Significance: Less than significant with implementation of Mitigation Measures HYD-1 through HYD-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, in a manner which would result in substantial erosion or siltation on- or off- site?

Less than Significant Impact. The project site is currently developed with a vacant single-tenant discount department store on the ground level and an operational parking garage occupying the three levels (two levels and the roof) above. There is minimal landscaping on the project site, and

it is surrounded by developed areas with intermittent landscaping. The project site is not crossed by any water courses or rivers. The project site slopes in a northerly to southerly direction and runoff on the project site currently sheet flows (moves in a thin continuous, film over the ground surface) onto the adjacent streets and into the City's storm drain system.[71]

With implementation of the project, drainage from the project site would continue to sheet flow from north to south, similar to existing conditions. The proposed project was assigned a conservative 95 percent impervious value for hydrology calculations for the site; it would actually be approximately 88 percent impervious (therefore, less runoff than assumed in the calculations). The proposed project is a redevelopment of a developed area and would not substantially increase the effective impervious area or decrease the infiltration capacity of permeable areas compared to what currently exists. As discussed in Section 9a., biofiltration/bioretention BMPs would capture and treat up to 150 percent of the design capture volume and in doing so would slow down runoff and allow some of the water to evaporate or be absorbed into the soil prior to discharge offsite. Therefore, runoff is not expected to increase in quantity leaving the site. Runoff would be conveyed through the onsite storm drain system sized to convey the 50-year storm event. Site grading would provide overland escape in the event the storm drain system fails. The proposed project would connect to the existing storm drain inlets provided in La Cienega Boulevard.

Should runoff reach sufficient velocity and come into contact with unpaved areas onsite during construction or operation, erosion could result. As discussed above, during project construction, a SWPPP would be developed and implemented. The SWPPP would outline erosion control and sedimentation control measures to minimize the discharge of sediment in storm water runoff during construction. Additionally, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the Los Angeles Municipal Code), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. As part of the City's standard building permitting and review process, the project would also be required to prepare and submit a detailed final Drainage Plan prepared in accordance with County of Los Angeles methodology to further ensure that project flows leaving the site would not exceed the baseline condition. In addition, as stated previously in Section 9a., above, biofiltration/bioretention BMPs incorporated into project design as part of SUSMP and LID requirements would slow the velocity of runoff during project operation, thereby decreasing its erosive power and treating it prior to it flowing offsite. Thus, the project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or offsite flooding would occur. Impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase

[71] Stantec Consulting Services Inc. 2015. Preliminary Drainage & LID Report for 333 La Cienega Boulevard Project. Los Angeles, California. October 9, 2015.

the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. There are no existing waterways or drainages on the project site, and the proposed project would not substantially increase the effective impervious area or decrease the infiltration capacity of permeable areas compared to what currently exists. In addition, the project site is not currently susceptible to flooding issues, and the proposed project would be designed to include biofiltration/bioretention BMPs which would further reduce the potential for onsite flooding. Therefore, there would be a less than significant impact and this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The proposed project is a redevelopment of a developed area and would not substantially increase the effective impervious area or decrease the infiltration capacity of permeable areas compared to what currently exists. Thus, the amount of stormwater runoff would not increase above what currently exists. In addition, as discussed in Section 9a. and 9c., above, biofiltration/bioretention BMPs would capture and treat up to 150 percent of the design capture volume and in doing so would slow down runoff and allow some of the water to evaporate or be absorbed into the soil prior to discharge offsite. Therefore, runoff is not expected to increase in quantity leaving the site. Runoff would be conveyed through the onsite storm drain system sized to convey the 50-year storm event. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Furthermore, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), including the preparation of an erosion control plan that would reduce the potential for sedimentation and erosion onsite to affect water quality and would comply with the Construction General Permit. Thus, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. Therefore, potential impacts to surface water quality would be less than significant and no mitigation measures are required. This impact will not be evaluated further in the EIR.

Significance: Less than significant.

f. Otherwise substantially degrade water quality?

Less than Significant Impact with Mitigation Incorporated. As discussed above in Question 9.a, 9.b, and 9.c above, with implementation of regulatory requirements and Mitigation Measures HYD-1 through HYD-3, water quality impacts associated with construction and operation of the

proposed project would be considered less than significant. This topic will not be evaluated in the EIR.

Mitigation Measure: See Mitigation Measures HYD-1 through HYD-3.

Significance: Less than significant with implementation of Mitigation Measures HYD-1through HYD-3.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Less than Significant Impact. A significant impact to floodplain or floodplain management would occur if a project caused significant encroachment within a base floodplain, as defined by U.S. Department of Transportation Order 5650.2. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA), the project site is located in Zone X, which are areas of 0.2 percent chance of flooding,[72] or a 500-year floodplain. Therefore, the project would not place housing or other structures in a 100 year floodplain and no significant impacts would occur and there is a less-than-significant impact. This topic will not be evaluated in the EIR.

Significance: Less than significant.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

Less than Significant Impact. As discussed in Question 9g, above, the project site is not located within a 100-year floodplain as mapped by FEMA. According to FEMA, the project site is located within Zone X, which is an area of a 0.2 percent chance flood, or a 500-year floodplain. Therefore, the project would not place housing within a 100-year floodplain that would impede or redirect flood flows. This impact is considered less than significant and this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project site is listed as being within the inundation hazards zones for the Lower Franklin and Greystone Reservoirs by the County and City of Los Angeles; the dams are located approximately 3 miles and 2 miles northwest of the project site, respectively.[73] This identifies the site as being within an area susceptible to flooding should a dam breach occur at either of these reservoirs. The lower Franklin Canyon Dam is managed by

[72] Stantec Consulting Services Inc. 2015. Preliminary Drainage & LID Report for 333 La Cienega Boulevard Project. Los Angeles, California. October 9, 2015.

[73] Stantec Consulting Services Inc. 2015. Preliminary Drainage & LID Report for 333 La Cienega Boulevard Project. Los Angeles, California. October 9, 2015.

the Los Angeles Department of Water and Power (LADWP) and is overseen by the California Department of Water Resources, Division of Safety of Dams (DSOD). The DSOD supervises dam maintenance and inspections. Dams are required to adhere to rigorous DSOD standards; which include conservation seismic analysis of existing dams to assure their integrity and conducting regular inspections. The Greystone Reservoir is owned by the City of Beverly Hills and receives regular inspections.[74] Given the maintenance and inspection procedures in place at the dams and the distance of the dams to the project site, the potential for impacts on the Project site from dam failure is considered low and speculative. Therefore, this is a less than significant impact and this topic will not be evaluated in the EIR.

Significance: Less than significant.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows are a form of landslides resulting from the downslope movement of soil and/or rock under the influence of gravity.

The Project site is approximately nine miles east of the Pacific Ocean. The project site is not located within Tsunami Inundation Hazard Areas on State, County or City hazard maps. Because the site is located in a relatively flat area, landslides or other forms of natural slope instability are not considered as representing a significant hazard to the project.[75] The project site is not located near any large body of water that could generate a seiche. Therefore, no tsunami, mudflow, or seiche events are expected to impact the project site. No impacts would occur and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Hydrology and Water Quality Impacts

The cumulative projects (related projects listed on Table A-1 and shown on Figure A-17) involve development of 53 commercial, retail, and housing structures. As shown in Figure A-17, these 53 related projects are located in the City of Los Angeles, the City of Beverly Hills, and West Hollywood in a highly urbanized and developed area. Sediment or other pollutants exposed on these project sites during their construction or operation could result in runoff that could violate water quality standards or waste discharge requirements. However, the related projects are located in a highly developed area, which is mainly impervious, and, thus, would not likely contribute to a substantial increase in runoff compared to existing conditions. The cumulative

74 Ostashay & Associates (Ostashay). 2012. Memorandum to William Crouch, City of Beverly Hills: "Landmark Assessment Confirmation Review: Doheny Estate/Greystone Mansion, 905 Loma Vista Drive, Beverly Hills, CA." Dated October 3, 2012. Accessed at https://www.beverlyhills.org/cbhfiles/storage/files/18317362627441245 64/GreystoneMansion.pdf on October 15, 2015.

75 Ibid.

projects are located in a generally flat portion of the Los Angeles Basin, not near any bodies of water that could expose people or structures to hazards from inundation of a seiche, tsunami, or mudflow. In addition, the related projects would each be subject to existing regulations (including implementation of a SWPPP per Construction General Permit requirements as well as SUSMP and LID requirements) and undergo separate CEQA review to assure that any impacts are appropriately evaluated and, if necessary, mitigated. As described above, the proposed project would consist of the redevelopment of a developed area and would not substantially increase the effective impervious area or decrease the infiltration capacity of permeable areas and, thus, would not alter the existing drainage pattern of the project site or interfere with groundwater recharge. The proposed project would not degrade water quality or result in an increase of stormwater runoff which could degrade water quality. Similar to the related projects, the proposed project is located in a highly developed and is not located within a flood hazard zone and, thus, would not expose people or structures to hazards from flooding, inundation of a seiche, tsunami, or mudflow. Therefore, the project's contribution to cumulative impacts on hydrology and water quality would be less than significant.

10. Land Use and Planning

Would the project:

a. Physically divide an established community?

No Impact. The proposed project would develop a 20-story mixed-use building with 145 residential units and approximately 30,276 sf of commercial retail space, comprised of 26,906 sf of commercial retail uses and 3,370 sf of commercial restaurant uses. The project site is located in a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, institutional, and residential uses. The project site is located in an active area that serves as a regional commercial center for the Wilshire Community Plan area and the greater Los Angeles area.[76]

The proposed project would be an infill use in keeping with the mixed-use, commercial, and retail character of the surrounding area. The proposed 20-level structure would be in scale with developments in the surrounding area, such as the Cedars-Sinai Medical Center, and, thus, would not create an obstruction that could physically divide a community. Furthermore, the proposed project would include significant streetscape and walkability improvements, such as landscaped street level elements including street trees, shrubs and garden surrounding the central water feature at the main entrance of the project site, that would make it easier and safer for the community to access the project site and adjacent locations and for project residents to access other parts of the community. Thus, given the existing mix of uses in the vicinity and the infill character of the proposed project, it is not anticipated that the proposed project would physically

76 City of Los Angeles, 2001. Wilshire Community Plan. Accessed at http://planning.lacity.org/complan/pdf/wilcptxt.pdf on August 31, 2015.

divide, disrupt, or isolate an established community. Therefore, there would be no impact from the proposed project and this topic will not be evaluated in the EIR.

Significance: No impact.

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

Less than Significant Impact. As described above in Section 10.a, the project site is located within the Wilshire Community Plan Area and adjacent to the Beverly Center-Cedars Sinai Regional Commercial Center. The project site has a land use designation of Neighborhood Office Commercial per the Wilshire Community Plan and a zoning designation of C2-1VL-O (Commercial, Height District 1VL) per the City Zoning Code. The project proposes to change the existing zoning from C2-1VL-O to C2-2-O, which would remove the limit on building heights and allow for the proposed floor area of six times the buildable area of the lot. In addition, the proposed project would require a General Plan Amendment (GPA) that would change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. Since the project involves several discretionary approvals, there could be a potentially significant impact due to conflicts with land use plans or policies. Therefore, this topic will be analyzed further in the EIR. The proposed project would be consistent with the local plans and applicable policies contained in the City of Los Angeles General Plan Framework Element, Wilshire Community Plan, and the Los Angeles Municipal Code, and regional land use plans including the Southern California Association of Governments (SCAG) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy and the SCAQMD AQMP, which emphasize mixed-use development and transit-oriented development. Therefore this impact would be considered less than significant. Nevertheless, given these proposed land use changes, the project's consistency with the General Plan, associated land use plans, and the proposed zoning will be evaluated further in the EIR.

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

No Impact. As discussed above in Section 4, *Biological Resources*, the project site is located within an urbanized area and is currently developed with a three story structure. The project site contains a small amount of landscaping; however, it does not support any habitat or natural community nor is it located within a habitat conservation plan or natural community conservation plan. Accordingly, the project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Land Use Impacts

As shown in Table A-1 and Figure A-17, there are 53 related projects in the vicinity of the project site, which generally consist of infill development and redevelopment of existing uses, including mixed use, office, residential, etc. The project site is located in a highly urbanized area that includes a mixture of low-, mid-, and high-rise buildings containing a variety of uses including commercial, retail, institutional, and residential. The proposed project would be an infill use in keeping with the mixed-use, commercial, and retail character of the surrounding area. Thus, given the existing mix of uses in the vicinity and the infill character of the proposed project, it is not anticipated that the proposed project would physically divide, disrupt, or isolate an established community and, thus, would not contribute to any cumulative impacts to the area. The project site contains a small amount of landscaping; however, it does not support any habitat or natural community nor is it located within a habitat conservation plan or natural community conservation plan. Accordingly, the project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan and no impacts would occur as a result. As with the proposed project, the related projects would undergo separate CEQA review to assure that any impacts due to the physical division, disruption, or isolation of an established community or conflicts with an adopted habitat conservation plan or natural community conservation plan are appropriately evaluated and, if necessary, mitigated. Therefore, the proposed project's and related project's cumulative impacts with regard to the physical division, disruption, or isolation of an established community or conflicts with an adopted habitat conservation plan or natural community conservation plan would not be cumulatively considerable and cumulative impacts would be less than significant. Therefore, these topics will not be evaluated in the EIR.

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11. Mineral Resources

Would the project:

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

No Impact. The project site is located in the City of Los Angeles in an urbanized area, on a developed parcel with surrounding retail, residential, institutional, and commercial uses. According to the County of Los Angeles General Plan, Special Management Areas map, (which maps resources throughout the County, including the City of Los Angeles), the project site is not located in a Mineral Resource Zone.[77] In addition, according to the California Division of Oil, Gas and Geothermal Resources (CADOGGR) information, a small area of the southwestern portion of the project site is located within the San Vicente Oil Field and the remainder of the project site is located within the Salt Lake Oil Field. CADOGGR maps and geographical

[77] County of Los Angeles, 1980. Department of Regional Planning, General Plan Maps. Special Management Areas. Accessed http://planning.lacounty.gov/assets/upl/project/gp_web80-special-management-areas-map-4.pdf March 31, 2015.

information system depicted two oil wells located on adjacent properties east and north of the site, respectively.[78] A 1991 survey performed by CRM as part of oil well abandonment activities showed Arctrus 137 to be located on the southern portion of the project site. Both wells were abandoned in 1913 to CADOGGER regulations at the time. However, the Phase I Environmental Site Assessment has found both wells were not abandoned to current 2015 CADOGGR standards. Nonetheless, as both oil wells have been abandoned and have not been in use for a long period of time, there would be no loss of availability to a known mineral resource. Thus, implementation of the project would not result in the loss of availability of known mineral resources that would be of value to the region and the residents of the state, nor would it result in the loss of availability of a locally-important mineral resource recovery site. Therefore, there would be no impact to mineral resources and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

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. Refer to Response 11a., above. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Mineral Resources Impacts

The project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area,[79] an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[80] Therefore, no impact associated with the loss of availability of a known mineral resource would occur. Additionally, the project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. Thus, no impact associated with the loss of availability of a known mineral resource would occur. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative impacts.

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78 Tetra Tech, *Final Phase I Environmental Assessment Report for 333 La Cienega Boulevard*, 2015.

79 California Department of Conservation (CDC), *Generalized Mineral Land Classification Map of Los Angeles County – South Half*, ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf, 1994, accessed December 15, 2015.

80 City of Los Angeles, *General Plan Safety Element Exhibit E*, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, 1994, accessed December 15, 2015.

12. Noise

Would the project result in:

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

Potentially Significant Impact. The project site is located in the City of Los Angeles within a highly urbanized area that contains a variety of noise sources. Existing land uses located within the project vicinity include the he Westbury Terrace condominium tower and Our Lady of Mount Lebanon-St. Peter Cathedral to the west directly across San Vicente Boulevard. Immediately north, within the same block, is a single-story strip mall commercial center containing restaurant and retail uses. The Beverly Center and Cedars-Sinai Medical Center are located across 3rd Street to the north and northwest, respectively. Across La Cienega Boulevard to the east are one and two-story commercial-retail centers, with residential uses east of the commercial/retail centers. A mixed-use residential/retail building lies directly to the south across Burton Way, with residential uses south of Burton Way and west of Le Doux Road. The most predominate source of noise in the project area is associated with traffic from roadways. Construction of the proposed project would require the use of heavy equipment during the demolition, grading, and excavation activities, installation of new utilities, paving, and building fabrication for the proposed structure. These construction activities would generate noise on a temporary basis. During operation of the project, noise levels generated at the project site would mainly occur from new mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units, the loading dock serving the new commercial uses, parking facilities, traffic related to the new uses, and activity at outdoor gathering areas. Given the potential for the increase in uses, this topic will be evaluated in the EIR.

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

Potentially Significant Impact. Construction activities at the project site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment (i.e., tractors, loaders, excavators, backhoes, haul trucks, etc.) generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. No high-impact activities, such as pile driving or blasting, would be used during project construction. The nearest offsite receptors, both sensitive and non-sensitive uses, to the project site include the mixed-use residential/retail building located to the south, across San Vicente Boulevard and Burton Way; the multi-family residential building located to the southwest, across San Vicente Boulevard and Burton Way; the Our Lady of Mount Lebanon-St. Peter Cathedral and Westbury Terrace condominium tower located to the west, across San Vicente Boulevard the retail uses located directly to the north; and the commercial retail uses to the east, across La Cienega Boulevard. Therefore, the project would have the potential to generate and expose people to excessive

groundborne vibration and noise levels during short-term construction activities. Given this potential, this topic will be evaluated in the EIR.

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

Less than Significant Impact. As described above in Section 12.a, operation of the project could increase existing noise levels as a result of HVAC units, the loading dock serving the new commercial uses, parking facilities, traffic related to the new uses, and activity at outdoor gathering areas.

Traffic Noise

With respect to offsite vehicle traffic, the proposed project is estimated to generate a total net increase of 1,947 daily trips to and from the project site.[81] The increase in traffic resulting from implementation of the project would increase the ambient noise levels at land uses fronting the roadways located in proximity to the project area. Generally, in order for traffic noise to be audible, there would need to be a 3 dBA CNEL or greater noise increase. In turn, a 3 dBA CNEL increase in ambient noise from traffic is typically achieved when the volume on any given roadway is doubled, assuming that the speed and fleet mix remains constant.[82] In comparing the existing daily traffic volumes in the project site vicinity against the traffic volume that would be introduced by the project, it was determined that the project would not cause a doubling of traffic volumes on any existing roadways within the project study area. Nonetheless, roadway noise levels were forecasted to further demonstrate that the project's vehicular traffic would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The FHWA-RD-77-108 model was used to demonstrate that the increase in traffic activity associated with the project would not result in a significant increase in traffic-related noise at various roadway segments in the project vicinity. The changes in traffic noise levels associated with implementation of the project are identified in **Table 5**.

81 The Mobility Group, 2015. Traffic Review – Revised 333 La Cienega Boulevard Project Memorandum. October 13.

82 City of Los Angeles, 2006. L.A. CEQA Thresholds Guide.

TABLE 5
ROADWAY NOISE LEVELS WITH PROJECT

		Noise Levels in dBA CNEL[a]				
Roadway Segment	**Existing Land Uses Located Along Roadway Segment**	**Existing Traffic Volumes**	**Existing + Project Traffic Volumes**	**Increase**	**Significance Threshold[b]**	**Significant?**
Robertson Boulevard, north of Beverly Boulevard	Commercial	67.3	67.3	0.0	5.0	No
Robertson Boulevard, south of Beverly Boulevard	Commercial/Office	67.3	67.3	0.0	5.0	No
Robertson Boulevard, north of 3rd Street	Commercial	67.2	67.2	0.0	5.0	No
Robertson Boulevard, south of 3rd Street	Commercial	67.7	67.8	0.1	5.0	No
Robertson Boulevard, north of Burton Way	Commercial	67.8	67.8	0.0	5.0	No
Robertson Boulevard, south of Burton Way	Residential/ Commercial	67.4	67.4	0.0	5.0	No
Robertson Boulevard, north of Clifton Way	Commercial	67.7	67.7	0.0	5.0	No
Robertson Boulevard, south of Clifton Way	Commercial/Office	68.3	68.3	0.0	5.0	No
San Vicente Boulevard, north of Beverly Boulevard	Commercial/Hospital/ Residential	67.2	67.3	0.1	5.0	No
San Vicente Boulevard, south of Beverly Boulevard	Commercial/Hospital	66.8	66.9	0.1	5.0	No
San Vicente Boulevard, north of 3rd Street	Commercial/Hospital	67.3	67.3	0.0	5.0	No
San Vicente Boulevard, south of 3rd Street	Church/Residential/ Commercial	66.4	66.7	0.3	5.0	No
San Vicente Boulevard,, north of Burton Way	Church/Residential/ Commercial	66.8	66.8	0.0	5.0	No
San Vicente Boulevard, west of La Cienega Boulevard	Residential	68.5	68.6	0.1	5.0	No
San Vicente Boulevard, east of La Cienega Boulevard	Commercial/Office/ Light Industrial	70.5	70.5	0.0	5.0	No
San Vicente Boulevard, north of Wilshire Boulevard	Commercial/Office	67.1	67.2	0.1	5.0	No
San Vicente Boulevard, south of Wilshire Boulevard	Residential/Office	67.7	67.7	0.0	5.0	No
La Cienega Boulevard, north of Oakwood Avenue	Residential/ Commercial	69.4	69.4	0.0	5.0	No
La Cienega Boulevard, south of Oakwood Avenue	Commercial	68.9	68.9	0.0	5.0	No
La Cienega Boulevard, north of Beverly Boulevard	Hotel/Commercial	68.7	68.7	0.0	5.0	No
La Cienega Boulevard, south of Beverly Boulevard	Commercial	69.6	69.6	0.0	5.0	No
La Cienega Boulevard, north of 3rd Street	Commercial	70.2	70.2	0.0	5.0	No
La Cienega Boulevard, south of 3rd Street	Commercial	70.3	70.4	0.1	5.0	No

TABLE 5
ROADWAY NOISE LEVELS WITH PROJECT

		Noise Levels in dBA CNEL[a]				
Roadway Segment	**Existing Land Uses Located Along Roadway Segment**	**Existing Traffic Volumes**	**Existing + Project Traffic Volumes**	**Increase**	**Significance Threshold[b]**	**Significant?**
La Cienega Boulevard, north of Blackburn Avenue	Commercial	70.4	70.5	0.1	5.0	No
La Cienega Boulevard, south of Blackburn Avenue	Commercial	70.3	70.4	0.1	5.0	No
La Cienega Boulevard, north of San Vicente Boulevard	Commercial	70.3	70.3	0.0	5.0	No
La Cienega Boulevard, south of San Vicente Boulevard	Commercial/Light Industrial	71.7	71.7	0.0	5.0	No
La Cienega Boulevard, north of Clifton Way	Commercial/Light Industrial	70.6	70.7	0.1	5.0	No
La Cienega Boulevard, south of Clifton Way	Commercial/Office	70.5	70.5	0.0	5.0	No
La Cienega Boulevard, north of Wilshire Boulevard	Commercial/Office	70.6	70.7	0.1	5.0	No
La Cienega Boulevard, south of Wilshire Boulevard	Commercial/Office	70.9	70.9	0.0	5.0	No
Oakwood Avenue, east of La Cienega Boulevard	Residential/ Commercial	59.3	59.3	0.0	5.0	No
Beverly Boulevard, west of Roberson Boulevard	Commercial	68.7	68.7	0.0	5.0	No
Beverly Boulevard, east of Robertson Boulevard	Commercial	68.4	68.4	0.0	5.0	No
Beverly Boulevard, west of San Vicente Boulevard	Commercial/Hospital	69.2	69.2	0.0	5.0	No
Beverly Boulevard, east of San Vicente Boulevard	Commercial	68.7	68.7	0.0	5.0	No
Beverly Boulevard, west of La Cienega Boulevard	Commercial/Hotel	68.9	68.9	0.0	5.0	No
Beverly Boulevard, east of La Cienega Boulevard	Commercial	69.5	69.5	0.0	5.0	No
3rd Street, west of Robertson Boulevard	Commercial	66.1	66.2	0.1	5.0	No
3rd Street, east of Robertson Boulevard	Commercial	66.7	66.7	0.0	5.0	No
3rd Street, west of San Vicente Boulevard	Commercial	67.8	67.8	0.0	5.0	No
3rd Street, east of San Vicente Boulevard	Commercial	67.1	67.2	0.1	5.0	No
3rd Street, west of La Cienega Boulevard	Commercial	67.2	67.3	0.1	5.0	No
3rd Street, east of La Cienega Boulevard	Commercial	68.4	68.4	0.0	5.0	No
Blackburn Avenue, east of La Cienega Boulevard	Residential/ Commercial	56.0	56.0	0.0	5.0	No
Burton Way, west of Robertson Boulevard	Residential/ Commercial	67.2	67.2	0.0	5.0	No

TABLE 5
ROADWAY NOISE LEVELS WITH PROJECT

		Noise Levels in dBA CNEL[a]				
Roadway Segment	**Existing Land Uses Located Along Roadway Segment**	**Existing Traffic Volumes**	**Existing + Project Traffic Volumes**	**Increase**	**Significance Threshold[b]**	**Significant?**
Burton Way, east of Robertson Boulevard	Residential	66.6	66.7	0.1	5.0	No
Burton Way, west of San Vicente Boulevard	Residential/ Commercial	66.1	66.1	0.0	5.0	No
Clifton Way, west of Robertson Boulevard	Residential/ Commercial	59.4	59.4	0.0	5.0	No
Clifton Way, east of Robertson Boulevard	Residential/ Commercial	59.7	59.7	0.0	5.0	No
Clifton Way, west of La Cienega Boulevard	Residential/ Commercial	60.8	60.8	0.0	5.0	No
Clifton Way, east of La Cienega Boulevard	Commercial/Light Industrial	57.3	57.6	0.3	5.0	No
Wilshire Boulevard, west of Robertson Boulevard	Commercial	71.7	71.7	0.0	5.0	No
Wilshire Boulevard, east of Robertson Boulevard	Commercial/Office	71.5	71.5	0.0	5.0	No
Wilshire Boulevard, west of La Cienega Boulevard	Commercial/Office	71.1	71.2	0.1	5.0	No
Wilshire Boulevard, east of La Cienega Boulevard	Commercial/Office	71.0	71.0	0.0	5.0	No
Wilshire Boulevard, west of San Vicente Boulevard	Commercial/Office	70.8	70.8	0.0	5.0	No
Wilshire Boulevard, east of San Vicente Boulevard	Commercial/Office/ School	69.0	69.0	0.0	5.0	No

a Values represent noise levels at the approximate property line of the nearest receptors.

b According to the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase (see Table 3.8-8). For instance, the significance threshold is 3 dBA if the increased noise resulting from the project would meet or exceed the City's 70 dBA CNEL noise level standard at residential, hotel, church, and hospital uses, and 75 dBA CNEL noise level standard at commercial uses, which are still within the "conditionally acceptable" noise category for the land uses. Under conditions where the increased noise levels resulting from the project would not exceed the aforementioned levels, then the significant threshold would be 5 dBA. Along roadway segments that have multiple land uses, the noise level standard for the land use that requires the lowest noise levels was used, which would allow for a conservative analysis.

Source: ESA, 2015. 333 La Cienega Boulevard Project Noise Technical Report. October.

As shown in Table 5, the proposed project would increase local noise levels by a maximum of 0.3 dBA CNEL at the roadway segments of San Vicente, south of 3rd Street, and Clifton Way, east of La Cienega Boulevard. As this noise increase would not exceed the City's allowable noise increment, this impact would be less than significant. In addition, as the other roadway segments that are located even farther away from the project site would experience less traffic increases due to the project, the increase in local noise levels at these roadway segments would also not exceed the City's allowable noise increase criteria, and impacts would be less than significant.

Onsite Stationary Noise Sources

Aside from traffic noise, the project would generate noise levels from the operation of onsite noise sources. Noise levels generated at the project site would occur from new mechanical equipment, the loading dock serving the new commercial uses, parking facilities, and activity at outdoor gathering areas. In summary, it was determined that none of these onsite noise sources would result in an increase in the ambient noise levels at nearby offsite sensitive uses above 5 dBA.

With respect to onsite mechanical equipment, a majority of this equipment would be located in enclosed rooms within levels of the mixed-use building, and all new mechanical equipment and HVAC units and exhaust fans installed outside of the proposed mixed-use building would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dBA. Given compliance with Section 112.02 of the LAMC and the height of the proposed mixed-use building, noise levels generated from HVAC or other related equipment are not anticipated to be perceptible at the nearby offsite sensitive uses.

Additionally, because the project's loading dock serving the proposed retail and restaurant uses would be located within an enclosed area of the mixed-use building at the ground level, the nearby offsite sensitive uses would be adequately shielded from this noise source and would not be exposed to an increase in ambient noise levels. Although the project would have three levels of above-ground parking on Levels 2 through 4 of the new building, parking-related noise levels would not result in increased ambient noise levels at the nearby off-site sensitive receptors as two of these parking levels would be enclosed on all sides and the third parking level would be partially enclosed on all sides in a manner similar to the existing parking garage at the project site. As discussed previously, the project's highest peak hour vehicle trips, which would be 183 trips during the PM peak hour, would only generate noise levels of approximately 49 dBA L_{eq} at 50 feet from the project's parking facility. As all of the nearest offsite sensitive land uses to the project site are all located beyond 50 feet from the project site boundary and currently have ambient noise levels that are much greater than 49 dBA L_{eq}, the noise levels experienced by these offsite sensitive land uses from vehicles using the project's parking facility during the PM peak hour would not be perceptible. Taking into consideration that a three-story parking garage currently operates at the project site that is only partially enclosed on all three levels, the project's parking facilities would not introduce a new noise source that would result in increased ambient noise levels at nearby offsite uses above existing conditions.

Finally, with respect to noise levels generated from the project's outdoor gathering areas, it was determined that the two nearest offsite sensitive receptors that would be affected by these noise sources (i.e., mixed-use residential/retail building and the Our Lady of Mount Lebanon-St. Peter Cathedral located to the south and west of the project site, respectively) would not be exposed to increases in their existing ambient noise levels exceeding 5 dBA.

Overall, noise impacts associated with the project's onsite noise sources would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing

without the project. Therefore, the proposed project would result in a less than significant noise impact related to a permanent increase in ambient noise levels. No mitigation measures are required and this topic will not be discussed further in the EIR.

Significance: Less than significant.

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

Potentially Significant Impact. Due to the proximity of the existing offsite sensitive uses to the project site, the project's construction activities would expose these sensitive receptors to increased exterior noise levels. These potentially significant short-term noise impacts from construction would have the potentially to temporarily or periodically increase the ambient noise levels above existing levels. Therefore, this topic will be evaluated in the EIR.

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

No Impact. The project site is not located within two miles of an airport or within an area subject to an airport land use plan. The closest airport to the project site is the Santa Monica Airport, in Santa Monica, approximately 8.8 miles southwest of the project site. No impacts would occur and no mitigation measures are required. No further evaluation of this topic is required.

Significance: No impact.

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

No Impact. The project site is not located within the vicinity of a private airstrip. No impacts would occur and no mitigation measures are required. Therefore, this topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Noise Impacts

The development of the proposed project in combination with ambient growth and other development projects in the vicinity of the project site could potentially result in cumulative noise and vibration impacts at nearby sensitive land uses. Under conditions where the project's construction activities would occur concurrently with other related projects located nearby the project site, cumulative noise and vibration impacts on sensitive land uses in the project area could occur. Additionally, the long-term operation of the proposed project and other nearby related projects would also generate noise levels associated with both stationary and mobile sources. The operational noise levels generated by the project's onsite stationary sources

specifically include new mechanical equipment such as heating, ventilation, and air conditioning (HVAC) units, the loading dock serving the new commercial uses, parking facilities, and activity at outdoor gathering areas. These onsite stationary noise sources of the project, when combined with those from other related projects in the project area, could potentially result in cumulative noise impacts related to an increase in the ambient noise levels at nearby sensitive land uses. Furthermore, the project and related projects in the area would produce traffic volumes (offsite mobile sources) that would generate roadway noise. As such, future cumulative traffic conditions from future ambient growth, related projects, and the proposed project could result in substantial noise increases above existing ambient conditions at noise-sensitive land uses. Therefore, these potential cumulative impacts in the project area related to construction and operational noise levels will be analyzed in the EIR.

13. Population and Housing

Would the project:

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

Less than Significant Impact. The Applicant proposes the construction of a mixed-use retail and residential development, consisting of 145 residential units and 31,055 sf of commercial uses, including 27,685 sf for commercial retail and 3,370 sf for commercial restaurant uses in the Wilshire Community Plan area of the City of Los Angeles. This section discusses direct and indirect population and housing growth impacts from the proposed project.

A significant impact may occur if the proposed project would create new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Whether the added development would directly induce substantial population or housing growth is evaluated on a case-by-case basis according to the City's *L.A. CEQA Thresholds Guide* by determining: (1) the degree to which the proposed project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build-out, and that would result in an adverse physical change in the environment; (2) whether the proposed project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (3) the extent to which growth would occur without implementation of the proposed project. As shown in the analysis that follows, direct and indirect population and housing growth from the proposed project's residential and commercial components fall within City projections for the Wilshire Community Plan area and would not exceed projected or planned levels for the year of project occupancy/build-out, nor result in an adverse physical change in the environment.

Construction

Construction workers would be required during the limited construction period (two years) of the proposed project. Construction jobs are anticipated to be filled by residents in the local area, or by commuters within the larger Los Angeles Metropolitan Area.[83] However, construction workers typically remain on site only for the timeframe in which their specific skills are necessary to complete a particular phase of the construction process. As such, construction workers are not anticipated to relocate to the project area for a temporary construction assignment. Therefore, impacts related to a substantial population increase during construction would be less than significant.

Operation

Employment opportunities during operation of the proposed project would be mainly retail and restaurant oriented uses, and are not anticipated to directly increase the population or housing in the area, as positions are anticipated to be filled by local residents or regional commuters. Indirect impacts to population and housing may occur when the operation of a commercial use generates new jobs that in turn induce development of housing units to accommodate the new workers. The commercial component of the proposed project is small (31,055 sf), and would therefore not accommodate a large number of employees. The estimated number of employees that would be generated by the commercial component of the proposed project would be approximately 84 employees.[84] In addition, the residential component of the proposed project is expected to generate a small number of employees who would work in valet, security, and building maintenance positions, that could also be filled by local residents or regional commuters.

Potential employees are not anticipated to relocate for the types of employment opportunities offered by the proposed project. Typically, employees are less likely to relocate for jobs in the retail or restaurant industry since there tends to be a higher turnover in these jobs and less long-term stability. Currently, the 2015 unemployment rate in the Los Angeles Metropolitan Area is approximately seven percent.[85] Thus, it is assumed that many of the employment positions would be filled by the currently unemployed population who live within the surrounding area. Given this assumption, operation of the proposed project is not anticipated to substantially increase the population in the area.

Indirect growth from extension of roads and infrastructure would not be anticipated, as the proposed project would not add any new roadways and would be served by existing infrastructure with minor proposed upgrades and connections to accommodate the proposed project. The proposed project would therefore not introduce unplanned infrastructure that was not previously evaluated in the adopted Wilshire Community Plan or the General Plan.

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83 Bureau of Labor Statistics, 2015. Unemployment Rates for Metropolitan Areas. February 2015. Accessed at http://www.bls.gov/web/metro/laummtrk.htm on April 13, 2015

84 Los Angeles Unified School District, 2012. 2012 Developer Fee Justification Study. February 9, 2012, Table 11. Based on the employee generation rate for "Neighborhood Shopping Center" land uses, which is 0.00271 employees per average square foot.

85 Bureau of Labor Statistics, 2015. Unemployment Rates for Metropolitan Areas. February 2015. Accessed at http://www.bls.gov/web/metro/laummtrk.htm on April 13, 2015.

The analysis below therefore focuses on direct population and housing impacts due to the residential component (145 dwelling units) of the proposed project.

Regional Population and Housing Trends (Southern California Association of Governments (SCAG) Region and the City of Los Angeles)

Los Angeles is the second largest city in the nation and the most populous in the state. In 2010, the SCAG region had a population of approximately 18,051,534.[86] The population of the SCAG region grew 9.3 percent between 2000 and 2010. SCAG forecasts that the population for its six-county region will increase by 4.2 million between 2008 and 2035 (SCAG, 2012).[87]

The housing inventory on the SCAG regional level increased between 2000 and 2010. During this timeframe approximately 85,208 units were added, bringing the regional housing stock to approximately 5.9 million dwelling units.[88] According to SCAG, the region's population density decreased from 3.07 average persons per dwelling unit in 2000 to 3.0 in 2010. **Table 6** provides population and housing counts and projections for the City of Los Angeles as reported by SCAG, the California Department of Finance (CDOF), and the City of Los Angeles.

TABLE 6
POPULATION AND HOUSING TRENDS FOR THE CITY OF LOS ANGELES

	2000 Census	2010 Census	2014 (est.)	2020 (est.)	Increase (2010-2020)	Percent Growth (2010-2020)
Population						
SCAG	3,694,742	3,792,621	3,904,657	3,991,700	199,079	5.25
CDOF	3,694,742	3,792,621	3,914,359			
City of LA	3,694,820	3,792,621	3,926,390	3,965,433	172,812	4.56
Housing (dwelling units)						
City of LA	1,337,706	1,413,995	1,429,813	1,473,292	53,666	3.78

Source: SCAG,[89] CDOF,[90] City of Los Angeles[91]

Data from the SCAG, the CDOF, and the Los Angeles General Plan Housing Element 2013-2021 demonstrate that the City of Los Angeles population was over 3.7 million in 2010. The City

86 SCAG, Profile of the City of Los Angeles, https://scag.ca.gov/Documents/LosAngeles.pdf, May 2015, accessed November 11, 2015.
87 Ibid.
88 Ibid
89 SCAG, Regional Transportation Plan 2012-2035, Growth Forecast Appendix, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, 2012.
90 California Department of Finance (CDOF). *E-1 Cities, Counties and the State Population Estimates with Annual Percent Change, January 1, 2014 and 2015*, http://www.dof.ca.gov/research/demographic/reports/estimates/e-1/view.php, 2015, accessed November 11, 2015.
91 City of Los Angeles, 2014. Growth and Infrastructure Report 2014, Accessed at: http://planning.lacity.org/PolicyInitiatives/GrowthandInfrastructure/GIReport_2014.pdf on November 11, 2015.

population was estimated to be approximately 3.9 million in 2014 and is expected to increase to approximately 3.9 million by 2020.[92]

The City of Los Angeles data also indicate a projected housing growth increase of 53,666 units (or 3.78 percent) from 2010 to 2020 within the City. This increase results in approximately 6,000 housing units on average annually.

Local Population and Housing Trends (Wilshire Community Plan Area)

For the purposes of developing, maintaining and implementing the land use portion of the General Plan, the City of Los Angeles has been divided into 35 community planning areas. Plans for these 35 communities collectively comprise the Land Use Element of the General Plan. Population forecasts are provided within each of the community plans. The project site falls within the City's Wilshire Community Plan area, an approximate 14-square mile portion of the City. In the Wilshire Community Plan area, single-family units comprise approximately 42 percent of the residential land and approximately 86 percent of the total residential units are comprised of multi-family units. In 2000, the average population density in the Wilshire Community Plan area was 32.6 persons per gross acre, which was the second highest for community plan areas in the City.[93]

As shown in **Table 7**, while the population increased by approximately 2.5 percent within the Wilshire Community Plan area between 1990 and 2000, it subsequently decreased between 2000 and 2014 by approximately 0.6 percent. Table 6 also demonstrates that the housing ratio within the Wilshire Community Plan has decreased from 2.43 persons per dwelling unit (292,059 residents/120,113 dwelling units) in 2000 to an estimated 2.28 persons per dwelling unit (290,3383 residents/127,540 dwelling units) in 2014. The current population density of 2.28 residents per dwelling unit within the Wilshire Community Plan area has been used to estimate the increase in population as a result of the proposed project.

TABLE 7
POPULATION AND HOUSING TRENDS FOR THE WILSHIRE COMMUNITY PLAN AREA

	1990	2000	2010 (est.)	2014	Wilshire CPA Projections through 2010	Change from 2000-2014	Percent Change
Population							
Wilshire Community Plan	271,732	292,059	283,044	290,383	377,144	(-1,676)	(-0.6)
Housing							
Wilshire Community Plan	114,121	120,113	121,399	127,540	138,330	7,423	6.2

Source: SCAG,[94] CDOF,[95] City of Los Angeles[96, 97]

92 SCAG, Profile of the City of Los Angeles, https://scag.ca.gov/Documents/LosAngeles.pdf, 2012, accessed April 13, 2015.

93 City of Los Angeles, Wilshire Community Plan, http://planning.lacity.org/complan/pdf/wilcptxt.pdf, 2001, accessed March 31, 2015.

94 SCAG, Regional Transportation Plan 2012-2035, Growth Forecast Appendix, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, 2012.

Population and Housing in the Wilshire Community Plan Area

As stated above, the 2000 U.S. Census recorded that the Wilshire Community Plan area had a population of approximately 292,059 persons.[98] In 2014, the City of Los Angeles recorded that the Wilshire Community Plan area had a population of approximately 290,383 persons.[99,100] Thus, there was a population decrease of 1,676 persons or 0.6 percent over a 14-year period.

Based on the average 2014 population density of 2.28 people per dwelling unit within the Wilshire Community Plan area, the proposed project would generate approximately 331 residents (145 dwelling units x 2.28 persons per household in the Wilshire Community Plan Area = 330.6).[101] The Wilshire Community Plan only includes population projections until the year 2010; however, the 2014 population in the plan area, as identified by the City of Los Angeles, was below the 2010 projection. As the Wilshire Community Plan and the General Plan do not provide population estimates beyond 2010, and the 2014 population was below the 2010 projection, this impact analysis therefore assumes that the population and housing projections would not change for the 2018 build-out year. As indicated in Table 7, population within the Wilshire Community Plan area was approximately 290,383 persons in 2014 and an anticipated buildout population of approximately 377,144 persons in 2010. Thus, the current population of the Wilshire Community Plan is 86,761 persons below the population anticipated at full buildout. The proposed project's population increase of 331 residents represents less than one percent of the remaining capacity in the Wilshire Community Plan area.[102] Given this incremental amount, the project is within the growth projections contained in the Wilshire Community Plan.

An evaluation of the proposed project's impact on the larger citywide scale shows, as expected, an even smaller impact. **Table 8** displays the 2010 Census population and housing figures, as well as City projections. The City population is expected to climb to approximately 3,991,700 by 2020. As stated in Table 6, the 2014 estimate of the City of Los Angeles population is 3,926,390 persons.[103] Thus, the projected increase in population between 2014 and 2020 is 65,310 people. The proposed project's population increase represents 331 residents/65,310 new City residents, or approximately less than one percent of the City's anticipated population increase.

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95 California Department of Finance (CDOF). Estimates, official website, Accessed at http://www.dof.ca.gov/research/demographic/reports/view.php#objCollapsiblePanelEstimatesAnchor on April 13, 2015.

96 City of Los Angeles, 2001. Wilshire Community Plan, Accessed at http://planning.lacity.org/complan/pdf/wilcptxt.pdf, on March 31, 2015.

97 City of Los Angeles, 2014. Growth and Infrastructure Report 2014, Accessed at: http://planning.lacity.org/PolicyInitiatives/GrowthandInfrastructure/GIReport_2014.pdf on November 11, 2015.

98 City of Los Angeles, 2000. Census 2000 Statistical Profile. Los Angeles Citywide. Accessed at http://planning.lacity.org/DRU/C2K/C2KPfl.cfm?geo=Cw&loc=LA_&yrx=Y09 on April 13, 2015.

99 U.S. Census Bureau, 2012. American Factfinder. Accessed at http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml on April 13, 2015.

100 City of Los Angeles, 2014. Growth and Infrastructure Report 2014, Accessed at: http://planning.lacity.org/PolicyInitiatives/GrowthandInfrastructure/GIReport_2014.pdf on November 11, 2015.

101 145 dwelling units x 2.28 persons per household in the Wilshire Community Plan Area = 330.6

102 528 residents / 90,066 remaining capacity = 0.58 percent

103 City of Los Angeles, 2014. Growth and Infrastructure Report 2014, Accessed at: http://planning.lacity.org/PolicyInitiatives/GrowthandInfrastructure/GIReport_2014.pdf on November 11, 2015.

TABLE 8
LOS ANGELES CITY – PLANNED GROWTH BASED ON ADOPTED 2020 POPULATION AND HOUSING PROJECTIONS

	2010	2020 Projection	Increase from 2010 – 2020	Percent Growth
Population	3,792,621	3,991,700	199,079	5.25
Housing	1,413,995	1,455,700	41,705	2.95

Source: SCAG,[104] U.S. Census Bureau, 2010.[105]

The housing projections shown on Table 6 indicate that at full build-out, 138,330 dwelling units are projected within the Wilshire Community Plan and, that in 2014, 127,540 dwelling units existed within the Wilshire Community Plan. As a result, the Wilshire Community Plan anticipates than an estimated 10,790 dwelling units could be added to reach full build-out of the Plan area. The proposed project's housing unit increase represents 145 units/10,790 new Wilshire Community Plan dwelling units, or approximately 1.3 percent of the anticipated 10,790 new dwelling units expected to be added to the plan area at full build-out. Therefore, the proposed project would generate a negligible percentage of new dwelling units to the total anticipated new dwelling units expected at full build-out.

As expected, on the citywide scale the impact is even smaller. The housing statistics for the City of Los Angeles shown on Table 8 above indicate that 1,413,995 dwelling units were anticipated to exist in 2010. The proposed project's housing unit increase represents 145 dwelling units/41,705 new citywide dwelling units, or approximately 0.35 percent of the Los Angeles City housing unit growth anticipated between 2010 and 2020.

The proposed project's current General Plan land use designation permits residential uses onsite and the proposed residential use would be consistent with these designations. The proposed project's residential uses would not cause the Wilshire Community Plan's growth projections to be exceeded, nor would it cause any of the citywide projections to be exceeded.

Therefore, the projected population and housing growth associated with the proposed project would fall within the Wilshire Community Plan area projections, as well as the City of Los Angeles citywide projections. The proposed project would not induce substantial population growth in an area, either directly or indirectly. Impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

[104] SCAG, Regional Transportation Plan 2012-2035, Growth Forecast Appendix, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, 2012.
[105] U.S. Census Bureau, 2012. American Factfinder. Accessed at http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml on April 13, 2015.

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

No Impact. The project is a mixed-use residential and commercial development, which would provide 145 residential units in the Wilshire Community Plan area. The project site is currently developed with commercial uses and, thus, no residential units would be removed in order to construct the proposed project. Therefore, the project would not displace any existing housing units or people, nor necessitate the construction of replacement housing elsewhere. There would be no impact and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: No impact.

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

No Impact. Refer to Impact 13b., above. This topic will not be evaluated in the EIR.

Significance: No impact.

Cumulative Population and Housing Impacts

The 53 related projects listed in Table A-1 and shown on Figure A-17 would introduce additional residential, hotel, commercial, retail, restaurant, office, etc. uses to the City of Los Angeles. Of these 53 related projects, 41 are residential related projects (including the proposed project) and would result in a direct population increase of in the City of Los Angeles, while other types of related projects could result in indirect population growth. Using the 2.28 per dwelling unit generation rate from the Wilshire Community Plan,[106] the residential projects would cumulatively contribute approximately 1,270 new residential dwelling units, generating approximately 2,896 new residents to the area.

As discussed above in Impact 13a., the proposed project would not exceed SCAG's RCP subregion growth projections of 65,310 people between 2014 and 2020. The cumulative population increase would represent approximately 4.4 percent of the City's anticipated population increase (2,896 new residents/65,310 projected residents). Thus, growth anticipated from the proposed project and related projects would be within the growth projects of the Wilshire Community Plan.

Furthermore, the proposed project is the type of project encouraged by SCAG and City policies to accommodate growth in urban centers that are close to existing employment centers and mass transit. Because the project would not displace any residents, and the population growth associated with the project has already been anticipated and planned for within the Wilshire Community Plan area, the proposed project population growth would not be cumulatively considerable. Therefore, the project's cumulative impacts to population and housing would be less than significant.

[106] City of Los Angeles, 2001. Wilshire Community Plan. Accessed at http://planning.lacity.org/complan/pdf/wilcptxt.pdf. Accessed on March 31, 2015.

14. Public Services

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

a. Fire protection?

Less than Significant Impact. Fire prevention, fire protection and emergency medical services (EMS) for the City of Los Angeles are provided by the Los Angeles Fire Department (LAFD), which currently has a staff of 3,246 uniformed fire personnel, 353 non-sworn professional support personnel, and a total of 1,018 uniformed firefighters (including 270 serving as Firefighter/Paramedics) are always on duty at fire department facilities throughout the 106 neighborhood fire stations located in the Department's 471 mile jurisdiction.[107]

Construction

Removal of existing onsite building and construction of the proposed project could increase the potential for onsite fires from such sources as the operation of mechanical equipment or the use of flammable construction materials, and the careless disposal of cigarettes, but the implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize fire hazards associated with the construction of the proposed project. Such measures would be in effect during construction of the proposed project.

Construction activities could also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements, utility installations, and construction staging. However these impacts would be less than significant because the proposed project would implement a Traffic Control Management Plan. Implementation of a Traffic Control Management Plan would minimize the effects of construction on vehicular traffic, including emergency vehicles, and assist in the orderly flow of vehicular circulation in the area of the project.

In summary, project construction would be temporary in nature and, thus, would not require additional fire protection and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts to fire protection services would be less than significant.

[107] City of Los Angeles Fire Department (LAFD), 2015. Accessed at http://www.lafd.org on March 31, 2015.

Operation

According to the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station of the expansion, consolidation or relocation of an existing facility to maintain service. The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Section 57.09.07 of the Los Angeles Fire Code (Fire Code) states the maximum responses distance for an engine company for a region with land uses commercial, industrial/commercial is 1 mile, and for a truck company, 1.50 miles. For neighborhood land uses, the maximum response distance for both an engine and a truck company is 1.50 miles. If these distances are exceeded, all new structures outside of the maximum response distance would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code (e.g., fire signaling systems, fire extinguishers, smoker removal systems, etc.). With such systems installed, fire protection would be considered adequate even if the project is located beyond the maximum response distance. In addition, automatic fire sprinkler systems are also required for all high-rise structures within the City of Los Angeles that exceed 75 feet in height.

The proposed project would include 31,055 sf of commercial retail uses and 145 residential units in a 240-foot mixed-use high rise building. The proposed project would be served by Fire Station No. 61, located at 5821 West 3rd Street.[108] The station has a current response time of approximately five minutes, and is located approximately 1.7 miles west of the project site.[109, 110] This distance is outside of the 1.5 mile maximum response distance from Station No. 61. Given this distance and the building's height which exceeds the 75 foot threshold, automatic fire suppression sprinklers would be required by the Fire Code. In accordance with this regulation, the proposed project would include the installation of automatic fire suppression sprinklers. Therefore, the project would be in compliance with the Fire Code. In addition, as required by the California Health and Safety Code and LAFD requirements, the proposed project would be required to comply with all requirements pertaining to fire protection systems, such as the adequate provisions of smoke alarms, fire extinguishers, building access, emergency response notification systems, and fire flows.

The required fire flow necessary for fire protection varies based on the type of development, life hazard, occupancy, and the degree of fire hazard. According to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing. A proposed project would necessitate the addition of new hydrants if any part of the ground floor of the development would be located more than 300 feet from the nearest fire hydrant servicing the site. Given that there are five fire hydrants within the immediate vicinity of the project site, including two on the western sidewalk of La Cienega

[108] LAFD, 2015. Accessed at http://www.lafd.org/ on March 31, 2015.
[109] LAFD, Personal Communication with Captain Craig Nielson, at LAFD Station No. 61. October 22, 2015.
[110] City of Los Angeles, *L.A. CEQA Thresholds Guide*, 2006

Boulevard within 300 feet from ground floor of the proposed project, no additional fire hydrants would be necessary. To determine the overall fire flow requirement for the proposed project, the Applicant submitted a Fire Service Pressure Flow Report, which indicates residential flow/pressure table for water system street main at the proposed project location, to the LADWP to ascertain whether further water system or site-specific improvements are necessary. The Fire Service Pressure Flow Report was approved by LADWP on November 18, 2015 for two water mains, a 6-inch main in La Cienega Boulevard and an 8-inch main in San Vicente Boulevard, for the proposed project.[111] In addition, the Los Angeles Fire Department has confirmed there would be no need to require the expansion of Fire Station No. 61, nor would it require the acquisition of new equipment, facilities or staff to serve the new employees and residents generated by the proposed project.[112]

With adherence to California Health and Safety Code, LAFD standards and regulations, and the submittal of a Fire Service Pressure Flow Report, the proposed project would install adequate fire protection systems and, thus, would not result in the need for new or physically altered governmental facilities, the construction of which could cause a significant environmental impact, as described above. Therefore, impacts to fire protection services would be less than significant and no mitigation measures would be required.

Access to the project site for the purposes of fire suppression and EMS vehicles is currently provided via public roadways located directly adjacent to the project site, including La Cienega Boulevard and San Vicente Boulevard. As described in Section 16e., *Transportation and Circulation*, these roads would continue to provide emergency access upon operation of the proposed project. Furthermore, as the project site is located in a highly urbanized area, there would be no brush fire potential at or near the project site. Therefore, the proposed project would not inhibit emergency vehicle access and impacts to emergency access would be less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

b. Police protection?

Less than Significant Impact. Primary police and law enforcement services are provided by the City of Los Angeles Police Department (LAPD); supplemental services are provided by the Los Angeles County Sheriff, the California Highway Patrol, the Federal Bureau of Investigation, and the Drug Enforcement Administration. The LAPD operates 21 stations within four bureaus. Currently, the LAPD has a total of over 10,354 sworn officers and 3,640 civilian employees, with an overall officer to population ratio of 1:433.[113]

[111] Los Angeles Department of Water and Power, *Fire Services Pressure Flow Report*, November 18, 2015.
[112] LAFD, personal communication with Craig Neilson, Captain of LAFD Station No. 61 on October 22, 2015.
[113] LAPD, official website, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed October 19, 2015.

Construction

Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. Therefore, when not properly secured, construction sites can create a greater need for local law enforcement. As described further below, the Applicant has prepared a Security Plan to ensure adequate preparedness with fast and appropriate response to emergency and security situations. This Security Plan details security measures that would be in effect during project construction, including erecting temporary fencing around the construction site to discourage trespassers and deploying security guards to monitor the construction site and deter any potential criminal activity. These features would minimize the need for police services during construction of the proposed project and, thus, impacts on police protection services during project construction would be considered less than significant.

As described in Section 16e., *Transportation and Circulation*, the proposed project may also require temporary lane closures on streets adjacent to the project site during project construction. Such closures may be necessary for utility relocations, for delivery of materials for certain construction procedures, and/or for construction staging purposes. These temporary lane closures could have the potential to temporarily disrupt police services during construction. However, a Traffic Control Management Plan would be required that includes traffic control measures designed to ensure that potential temporary and short-term traffic impacts of any necessary lane and/or sidewalk closures during the construction period remain less than significant. Implementation of the Traffic Control Management Plan would minimize the effects of construction on vehicular traffic and assist in the orderly flow of vehicular circulation in the area of the project. Therefore, emergency site access and access to nearby roadways would be maintained and construction-related traffic impacts would be less than significant and no mitigation measures are required.

In summary, with implementation of the Security Plan and the Traffic Control Management Plan, construction of the proposed project would not result in an additional demand in police protection services, impact police service ratios, or require the construction of new police facilities. Therefore, impacts would be less than significant.

Operation

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

LAPD assigns its protection services based on population of an area, the number of calls received by a general area, geographic setting, as well as various other community characteristics. Police

protection services would be provided to the site by the Wilshire Community Police Station, located at 4861 West Venice, in the City of Los Angeles. This station is located 2.65 miles southeast of the project site, and would be the primary responder to the site.

Based on the Wilshire Community Plan, the population associated with the project would be approximately 331 new residents (2.28 residents per residential dwelling unit). LAPD assumes a generation rate three persons per residential unit, however, and a generation rate of three persons per 1,000 sf for retail with regard to demand for police protection services. Therefore, according to LAPD's generation rates, the proposed project would increase the number of people in the area potentially requiring police protection services by approximately 528 persons.[114]

According to the Wilshire Community Plan, the population in the plan area was projected to grow to approximately 377,144 persons by 2010.[115] These population estimates do not include the daytime population in the Wilshire Community Plan area, which would likely be even greater as a result of daytime employees and visitors. According to the LAPD, within the Wilshire Community Police area, "throughout the day, the business and residential population swells to approximately 500,000 people due to those who pursue knowledge and skills training at educational and professional institutes, and those who work or visit Wilshire's business and residential neighborhoods."[116] In 2014, the population of the Wilshire Community Plan area was approximately 290,383 people.[117] Although the Wilshire Community Plan area population was estimated to reach 377,144 persons in 2010, the population of the area has not reached this number. Thus, the area has capacity for an additional 86,761 persons in the area. Using LAPD's population generation rate, the population growth associated with the proposed project would represent less than one percent of the remaining capacity in the Wilshire Community Plan area.[118] In addition, the proposed project's contribution to population would be negligible compared to the Wilshire Community Plan's daytime population of approximately 500,000 people. Therefore, the population increase resulting from the proposed project, based on net increase of residential units or square footage of non-residential floor area would be a very small portion of the already expected increase in population in the Wilshire Community Plan area, and an even smaller portion of the total existing population in the Wilshire Community Plan area. The LAPD has stated that the impact of the proposed project on its servicing capacity would most likely be less than significant, considering the already dense population of the surrounding area.[119] The LAPD performs an annual review of its distribution throughout all Los Angeles stations, and would make the appropriate changes as necessary to accommodate the small potential increase in demand that may be anticipated as a result of the proposed project.

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114 Project Residents: 3 persons per household x 145 (residential units) = 435 residents; Project Employees: 3persons per household x 31 (approximately 31,055 sf of commercial retail) = 93 employees; 435 residents + 93 employees = 528 persons total.

115 SCAG, Regional Transportation Plan 2012-2035, Growth Forecast Appendix, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, 2012.

116 LAPD, 2015. Accessed at http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, on March 31, 2015.

117 U.S. Census Bureau, 2012. American FactFinder, Accessed at http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml on April 7, 2015.

118 528 residents / 90,066 remaining capacity = 0.58 percent

119 City of Los Angeles Police Department (LAPD), Personal communication with Police Officer John Anthony, Wilshire Patrol Division, October 19, 2015.

The proposed project is situated with LAPD's Beverly Center Area (Basic Car 7A1). According to the COMPSTAT Wilshire Area Profile (2/22/15 to 3/21/15), for year-to-date crimes in the Wilshire Community area, total violent crime is down by 6.3 percent from January 2015 to February 2015, and by 27.9 percent when compared to 2013.[51] In addition, the Applicant has prepared a Security Plan to ensure adequate preparedness with fast and appropriate response to emergency and security situations. The design of the proposed project would incorporate principles set out in the Los Angeles *Design Out Crime* initiative which implements the techniques of Crime Prevention Through Environmental Design (CPTED). The Security Plan provides a description of all security operations, emergency response procedures, and staffing requirements for operation of the proposed project. CPTED measures include, but are not limited to, providing: a clear border definition of controlled space; clearly marked transitional zones that indicate movement from public to semiprivate to private space; the location of gathering areas to locations that provide natural surveillance and access control, as opposed to locations away from the view of would-be offenders; and activities in locations where the natural surveillance of activities would increase the perception of safety for legitimate users and risk for offenders. Security design features would also include, but are not limited to, a Proximity Access Control (PAC) system requiring residents to present (but not swipe) an access control card to be admitted to non-public areas, including elevators and the subterranean garage; a door entry phone system for visitors, all under the natural surveillance of a manned security/concierge desk; lobby attendant 24/7 with fully equipped surveillance monitors at desk; surveillance cameras in parking levels, all entries and public areas; proper lighting in all common areas; well lighted hallways; and all walkways designed to have clear line of sight with no obstructions from potted plants, landscaping, trees or permanent fixtures.

In summary, while construction and operation of the proposed project would increase the need for police protection services, this increase could be accommodated by the LAPD. Furthermore, the proposed project would implement a security plan which would secure the project site and would reduce the need for police protections services. Thus, the proposed project would not result in an increase in the need for police protection services, such that the construction of new or physically altered police facilities would be needed. Therefore, impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

c. Schools?

Less than Significant Impact. The project site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD) including the following: Rosewood Elementary School, which has a capacity for 624 students and a 2012-2013 enrollment of 305 students, located at 503 Croft Avenue; Burroughs Middle School which has a capacity for 2,400 students and a 2012-2013 enrollment of 1,947 students, located at 600 South McCadden Place and Fairfax High School, which has the capacity for 3,238 students and a 2012-2013 enrollment of 2,333 students, located at 7850 Melrose Avenue (LAUSD, 2015). As demonstrated by the 2012 to 2013

enrollment figures, all of the schools serving the project have enrollments substantially below capacity.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors: the population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area; the demand for school services anticipated at the time of the project buildout compared to the expected level of service available, considering as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand; whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students and classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and whether the project includes features that would reduce the demand for school services (e.g., onsite school facilities or direct support to LAUSD).

The proposed project would replace an existing commercial development (vacant discount department store and three levels of parking) with mixed-use retail and residential uses. As shown on **Table 9**, the proposed project's residential uses would generate a total of approximately 32 students (16 elementary school students, 7 middle school students, 9 high school students).

Each of the schools that would serve the proposed project would have sufficient capacity to accommodate the potential increase in students as a result of the proposed project. Therefore, the students generated by the proposed project would not be expected to require the construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the schools. In addition, the 84 employment opportunities created by the commercial/retail portion of the proposed project would not result in substantial population growth (and potential subsequent students), as prospective employees are expected to commute from the local area and are not anticipated to relocate for the types of temporary employment opportunities offered by construction of the proposed project.

TABLE 9
LAUSD STUDENT GENERATION RATES FOR THE PROPOSED PROJECT

Number of type of unit	Number of units	Elementary school	Middle School	High School
Multiple (Rented) 1 bedroom	84	0	0	0
Multiple (Rented) 2 bedroom	61	16	7	9
Subtotal	145	16	7	9
Total Project Estimated Students				**32**

Notes:
Elementary School generation rates: .0 for 1 bd, 0.25 for 2 bd.
Middle school generation rates: .0 for 1 bd, 0.1 for 2 bd.
High school generation rates: .0 for 1 bd, 0.14 for 2 bd
Source: LA CEQA Thresholds, Exhibit K.3-9, LAUSD Student Generation Factors for "Multiple (Rented) (Units that permit children)".

Further, State Bill 50 (SB 50), or the Leroy F. Green School Facilities Act (Act), provides for funding for higher education facilities, K-12 facilities, modernization of older schools, additional funding for districts in hardship situations, and funding for class size reduction. This Act provides that no land use proposal can be denied due to insufficient school capacity. It also provides for a mandated CEQA mitigation fee for schools. SB 50 consists of an impact fee levied on square footage basis for residential and commercial development. The payment of development fees to LAUSD would be used to offset the cost of providing additional educational facilities for the projected students.

As described above, the project would not result in a substantial population increase that could in turn increase the number of students in the LAUSD. Therefore, the current schools are sufficient to accommodate the proposed project and the proposed project would not result in the need for additional school facilities. Further, pursuant to SB 50 discussed above, payment of school fees to the Los Angeles Unified School District would offset and reduce the potential impact of additional student enrollment at schools serving the project area; therefore, impacts would be considered less than significant. This topic will not be evaluated in the EIR.

Significance: Less than significant.

d. Parks?

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

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and

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

The City of Los Angeles has more than 15,600 acres of parkland that, in addition to parks, includes recreation centers, golf courses, swimming pools, tennis courts, child care centers, youth camps, sports programs, and programs for senior citizens. The Wilshire Community Plan has designated approximately 191 acres of parkland, including approximately 100 acres of private golf course (Wilshire Country Club). There are ten neighborhood parks and recreation centers, nine community parks and recreational centers, and one regional park within the Wilshire Community Plan area. The closest City of Los Angeles park to the project site is Pan Pacific Park, located at 7600 Beverly Boulevard, which is located approximately 1.20 miles northeast of the project and includes numerous features including an auditorium, barbeque pits, a lighted baseball diamond, indoor and outdoor lighted baseball courts, a children's play area, an indoor gym and picnic tables. In addition, Pan Pacific Park also includes a senior activity center, pool, amphitheater, Los Angeles Museum of the Holocaust, jogging paths, a kitchen, and a stage.

The project site is located within the highly urban Wilshire Community Plan area, which is currently below the standard parkland ratio. The proposed project would generate an estimated 331 residents and 84 employees. Based on the parkland ratio goal of 4 acres per 1,000 residents, the proposed project would generate a need for approximately 1.3 acres (or 56,628 sf) of public parkland. To accommodate the recreational needs of the new residents, the proposed project would provide approximately 26,862 sf of open space, which exceeds the City's required open space of 19,750 square-feet by approximately 1,528 sf. Amenities provided would be a combination of common and private open space. Common open space would include, but not be limited to, courtyards, water features, a pool, gym, spa, and lounge facilities. Employees of the proposed commercial uses are less likely to patronize parks during working hours, and are more likely to use parks near their own homes during non-work hours. Thus, employees are unlikely to increase the use of parks in the local area. While residents would use the open space and recreational amenities provided by the proposed project, there would also likely be an increase in use of local parks and recreational facilities. Any increase in use of such facilities has the potential to deteriorate conditions to the extent that additional or new recreational facilities are needed, the construction of which could cause environmental impacts.

While residents may increase demand for park and recreational services in the local area, this increase in use would be partially reduced or offset by the availability common open space and recreation amenities provided onsite to serve the project residents. Nonetheless, given the increase in use of parks and recreational facilities within the local area there would be a potential impact from increased use of such facilities. To offset this potential impact, the Applicant would be subject to the provisions of the Quimby Act, which requires the payment of fees for park improvements. Pursuant to LAMC Section 12.33, Zone Change Park Fee, which is authorized by the Quimby Act, multi-family residential projects that require a zone change are required to pay a fee to fund park improvements. Given that the proposed project includes a zone change and multi-family residential units, this fee would be applicable. Payment of this fee would ensure that the increased use of parks and recreational facilities by project residents is offset by funding for

park improvements. The payment of these fees to the Park and Recreational Sites and Facilities Fund, combined with the amount of common open space and recreational amenities being proposed, would reduce the proposed project's potential impact on parks and recreational facilities to less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

e. Other governmental services?

Less than Significant Impact. The proposed project site is located in an urbanized and densely populated area of Los Angeles. Library service is provided by the Los Angeles Public Library (LAPL), which includes 72 libraries located throughout the City and includes a collection of over 6.4 million items.

The library branches closest to the project site include the Fairfax Branch, located approximately 1.5 miles east of the project site at 161 South Gardner Street; and the Robertson Branch, located approximately 2.3 miles southwest at 1719 South Robertson Boulevard.[120] Under the 1998 Library Bond Program, which improved, renovated, expanded, and constructed 35 branch libraries throughout Los Angeles, the Fairfax Branch was expanded from 5,230 to 12,500 sf and was completed in September 2005.[121] The Robertson Branch was expanded from a 3,505 sf building to 10,500 sf facility.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors: the net population increase resulting from the proposed project; the demand for library services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and whether the project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct support to the LAPL.

The Los Angeles Public Library Facilities Plan established criteria for the size of libraries. The plan recommended building 10,500 sf facilities for communities with less than 50,000 population and 12,500 sf libraries for communities with more than 50,000 population.[122] The proposed project is located within the Wilshire Community Plan area, which has a population of 287,078 people. Within the Wilshire Community Plan or immediately adjacent to its borders, there are nine public libraries, including the Fairfax and Roberson Public Libraries described above. The other seven City of Los Angeles Branches in the Wilshire Plan area include the Felipe de Neve branch as 2820 West 6th Street; Memorial branch at 4625 West Olympic Boulevard; Pico Union branch at 1030 South Alvarado Street; Pio Pico- Koreatown branch at 694 South Oxford Avenue;

[120] LAPL, 2015. Accessed at http://www.lapl.org/m on April 1, 2015.
[121] LAPL, 2007. Strategic Plan 2007-2010. Accessed at http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf on April 1, 2015.
[122] City of Los Angeles, 2006. *L.A. CEQA Thresholds Gui*de.

John C. Fremont branch at 6121 Melrose Avenue; Washington Irving branch at 4117 West Washington Boulevard; and Wilshire branch at 149 North St. Andrews Place.

Development of the proposed project would increase demand for library services by increasing the permanent residential population in the area by approximately 331 people. In general, employees of commercial sites are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours.

There are four public libraries within three miles of the project site. The libraries that would serve the proposed project are the Fairfax Branch, the Roberson Branch, the John C. Fremont Branch, and the Memorial Branch and . The Fairfax Branch, John C. Fremont Branch, and Memorial Branch have all indicated that they have existing capacity to serve the proposed project.[123] The Robertson Branch was unavailable for comment at the time this Initial Study was being prepared. Thus, the proposed project would be adequately served by existing library services and would not require new or physically altered facilities. Impacts would be less than significant and no mitigation is required. This topic will not be further discussed in the EIR.

Significance: Less than significant.

Cumulative Public Services Impacts

Fire Protection Services

The 53 related projects that are proposed in the City of Los Angeles, as shown on Table A-1 and Figure A-17 would result in a population increase within the City, as described in Section 13, *Population and Housing*. The population generated by these related projects, combined with the proposed project, would increase the demand for fire protection services from LAFD. Specifically, there could be increased demand for additional LAFD staffing and equipment, which could result in the expansion or new fire protection facilities, the construction of which has the potential to cause significant environmental impacts. However, population generated by these related projects would generally be dispersed throughout the greater Los Angeles area and would not necessarily be served by the same fire station that serves the project site. Furthermore, similar to the proposed project, each related projects would each undergo CEQA review by the LAFD and the City of Los Angeles in order to determine if there are any impacts to fire protection services and, if so, to adequately mitigate these impacts. As described above, the proposed project would install adequate fire protection systems and, thus, would not result in the need for new or physically altered governmental facilities, the construction of which could cause a significant environmental impact. Thus, the proposed project's contribution to fire protection service impacts would not be cumulatively considerable. Adequate CEQA review and implementation of associated mitigation measures would ensure that the related projects do not contribute to a cumulatively considerable impact. Therefore, cumulative impacts to fire protection services would be less than significant.

[123] City of Los Angeles Public Libraries, Personal communication with various LAPL staff, December 14, 2015.

Police Protection Services

As shown on Figure A-17, and described in Table A-1, there are 53 related projects that would contribute to population growth within the vicinity of the proposed project. The population generated by these related projects could increase the demand for police services from LAPD. Based on the 3 persons per dwelling unit calculation implemented by the LAPD, the related projects located within the Wilshire Community Plan area would add approximately 2,916 residential units, generating approximately 8,748 new residents. It is possible that additional officers would be necessary in the future to accommodate growth associated with the proposed project in combination with the related projects. Any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. In addition, similar to the proposed project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. In addition, the proposed project and most of the related projects include infill development which would revitalize the surrounding area. Ongoing revitalization and renewal efforts would help reduce the cumulative crime impacts in the area. Therefore, cumulative impacts would be less than significant.

Schools

The proposed project, in combination with the related projects, would result in a cumulative population growth of approximately 6,649 new residents and, consequently, would increase the demand for school services in LAUSD.[124] Development of the related projects would likely generate additional demands upon school services within LAUSD. However, students generated by these related projects would generally be dispersed throughout the greater Los Angeles area and would not necessarily attend the same schools as students generated by the proposed project. As shown in **Table 10,** the proposed project and related projects would cumulatively contribute approximately 627 elementary school students, 303 middle school students, and 305 high school students to the LAUSD. Cumulatively, the proposed project and related projects would contribute a total of approximately 1,235 students to LAUSD.

[124] Population is based on the Wilshire Community Plan 2014 population generation rate of 2.28 persons per residential unit. 2.28 persons per residential unit x 2,916 cumulative residential units = 6,649 persons.

TABLE 10
PROJECTED CUMULATIVE STUDENT POPULATION

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students by Land Use Type
Multi-Family Residences[a]	2,916 du	596	289	291	1,176
Retail[b c]	1,314,469 sf	20	9	9	38
Offices[d e]	443,429 sf	11	5	5	21
Cumulative Total		627	303	305	1,235

Notes:
sf= square feet; du = dwelling units

[a] Student generation rates are as follows for residential uses: .2042 elementary, .0988 middle and .0995 high school students per unit.
[b] Student generation rates are as follows for retail uses: .0149 elementary, .0069 middle and .0067 high school students per 1,000 square feet per unit.
[c] Retail includes bar, restaurant, gas station with mini-mart, health club, spa, convention center expansion, event facility, community center, bowling alley, supermarket, museum, performing arts, plaza house, education center, and cinema uses.
[d] Student generation rates are as follows for office uses: .0233 elementary, .0108 middle and .0104 high school students per 1,000 square feet.
[e] Office includes conference center, assembly hall, government building, jail, courthouse, production studio, bus maintenance and inspection facility, child-care facility, high school, middle school, elementary school, charter school, and university uses.

There are three schools that would serve the project site are Rosewood Elementary School, Burroughs Middle School, and Fairfax High School. As shown in **Table 11**, all three schools have remaining capacity (308, 551, and 1,127, respectively) to serve the proposed project. However, when combined with the related projects, there is insufficient capacity Rosewood Elementary School to serve elementary school students from the proposed project and related projects. However, as noted above, the students generated by the related projects would generally be dispersed throughout the greater Los Angeles area and would not necessarily attend the same schools as students generated by the proposed project. As described above in Table 8, the proposed project would generate approximately 16 elementary school students. Given that this is well within the remaining capacity of 308 students at Rosewood Elementary School, the proposed project's contribution of elementary students would not be cumulatively considerable. Furthermore, like the proposed project, related projects that generate students would be responsible for paying mandatory school fees to LAUSD pursuant to SB 50. Payment of these fees would offset and reduce the potential impact of additional student enrollment in LAUSD generated by the related projects. Therefore, cumulative impacts on schools would be less than significant.

TABLE 11
EXISTING STUDENT ENROLLMENT

School	Location	Student Enrollment		
		2014/2015 Enrollment	Total Capacity	Remaining Capacity
Rosewood Elementary School	503 North Croft Avenue, Los Angeles, CA 90048	316	624	308
Burroughs Middle School	600 S McCadden Place, Los Angeles, CA 90005	1,849	2,400	551
Fairfax High School	7850 Melrose Avenue, Los Angeles, CA 90046	2,111	3,238	1,127

Capacity information was obtained from the 2006 City of Los Angeles CEQA Thresholds Guide, City of Los Angeles Environmental Affairs Department.

2014/2015 student enrollment information was obtained from the Los Angeles Unified School District, official website, accessed December 17, 2015.

Recreation

As discussed above, the project would have a less than significant impact on recreational resources. As shown on Figure A-17, and described in Table A-1, there are 53 related projects that would contribute to population growth within the vicinity of the proposed project. The population generated by these related projects could increase the demand for parks and recreational facilities within the City of Los Angeles. However, like the proposed project, each of the related projects would be required to pay either the City's mandatory Dwelling Unit Construction Tax or Quimby Fees to offset the potential increase in demand for parks and recreational facilities in the local area. Therefore, development of the proposed project and related projects would have a less than significant cumulative impact on parks and recreational facilities.

Libraries

As described above, the proposed project would have a less than significant impact to public libraries in the project vicinity and, as such, would not result in a cumulatively considerable contribution to library services. The Fairfax Branch, John C. Fremont Branch, and Memorial Branch have all indicated that they would be able to accommodate the cumulatively projected 6,649 new residents.[125] Thus, cumulative impacts to libraries would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

[125] City of Los Angeles Public Libraries, Personal communication with various LAPL staff, December 14, 2015.

15. Recreation

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

Less than Significant Impact. According to the *L.A. CEQA Threshold Guide*, the determination of significance shall be made on a case-by-case basis, considering the following factors: the net population increase resulting from the proposed project; the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand, and whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

As described above in Impact 14d., the proposed project would provide common open space and recreation amenities which would be used by residents of the project. In addition, pursuant to the Quimby Act, the Applicant would be required to pay the Zone Change Park Fee, which would offset potential impacts from an increase in use by project residents of parks and recreational facilities within the vicinity of the project site. Overall, as discussed in Section 13a., the proposed project would generate approximately 331 residents, which is approximately 1.3 percent of the full build-out potential of the Wilshire Community Plan area. This is considered a negligible increase when compared to the total build-out potential of the Wilshire Community Plan area. Thus, the proposed project's overall increase in population is considered negligible and, thus, residents from the proposed project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Given the proposed project's negligible population growth, the provision of onsite recreation amenities, and the payment of fees to the Park and Recreational Sites and Facilities Fund, the proposed project's impacts on recreational resources would be less than significant and no mitigation measures are required. This topic will not be further evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. As described above, the proposed project would provide 26, 862 sf of recreational amenities, including a 4,352 sf amenity deck (spa, pool, lounge, and gym), 22,510 sf of open space areas, both public and private. The primary purpose of this environmental review is to evaluate the potential impacts of implementing the proposed project. Given that the recreational amenities are considered part of the proposed project, the analysis of the construction or expansion of such facilities as it relates to the project is evaluated throughout this Initial Study

and, subsequently, in the EIR. Thus, an analysis of potential impacts associated with the construction of these facilities is no included in this analysis.

According to the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. Construction or expansion of any park or recreational facilities is not proposed as a part of this project. As described above, while the proposed project would increase the use of parks and recreational facilities in the area surrounding the project site, this increase would not warrant the construction or expansion of additional recreational facilities, the construction of which could have an adverse physical effect on the environment. The proposed project has the potential to increase the use of parks such that deterioration would occur; however, the Applicant would be required to pay the Zone Change Park Fee, pursuant to the Quimby Act, which would require a payment of fees to fund park improvements and, thus, would minimize project impacts on local parks and recreation facilities. Therefore, impacts on parks and recreational facilities would be less than significant and no mitigation measures are required. This topic will not be evaluated further in the EIR.

Significance: Less than significant.

Cumulative Recreation Impacts

As shown on Figure A-17, and described in Table A-1, there are 53 related projects that would contribute to population growth within the vicinity of the proposed project. The population generated by these related projects could increase the demand for parks and recreational facilities within the City of Los Angeles. However, like the proposed project, each of the related projects would be required to pay either the City's mandatory Zone Change Park Fee or Quimby Fees to offset the potential increase in demand for parks and recreational facilities in the local area. Therefore, development of the proposed project and related projects would have a less than significant cumulative impact on parks and recreational facilities.

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16. Transportation and Circulation

Would the project:

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

Less than Significant Impact. The proposed project would result in the development of 145 residential units, 27,685 sf of commercial retail, and 3,370 sf of commercial restaurant uses and would generate a new residential, visitor, and employment population at the project site. Thus, the

proposed project would result in an increase in daily (1,947 vehicle trips) and peak-hour traffic (101 AM peak hour vehicle trips and 183 PM peak hour vehicle trips) within the project vicinity.[126] The City's *L.A. CEQA Thresholds Guide* requires the evaluation of transportation analysis to address the following areas of study under all or certain circumstances: (1) Construction Traffic; (2) Intersection Traffic; (3) Neighborhood Street Segments; (4) Regional Public Transit System; (5) Site Access; (6) Bicycle, Pedestrian, and Vehicular Safety; and (7) Parking and Bicycle Facilities. Access to the project site is provided by major roadways (La Cienega Boulevard, San Vicente Boulevard, and 3rd Street). Thus, traffic distribution by the project through residential neighborhoods is unlikely, given that the surrounding residential areas do not provide direct access to the site. Thus, there is no analysis of neighborhood street segments. The following is a summary of the proposed project's potential traffic and circulation impacts.[127]

Construction

This increase would add construction traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the project site; however, given that the proposed project would not impede emergency access or add unreasonable amounts of construction traffic and would implement a Construction Traffic Management Plan, construction traffic impacts are anticipated to be less than significant.

Operation

Once construction is complete, the project's residents, employees, and visitors would generate daily vehicle and transit trips that could adversely affect the existing capacity of the street system or exceed the established level of service standard. To determine impacts for intersection traffic, the estimated project traffic volumes during the morning and afternoon peak periods were added to the existing morning and afternoon peak period traffic volumes to determine the change in the volume-to-capacity ratios for signalized intersections and determining the corresponding level of service (LOS). Under the proposed project, 23 of 25 signalized intersections would operate on LOS D or better during both the morning and afternoon peak period. Two intersections would operate at LOS E or worse during the morning and after peak period. However, the addition of project traffic to existing conditions would increase the V/C delay by less than 0.005 and, therefore, would not result in a substantial change to the volume-to-capacity ratio and would not exceed the City's established significance thresholds. Thus, impacts to intersections LOS are anticipated to be less than significant.

In addition to vehicle trips, the proposed project would generate approximately 37 net transit trips in the AM peak hour and 77 net transit trips in the PM peak hour. The project's contribution of transit trips to the transit system would be less than one percent of the total transit capacity. Given

[126] The Mobility Group, 2015. 333 La Cienega Boulevard Project Traffic Study prepared March 17, 2015 (see Appendix G).
[127] Ibid.

this negligible increase, it is anticipated that the project's impact on the regional public transit system would be less than significant.

As described further below, under Section 16d., the project site would be served by the six driveways locations (see Figure A-3 in Attachment A: Project Description), which includes four driveways on San Vicente Boulevard and two driveways on La Cienega Boulevard. A LOS analysis for the unsignalized intersection was conducted, as described further in Appendix G, Traffic Study. As described therein, the project driveways would be designed to minimize any circulation conflicts associated with construction and/or operation and, thus, impacts are anticipated to be less than significant.

Bicycle, pedestrian, and vehicle access locations on the project site would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. The proposed driveways would be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, as required. As the proposed project would maintain the existing sidewalk and circulation system, the project would not disrupt bicycle flow along Burton Way or San Vicente Boulevard. Additionally, to encourage bicycle use, bicycle parking spaces and amenities would be provided within the project site. Given that the proposed project would maintain the existing sidewalk and circulation system and include streetscape and walkability improvements, it is not anticipated that the proposed project would increase hazards to bicyclists, pedestrians or vehicles and impacts are anticipated to be less than significant.

Based on the parking requirements of the LAMC, the proposed project would be required to provide 217 parking spaces for the residential use (factoring in 15 percent bicycle conversion reduction) and 119 parking spaces for the commercial use (factoring in the 30 percent bicycle conversion reduction). The proposed project would provide a total of 362 parking spaces, 119 parking spaces for commercial-retail use, 218 parking spaces for residential uses, and 25 spaces reserved for the mixed-use development at 8500 Burton Way as required by Condition No. 11 in Ordinance 180766.[128] In addition, the proposed project would supply bicycle parking spaces in accordance with LAMC Ordinance No. 182386. Therefore, it is anticipated that the proposed project would provide sufficient parking to comply with the minimum applicable parking requirements in the LAMC.

Given that the proposed project would not add unreasonable amounts of construction and/or operational traffic, it is not anticipated that the proposed project would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system; however, this issue will be evaluated further in the EIR as a matter of public interest.

[128] Condition requires 25 spaces for employee parking within 500 feet of 8500 Burton Way development. To the extent this parking is not provided on the project site, the 25 spaces would be allocated for residential uses.

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

No Impact. The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a state-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement project. The CMP for Los Angeles County requires an analysis of any proposed project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the AM or PM weekday peak hours. This analysis considers future traffic volumes with the proposed project traffic conditions. As described further in the 333 La Cienega Boulevard Project Traffic Study prepared by the Mobility Group in March 2015 (Appendix G), at the intersection of La Cienega Boulevard and Wilshire Boulevard, the project would add 52 trips, which would be slightly higher than the arterial CMP station analysis threshold of 50 trips. However, this intersection would operate at a level of service (LOS) E with or without the project, with an increase of the volume to capacity (V/C) ratio of 0.002 due to the project in the AM peak hour (see Table 4.2 in Appendix G); and operate at LOS F with or without the project, with an increase of the V/C ratio of 0.004 due to the project in the PM peak hour (see Table 4.3 in Appendix G). The CMP methodology identifies that a significant impact would occur if an intersection operates at LOS F and has an increase of V/C ratio of greater or equal to 0.02. During the AM peak hour the intersection would operate at a LOS E with a V/C ratio of 0.002, which is below the CMP threshold. While the intersection would operate at a LOS F during the PM peak hour, this is with or without the project and the project would only increase the V/C ratio by 0.004 in the PM peak hour and, thus, would be below the CMP threshold. Therefore, there would be no significant impact at this intersection. In addition to this intersection, the project would add a maximum of 19 trips at La Cienega Boulevard and Santa Monica Boulevard, three eastbound peak hour trips to the CMP freeway monitoring station located at Interstate 10 (I-10), east of Overland Avenue, and three westbound peak hour trips to the CMP freeway monitoring station located at I-10, east of La Brea Boulevard.[129] Project related trips would be well below the CMP threshold of 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location; therefore, the project would not conflict with the local CMP. There would be no impact and no mitigation measures would be required. Therefore, this topic will not be evaluated in the EIR.

Significance: No impact.

[129] The Mobility Group, 2015. 333 La Cienega Boulevard Project Traffic Study prepared March 17, 2015 (See Appendix G).

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less than Significant Impact. The project site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the project does not propose any uses that would increase the frequency of air traffic. The project would be a maximum height of 240 feet and would be required to comply with the Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures pursuant to Chapter 2, Section 20 Structures to be Marked and Lighted, of the Obstruction Marking and Lighting Guidelines.[130] This requires any temporary or permanent structures that exceed an overall height of 200 feet above ground level to be normally marked and/or lighted. Compliance with this regulation would ensure that impacts related to a change in air traffic patterns would be less than significant and no mitigation measures are required. Thus, this topic will not be evaluated in the EIR.

Significance: Less than significant.

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

Less than Significant Impact. The project would not alter the existing roadway configuration within the project vicinity. In addition, the project would not include any dangerous design features, including sharp curves or dangerous intersections, onsite or offsite. Furthermore, the project does not propose any hazardous or incompatible uses.

The project site would be served by the six driveways locations (see Figure A-3 in Attachment A: Project Description), which includes four driveways on San Vicente Boulevard and two driveways on La Cienega Boulevard. The southernmost driveway on San Vicente Boulevard would be restricted to residential valet use only. This driveway would limit access to inbound right turns from northbound San Vicente Boulevard. The second driveway on San Vicente Boulevard would provide access to the above-ground garages and would restrict access to residential use only. This driveway would limit access to right-in and right-out from northbound San Vicente Boulevard. The third driveway would provide garage entry for underground parking for retail customers and would provide for a southbound left-turn from San Vicente Boulevard and a right-in/right-out access from northbound San Vicente Boulevard. The fourth driveway would provide access for delivery trucks to the loading dock and would be limited to left turn ingress from southbound San Vicente Boulevard. Egress from this driveway would be provided via a right-out on southbound La Cienega Boulevard. The southernmost driveway on La Cienega Boulevard is located at the signalized intersection of La Cienega Boulevard and Blackburn Avenue. This driveway would provide access for residential and restaurant valet uses and would continue to operate as a full-movement intersection with the exception of the eastbound and

[130] Federal Aviation Administration (FAA), 2007. Obstruction Marking and Lighting. Accessed at http://www.faa.gov/documentlibrary/media/advisory_circular/ac%2070%207460-1k.pdf on August 31, 2015.

westbound through movements and the outbound left turn movement which would continue to be prohibited.

As described above, all of the driveways, except for the southern driveway on La Cienega Boulevard at Blackburn Avenue, would be unsignalized. A LOS analysis for these unsignalized driveways was conducted using the Highway Capacity Manual (HCM) method and is shown in **Table 12**.

As shown, the LOS for all driveways was estimated to be LOS B or better in both the AM and PM peak hours. Thus, the project driveways would be designed to minimize any circulation conflicts associated with construction and/or operation and impacts would be less than significant.

TABLE 12
FUTURE WITH PROJECT CONDITIONS – DRIVEWAY ANALYSIS AM AND PM PEAK HOURS

	Future With Project AM Peak Hour		Future With Project PM Peak Hour	
Intersection	**Delay**	**LOS**	**Delay**	**LOS**
South Driveway at San Vicente Boulevard[1] – Northbound inbound right turn	N/A	N/A	N/A	N/A
Central Driveway at San Vicente Boulevard – Westbound outbound right turn	11.5	B	11.0	B
North Driveway at San Vicente Boulevard (Truck Only) – Southbound inbound left turn	N/A	N/A	N/A	N/A
North Driveway at San Vicente Boulevard[2]				
Southbound Inbound Left Turn	9.8	A	9.5	A
Westbound Outbound Right Turn	11.7	B	12.1	B
Driveway at La Cienega Boulevard (signalized)	0.277	A	0.297	A

Notes:
1 Only northbound inbound right turn allowed at this driveway. No delay for this movement.
2 Only truck trips allowed at this driveway. Negligible truck volume.

Source : Mobility Group, 2015[131]

Furthermore, project driveways are required to be designed in accordance with City of Los Angeles Department of Transportation (LADOT) standards and approvals and would be reviewed by the Bureau of Engineering and LADOT, to ensure that design features that reduce accidents are incorporated. Therefore, the proposed project would not substantially increase hazards due to a dangerous design feature, or incompatible use and impacts would be less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

[131] The Mobility Group, 2015. Revised 333 La Cienega Boulevard Project Traffic Study prepared October 13, 2015 (see Appendix G).

e. Result in inadequate emergency access?

Less than Significant Impact. The proposed project would be required to meet all applicable local and state regulatory standards for adequate emergency access. According to the Safety Element of the Los Angeles General Plan, the project site is located along a designated disaster route on La Cienega Boulevard.[132] While the majority of construction activities for the proposed project would be confined to the project site, limited offsite construction activities, such as utility relocations, delivery of materials for certain construction procedures, and/or construction staging, may occur in adjacent street rights-of-way and potentially require temporary lane closures. Specifically, the following closures would occur:

- San Vicente Boulevard: During the entire construction period, it is anticipated that part of the east side roadway of San Vicente Boulevard would need to be closed adjacent to the project site. It is expected that this could be accomplished by closing the parking lane and the bicycle lane, and retaining the two northbound traffic lanes.

- La Cienega Boulevard: During the demolition and excavation phase of construction (approximately four months), the project would likely need to close one southbound traffic lane on La Cienega Boulevard. During the remainder of the construction period (approximately 18 months), it is likely that the project may need at certain times to implement temporary and intermittent closure of one southbound lane on La Cienega Boulevard for material deliveries. It is expected that if necessary this would occur during off-peak traffic hours.

While it is unlikely, this could result in a potential impact to emergency access should a disaster happen during project construction. To ensure that emergency access is maintained throughout construction, the Applicant would implement PDF-3, which requires the preparation of a Construction Traffic Management Plan (CTMP). The CTMP would include traffic control measures that would be implemented during project construction, thereby reducing potential impacts associated with interruption of emergency access during construction. To ensure that emergency access is maintained throughout construction, the CTMP would include a disaster route detour plan. The detour plan would detail a route that would be taken in the case that a temporary lane closure is required during project construction. This detour route would ensure that the disaster route is maintained at all times during project construction. The CTMP would be reviewed and approved by the LADOT prior to being implemented. Therefore, compliance with the measures contained in the CTMP, as implemented by PDF-3, would ensure that impacts in regard to emergency access would remain less than significant. No mitigation measures are required and this topic will not be discussed further in the EIR.

Project Design Feature

Project Design Feature PDF-3: A Construction Traffic Management Plan (CTMP) shall be prepared by the project Applicant and submitted to the LADOT for review and approval. The CTMP would formalize how construction would be carried out and identify actions that

132 City of Los Angeles, 1996. General Plan Safety Element, Exhibit H Critical Facilities and Lifeline Systems,

would be required to reduce effects on the surrounding community. The CTMP shall include street closure information, a detour plan, haul routes and a staging plan, as well as the following elements, as appropriate:

- Identify the specific haul route for trucks and include locations of off-site truck staging and detail measures to ensure trucks do not travel through nearby residential neighborhoods.

- Construction related deliveries, haul trips, etc. should be scheduled to occur outside the commuter peak hours to the extent feasible.

- Establish requirements for the loading, unloading and storage of materials on the project site.

- Establish requirements for the temporary removal of street parking spaces along San Vicente Boulevard, time limits for the reduction of travel lanes and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and local businesses.

- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses, including a detour plan for emergency access along La Cienega Boulevard.

- Notify all emergency service providers of the CTMP after approval by LADOT.

Significance: Less than significant.

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant Impact. The project site is located in an area well served by public transportation. Within a three block radius of the project site, Metro operates nine bus lines, LADOT operates one local DASH route, Antelope Valley Transit operates one bus line, and the City of West Hollywood operates a city-wide bus service.[133] In addition, the proposed project is located approximately three blocks north of the proposed light-rail station which will be constructed at Wilshire Boulevard and La Cienega Boulevard as a part of the Metro Purple Line Subway Extension. Construction of this nine-mile extension began in 2015 and is expected to be completed by 2035, with the La Cienega station opening in 2023. Once operational, this station would provide greater public transit options to project residents and members of the community.

The project site is located in a highly pedestrian-oriented and bicycle accessible area that is a mix of residential uses, institutional, and regional commercial uses, such as, but not limited to, the Beverly Center, Beverly Connection, and Cedars-Sinai Medical Center. The project would

133 The Mobility Group, 2015. 333 La Cienega Boulevard Project Traffic Study prepared March 17, 2015 (see Appendix G).

include significant streetscape and walkability improvements that would make it easier and safer for the community to access the project site and adjacent locations and for project residents to access other parts of the community. In addition, the project site is accessible to bicycles. According to the City of Los Angeles 2035 Mobility Element of the General Plan, the project site is located along San Vicente Boulevard, which has been classified as a Tier II bicycle lane, Burton Way, which has been classified as a Tier I protected bicycle lane, and 3rd Street, which has been classified as a Tier II bicycle lane.[134] Access to these pedestrian and bicycle facilities have the potential to be temporarily disrupted while the project is under construction. Given this potential, this topic will be evaluated in the EIR.

Cumulative Transportation and Circulation Impacts

Development of the proposed project in conjunction with the 53 related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Wilshire Community Plan Area. As described herein, the CMP analysis considers future traffic volumes, including the 53 related projects, with project traffic conditions. While the intersection of La Cienega Boulevard and Wilshire Boulevard would add 52 trips, which is slightly higher than the CMP screening threshold of 50 trips, this intersection would operate at a LOS E, with a V/C ratio of 0.002, during the AM peak hour and at a LOS F, with a V/C ratio of 0.004, during the PM peak hour. While the intersection would operate at a LOS F during the PM peak hour, this is with or without the project and the project would only increase the V/C ratio by 0.004 in the PM peak hour and, thus, would be below the CMP threshold. All other intersections would be below the CMP thresholds. Given that the project related trips would be below the CMP thresholds, the proposed project would not individually or cumulatively exceed LOS standards established by the CMP. Therefore, the project would not conflict with the local CMP, and there would be no cumulative impact.

While the proposed project would construct a structure with a maximum height of 240 feet, the project site is located within an urbanized setting and not within two miles of an airport or air strip and, thus, would not have an impact on air traffic patterns or increase air traffic levels that would result in a safety risk. Similarly, the related projects are not located within two miles of airport or air strip and would be required to comply with the FAA requirements. Therefore, the related projects are not anticipated to result in an increase in air traffic levels or result in impacts related to a change in air traffic patterns and, thus, cumulative impacts would be less than significant.

As described herein, the proposed project would not alter the existing roadway configuration within the project vicinity; would not include any dangerous design features, including sharp curves or dangerous intersections, onsite or offsite; and does not propose any hazardous or incompatible uses. Given the project's design features, impacts would be less than significant and the proposed project would not make a cumulatively considerable contribution to hazards associated with project features or incompatible uses. Related projects in the area would be

[134] City of Los Angeles, 2035 Mobility Element of the General Plan, http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf, 2015, accessed November 11, 2015.

required to be designed to minimize hazards associated with project features or incompatible uses consistent with City requirements. Each related project would likely undergo CEQA review to assure that any impacts are appropriately evaluated and, if necessary, mitigated. Thus, it is likely that cumulative impacts would be less than significant.

17. Utilities and Service Systems

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than Significant Impact. The LARWQCB implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. The LARWQCB's Water Quality Control Plan for the Los Angeles Region ("the Basin Plan") establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay. Wastewater reclamation and treatment in the City of Los Angeles is provided by the LADPW, Bureau of Sanitation, which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LARWQCB and/or water reclamation requirements of the Basin Plan.

The project site is developed with a vacant three-story structure; however, historically, this site has been in use and has generated wastewater. Wastewater generated during operation of the proposed project would be typical of residential, retail, and restaurant uses. Wastewater generated at the project site would be collected and discharged into the existing 21-inch sewer main in La Cienega Boulevard.

Wastewater from the project site would then be conveyed and treated at the Hyperion Treatment Plant (HTP), which is located on a 144-acre site adjacent to Santa Monica Bay. The HTP is the largest wastewater treatment facility in the City and has been designed to treat 450 million gallons per day (mgd) to full secondary treatment, and currently treats and average daily flow of approximately 362 mgd.[135] Thus, the remaining capacity is approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to 5 mgd. This allocation allowance is monitored by HTP and the proposed project's contribution would not affect the amount. Furthermore, HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. As the HTP is in compliance with the State's wastewater treatment requirements,

[135] County of Los Angeles Department of Public Works, 2011 Annual Report, Los Angeles Countywide Integrated Waste Management Plan, October 2013.

the project would not exceed the wastewater requirements of LARWQCB.[136] Therefore, the proposed project would have a less than significant impact with regard to wastewater treatment requirements and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water service to the project site is currently supplied by LADWP for domestic and fire protection services. Sewer service is provided by the City of Los Angeles Bureau of Sanitation. The project site is currently developed with a three-story structure (vacant department store and parking lot) and associated landscaping. There is existing infrastructure in place including a water service system and wastewater conveyance system. The proposed project would connect to these systems using both existing and new connections, as described further below. The proposed project would develop 145 residential units and 31,055 sf of commercial uses, including restaurant and retail, and, thus, would generate increased demand for water and wastewater at the project site.

Water Consumption

The LADWP ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water in Los Angeles comes from a network that delivers water from a variety of sources including the Los Angeles Aqueducts, local groundwater, and supplemental water purchased from the Metropolitan Water District of Southern California (MWD). The water from MWD is delivered through the

[136] City of Los Angeles, LA sewers, official website, http://www.lasewers.org/treatment_plants/hyperion/index.htm, accessed April 1, 2015.

Colorado River Aqueduct and reliable and the State Water Project's California Aqueduct.[137] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[138]

Water service to the project site would continue to be supplied by LADWP for domestic and fire protection uses. The LADWP provides water service to the project site via an existing 6-inch water main in La Cienega Boulevard. As shown in **Table 13**, it is estimated the proposed project would consume a net demand of 38.2 acre feet per year (AFY) or approximately 34,080 gallons per day (gpd) of water, which is below available capacity. In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated water demand was based on 120 percent of the sewerage generation factors for residential and commercial categories.[139] Consequently, implementation of the proposed project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the proposed project would have a less than significant impact.

While domestic water demand is typically the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and, therefore, are the primary means for analyzing infrastructure capacity. Fire flow to the project would be required to meet City of Los Angeles fire flow requirements. Section 57.09.06 of the Los Angeles Municipal Code establishes fire flow standards by development type. The project falls within the High Density Residential and Neighborhood Commercial category, which has a required fire flow of 4,000 gallons per minute (gpm) from four adjacent fire hydrants flowing simultaneously. There are five existing fire hydrants in the immediate vicinity of the project site. Three are located on La Cienega Boulevard, two on the sidewalk adjacent to the project site and one on the east side of La Cienega Boulevard between West 4th Street and San Vicente Boulevard. One is located east of La Cienega Boulevard, one on the south side of Blackburn Avenue and one is located on the west side of San Vicente Boulevard, on the sidewalk adjacent to Our Lady of Mount Lebanon-St. Peter Cathedral. An LADWP Fire Service Pressure Flow Report would be obtained from LADWP during the permit approval to ensure that existing water pressure is sufficient to serve the fire flow needs of the project. It is also possible that additional onsite or offsite fire hydrants might be required in order to meet Fire Department regulations for building coverage. However, all

[137] Los Angeles Department of Water and Power (LADWP), website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply?_adf.ctrl-state=1b53vxi3v8_4&_afrLoop=1248174140118915. Accessed October 2015.
[138] LADWP, website: https://www.ladwp.com. Accessed October 2015.
[139] The City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005. http://www.lacity.org/san/general info/about us/our services/overview of services.pdf.

TABLE 13
PROJECT WATER DEMAND CALCULATIONS

Facility Description	Water Consumption Factors	Facility Quantities	Average Flow (GPD)	Annual Flow (AFY)
Retail Area (less than 100,000 SF)	27.5/1,000 Gr sf	26,906	740	*0.8*
Restaurant Take Out	33 seats	135	4,455	*1.1*
Residential - Condo - 1 BDR	121 du	84	10,164	*11.4*
Residential - Condo - 2 BDR	165 du	56	9,240	*10.4*
Residential - Condo - 3 BDR	209 du	5	1,045	*1.2*
Residential - Condo - Greater than 3 BDR	40/Bed	5	200	*0.2*
Health Club/Spa	715/1,000 Gr sf	10,420	7,522	*8.4*
Parking Lot	22/1,000 Gr sf	170,500	3,751	*4.2*
Landscaping/Open Space[1]	1 AF/Acre	19,425		*0.5*
			Total (AFY)	***38.2***

Notes:
[1] Not included in sewer generation calculations. Assumes no sewage generation from these items.
Source: Stantec, 2015

project-related infrastructure would be designed and installed to meet all applicable City requirements. Therefore, impacts with respect to fire flow and available water pressure would be less than significant.

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the project area, and would not create a significant impact to the physical environment. This type of work would be short-term in nature, would replace existing mains in the public right-of-way, and would be limited to the immediate project vicinity. Thus, any potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater

The proposed project site is currently developed and is served by the existing wastewater conveyance system. Wastewater that is generated is currently conveyed via the existing wastewater conveyance systems for treatment at the HTP, as described under Impact 17a. The Bureau of Sanitation provides sewer service to the project site via an existing 21-inch sewer main in La Cienega Boulevard and an existing 15-inch sewer line on San Vicente Boulevard. The proposed project would connect to the City's wastewater conveyance system through the existing 21-inch sewer main on La Cienega Boulevard. Sewer service would be provided to the project site by utilizing existing or new onsite sewer connections to the existing sewer mains adjacent to the project site.

As shown in **Table 14,** the proposed project is anticipated to generate approximately 30.5 acre-feet per year (AFY) or approximately 27,229 gpd of wastewater. The wastewater generated by the proposed project would be similar to other residential and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur as the proposed project would be comprised of commercial-retail and residential uses. Additionally, there is adequate treatment capacity within the HTP system (remaining capacity of approximately 88 mgd or at 80 percent capacity) and, thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. A Sewer Capacity Availability Report (SCAR) must be submitted in order to determine the local sewer capacity of the project area in order for the Los Angeles Bureau of Sanitation to assess the ability of the existing wastewater system and ensure that the proposed project would not result in a significant impact. As such, a formal SCAR was submitted to the Bureau of Sanitation by Stantec on October 28, 2015. The SCAR, approved by the Bureau of Sanitation on November 18, 2015, revealed that the sewer system serving the project site would have sufficient capacity to accommodate the sewage needs of the proposed project. As HTP complies with the state's wastewater treatment requirements and the proposed project's wastewater generation is well within the existing capacity, the proposed project would not result in or require the construction of a new wastewater treatment facility.

TABLE 14
PROJECT SEWAGE GENERATION CALCULATIONS

Facility Description	Water Consumption Factors	Facility Quantities	Average Flow (GPD)	Annual Flow (AFY)
Retail Area (less than 100,000 sf)	25/1,000 Gr sf	26,906	673	*0.8*
Restaurant Take Out	300/1,000 Gr sf	3,370	1,011	*1.1*
Residential - Condo - 1 BDR	110 du	84	9,240	*8.6*
Residential Condo - 2 BDR	150 du	56	8,400	*2.4*
Residential - Condo - 3 BDR	190 du	5	950	*13.0*
Residential - Condo - Greater than 3 BDR	40/Bed	5	200	*0.2*
Health Club/Spa	650/1,000 Gr sf	10,420	6,773	*7.6*
			Total (AFY)	**30.5**

Source: Stantec, 2015

Project-related sanitary sewer connections and onsite infrastructure would be designed and constructed in accordance with applicable City of Los Angeles Bureau of Sanitation and California Plumbing Code standards. As a part of the building permit process the City of Los Angeles Bureau of Sanitation would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the proposed project's wastewater flows. The standard procedure is that future detailing gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point if the public sewer has insufficient capacity.

A final approval for sewer capacity and connection permit would be made at the time. In addition, the Applicant would be required to submit all applicable wastewater capacity fees to LADPW, as required. Payment of this development fee is based on the total proposed flow of the project.

In summary, the proposed project wastewater generation would be within the existing capacity and would not result in or require the construction of a new wastewater treatment facility. Furthermore, the proposed project would implement all applicable standards and regulations and pay the required development fees. Implementation of these standards and regulations and payment of the development fees would ensure that impacts regarding wastewater facilities would be less than significant. No mitigation measures are required and this topic will not be evaluated in the EIR.

Significance: Less than significant.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. The proposed project is currently developed with a three-story building and associated landscaping. There is an existing 72-inch storm drain that provides service to the project site. The proposed project would construct a 240-foot mixed-use structure with amenities including open space areas. As described in Section 9c, *Hydrology and Water Quality,* development of the proposed project would not significantly alter the amount of impervious surface that affects runoff, as the proposed project and its surroundings are comprised primarily of paved surfaces. Runoff currently flows toward the existing storm drain system, and the proposed project would not result in a significant increase in the amount of runoff or in any changes in the local drainage patterns. During construction, stormwater runoff would continue to flow toward the existing storm drain system and would have the potential to carry potential sources of stormwater pollution associated with construction activities. However, these impacts would be considered short-term and temporary, and would not require the construction of new stormwater drainage facilities and, therefore, would be considered less than significant.

During operation, and consistent with the existing uses onsite, the project would introduce sources of potential stormwater pollution that are typical of residential, retail, and restaurant uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with NPDES Municipal Permit requirements, the project would be required to implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during the operational life of the project to reduce the discharge of polluted runoff from the project site. The project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. With compliance with these existing regulatory requirements, impacts to water quality during operation would be less than significant and no mitigation measure is required.

Given that the proposed project would not increase runoff to the existing storm drain system, it can be assumed that the existing storm drain system would have sufficient capacity to carry runoff from the proposed project. Therefore, the proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less than Significant Impact. As described above in Section 17b., water service to the project site is provided by the LADWP. The project site is currently developed with a three-story building (vacant department store and parking lot) and associated landscaping. Existing water lines adjacent to the proposed project site include an existing 6-inch water main on La Cienega Boulevard, an existing 8-inch water main on San Vicente Boulevard, and water mains on Burton Way. The proposed project would connect to the existing 6-inch water main on La Cienega Boulevard for water service to the project site.

The proposed project is anticipated to have a water demand of approximately 42 AFY, as calculated through water demand averages in CalEEMod, which is less than one percent of the City's projected 2035 demand of 710,800 AFY. Given this negligible demand, it's anticipated that the City's existing water supply could accommodate the proposed project. In addition, the proposed project would be required to comply with Ordinance No. 170.978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance, and would be required to comply with the California Green Building Standards Code (CALGreen Code) which is Part 11 of the California Building Standards Code and contains standards designed for efficient water use. Senate Bill 610 (SB610) requires all urban water providers that utilize groundwater as a source of water available to the supplier, to include in their Urban Water Management Plan a description of all water supply projects and programs that may be undertaken to meet total projected water use. SB610 prohibits an urban water supplier that fails to prepare or submit the plan to the California Department of Water Resources from receiving funding made available for specified bond acts until the plan is submitted. The bill would further require all entities that concludes that water supplies are, or will be insufficient, to submit plans for acquiring additional water supplies. The identification and development of water supplies during multiple-year droughts is vital to California's environment and economy, and SB 610 contributes to long-term planning with regard to ensuring adequate water supply for future land use developments. New water conservation measures include water reclamation, water conservation, conjunctive use, water transfers, seawater desalination, and surface and groundwater storage. Given the amount of water that would be generated by the proposed project and the implementation of water conservation measures, it is anticipated that the proposed project could be served by existing entitlements and resources and that no new or expanded water supply

entitlements would be needed. Therefore, impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

e. Result in a determination by the wastewater treatment provider which services or may serve the project that it has adequate capacity or service the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. As described in Impact 17b, the proposed project would generate 30.5 AFY of wastewater, which would be sufficiently accommodated as part of the remaining 88 mgd or 80 percent of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. The management of solid waste in the City of Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi- family residential and commercial developments within the City. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 65.78 million tons. Chiquita Canyon Landfill currently has a remaining capacity of 2.9 million tons. Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill combined have a remaining permitted daily intake of approximately 68.8 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 25 years, and the Chiquita Canyon Landfill has an estimated remaining life of 4 years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy).[140]

Solid waste from the proposed project would be sent to Sunshine Canyon Landfill. The proposed project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. As shown in **Table 15,** the proposed project is expected to generate approximately 1,180 tons of solid waste during construction. As shown in **Table 16,** the proposed project is expected to generate approximately 2,658 lbs of solid waste per day or 2.5 tons per week.

[140] County of Los Angeles Department of Public Works, 2013 Annual Report Los Angeles Countywide Integrated Waste Management Plan, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=3473&hp=yes&type=PDF, 2015, accessed October 20, 2015.

TABLE 15
EXPECTED CONSTRUCTION SOLID WASTE GENERATION

Construction Activity	Size	Rate[1,2] (lbs./sf)	Generated Waste (tons)
Construction			
Residential (145 DU)	263,239 sf	4.38	576
Commercial/Retail	31,055 sf	3.89	604
Total Solid Waste			**1,180**

Notes:
sf =square feet; du = dwelling units
1 Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.
2 *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States*, July 1998. [calculation: size (sf) x rate (lbs) / 0.0005 (1 pound=0.0005 tons].

TABLE 16
EXPECTED OPERATIONAL SOLID WASTE GENERATION

Type of Use	Size	Solid Waste Generation Rate [1,2] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Residential	145 du	12.23 lbs/du/day	1,773
Commercial/Retail (84 employees)[3]	31,055 sf	10.53 lbs/employee/day	885
Total Project Solid Waste Generation			2,658

Notes:
sf =square feet; du = dwelling units
1 Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.
2 City of Los Angeles *L.A. CEQA Thresholds Guide (2006*), M.3 Solid Waste, page M.3-2.
3 Employees were projected based on LAUSD generation rate for neighborhood shopping center= 0 .00271 employees/ square foot.

The City of Los Angeles has adopted a Solid Source Reduction Recycling Program and operates an active solid waste recycling program. The proposed project would be required to reduce the total estimated waste output through these established City recycling programs. Under Assembly Bill 939 (AB939), cities and counties in the State of California must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and compositing. The City of Los Angeles established an accelerated goal of 75 percent diversion by 2013. In addition, in compliance with existing City of Los Angeles Department of Building and Safety standards and regulations, the proposed project would be required to recycle construction waste to the maximum extent possible. As a part of these regulations, the Applicant would be required to contract for waste disposal services with a company that recycles demolition and/or construction related wastes. During construction temporary waste separation bins would be provided onsite and would be disposed of properly as a part of the project's regular solid waste disposal program. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly.

As shown above in Table 16, during operation the proposed project would generate approximately 2.5 tons of solid waste per week, which is below the City's significance screening

criteria threshold for analysis of potentially significant impacts of 5 tons per week.[141] The Sunshine Canyon Landfill has a remaining capacity of 65.78 million tons and has indicated it would have sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs. Therefore, the anticipated solid waste demands from the proposed project would not significantly impact the existing capacity of the landfills and no new or expanded solid waste facilities would need to be constructed in order to facilitate the solid waste demand of the proposed project.[142] Therefore, impacts would be considered less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. The City of Los Angeles Bureau of Sanitation has initiated a stakeholder-driven planning process to develop the City's *Solid Waste Integrated Resources Plan* (SWIRP), a long-range master plan for solid waste management in the City. The plan would implement the concept of Zero Waste, where the practice of extraction, consumption, and disposal are shifted from a linear process to a closed loop systems where discarded materials become resources. The vision of Zero Waste is to strive for sustainability while actively maintaining existing programs and seeking new opportunities for diversion.[143] The Solid Source Reduction Recycling Program operates an active solid waste recycling program within the City. The proposed project would be required to reduce the total estimated waste output through these established City recycling programs. In addition, compliance with existing regulations for waste reduction, as well as compliance with the LAMC would ensure that construction waste is recycled to the maximum extent practicable.

Los Angeles County continually evaluates landfill disposal need and capacity through preparation of the Countywide Integrated Waste Management Plan (CoIWMP)-Annual Reports which summarize landfill capacity. In addition, the City of Los Angeles includes numerous plans, policies and regulations that address the future provision of solid waste management services including the LA Solid Waste Management Policy Plan, the General Plan, RENEW LA Plan, the Space Allocation Ordinance (Ordinance No. 171687), Green LA Plan. As described above, the proposed project would not generate a significant amount of solid waste and would comply with applicable federal, state, and local statutes and regulations related to solid waste. Therefore, impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

Significance: Less than significant.

[141] City of Los Angeles *L.A. CEQA Thresholds Guide.* 2006

[142] Sunshine Canyon Landfill, official website, http://www.sunshinecanyonlandfill.com/home/Future.html, Accessed October 2015.

[143] City of Los Angeles, Solid Waste Integrated Resources Plan, http://www.lacitysan.org/srssd/swirp/pdf/2013/2013Oct28SWIRPdocsFINALrd.pdf, 2013. Accessed on April 1, 2015.

Cumulative Utilities and Service Systems Impacts

Water - Supply/Facilities

Through the 2010 Urban Water Management Plan (UWMP), the LADWP has demonstrated that it can provide adequate water supplies and facilities for the City through the year 2035. This estimate is based in part on demographic projections obtained for the LADWP service area from the MWD. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's 2012 RTP. As discussed previously in Section 14, *Population and Housing*, the proposed project would be consistent with the regional and local population and housing growth projections. The proposed project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the project site. As such, the additional water demands generated by the project are accounted for in the 2010 UWMP and impacts associated with the cumulative increase in water demand would be less than significant. Similar to the proposed project, each of the related projects would be required to undergo separate environmental review. Pending consistency with the regional and local population and housing growth projections and LAMC, water demands generated by the related projects would be accounted for in the 2010 UWMP. Thus, the project and related projects would not generate demand for water service beyond what is already projected and cumulative impacts would be less than significant.

Wastewater – Treatment/Facilities

The HTP provides wastewater treatment to the City of Los Angeles and services the project site and surrounding environs. The HTP currently has an 80 percent remaining capacity. As described herein, a SCAR was approved by the Bureau of Sanitation for the proposed project on November 18, 2015, and revealed that the sewer system serving the project site would have sufficient capacity to accommodate the project's anticipated generation of sewage. The projected total flow of the proposed project would be approximately 27,266 gallons per day (gpd) and the project would operate on an approved flow of 100 percent.[144] Given that the existing sewer system could accommodate sewage generated by the proposed project, the proposed project would have a less-than-significant impact on sewer capacity. Similar to the proposed project, all related projects would be required to submit a formal SCAR to the City, in order to determine the available capacity of the sewer infrastructure servicing the site. In addition, the related projects would each undergo CEQA review to assure that any impacts are appropriately evaluated and if necessary mitigated. Given that the HTP has an 80 percent remaining capacity, it is not anticipated that the related projects contribution of wastewater would be cumulatively considerable. Therefore, project and related projects cumulative impacts would be less than significant.

For a discussion of stormwater drainage facilities, please see Section 8, *Hydrology and Water Quality*, Cumulative Hydrology and Water Quality Impacts.

[144] City of Los Angeles Bureau of Sanitation, *Sewer Capacity Availability Request (SCAR) for 333 La Cienega Boulevard*, 2015.

Solid Waste – Landfill Capacity/Regulatory Compliance

As described herein, Sunshine Canyon Landfill would have sufficient capacity to serve the proposed project and, thus, the proposed project would have a less than significant impact and, thus, would not have a cumulatively considerable contribution. The related projects identified in Table A-1 and Figure A-17 would also generate solid waste; however, at this time generation rates are unknown due to the unknown nature of the related projects. However, given the remaining life of the Sunshine Canyon Landfill (25 years), it is anticipated that there would be sufficient capacity for proposed project and the 53 related projects (comprised primarily of commercial, mixed-use residential, residential, and retail uses). Thus, these uses are not anticipated to have a substantial impact on the capacity of the Sunshine Canyon Landfill. Furthermore, like the proposed project, each of the related projects would each undergo CEQA review to assure that any impacts are appropriately evaluated and if necessary mitigated. Therefore, it is likely that cumulative impacts would be less than significant.

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18. Energy Resources

Would the Project:

a. Conflict with adopted energy conservation plans?

Less than Significant Impact. To evaluate impacts on energy resources, the *L.A. CEQA Thresholds Guide* identifies that a determination of significance shall be made on a case-by-case basis, considering the following factors: the extent to which the project would require new (offsite) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; whether and *when* the needed infrastructure was anticipated by adopted plans; and the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements. This section will focus on whether the proposed project would have a conflict with an adopted energy conservation plan and the degree to which the project design and/or operations incorporate energy conservation measures. The discussion on whether the project would require new (offsite) energy supply facilities is included below under Impact b).

There are numerous state and local initiatives being undertaken requiring and encouraging increased energy efficiency and reductions in the amount of energy consumed including:

- Title 24 (CALGreen Code) of the California Code of Regulations establishes energy conservation standards for new construction. These standards relate to insulation requirements, glazing, lighting, shading, and water and space heating systems.
- The U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program is a green building certification program that recognizes best-in-class building strategies and practices.
- The Los Angeles Municipal Code also incorporates CALGreen requirements.

- City of Los Angeles Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (May 2007) mainly includes measures to reduce greenhouse gasses at municipal facilities, but also discusses energy conservation efforts to be implemented for private development within the City.
- The *L.A. CEQA Thresholds Guide* includes suggested design features to encourage energy conservation.
- The City's Conservation Element (2001) and the Infrastructure Element (1995) promote the efficient use of energy resources in the City of Los Angeles.[145] As described further below, the proposed project would promote the efficient use of energy and would not conflict with this element.

The existing three-story structure on the project site contains a vacant department store on the first floor and a parking structure on the two levels and roof above. While the department store is currently vacant, the parking garage is still operational and consuming energy resources, although at a reduced rate. When the building was fully operational, it consumed both non-renewable and renewable energy resources typical of a large department store. The proposed project includes various project components to reduce and minimize to the fullest extent the impact to non-renewable and renewable resources. The project would include characteristics that contribute to energy efficiency and would be subject to the City of Los Angeles Green Building Code regulations that would reduce the demands for energy resources needed to support project operation. Although, the proposed project likely would not achieve Leadership in Energy and Environmental Design (LEED) certification, it would be designed to meet certain LEED standards through the incorporation of green building techniques and other sustainability features. Energy efficient features include, but are not limited to: energy efficiency above that required by Title 24; construction and demolition waste recycling; bicycle storage; storm water treatment features; energy-star rated residential appliances, green roofs to provide open space and reduce solar gain, and HVAC features that improve indoor environmental quality. In addition, in compliance with Ordinance No. 170,978 (Water Management Ordinance), numerous water conservation measures in landscape, installation, and maintenance (i.e., use drip irrigation and soak hoses in lieu of sprinklers) would be implemented, as well as the following interior water efficiency features: high efficient toilets (maximum 1.28 gpf), restroom faucets with a maximum flow rate of 1.5 gallons per minute, and utilizing a self-closing design, installation of demand (tankless or instantaneous) water heater system, no more than one showerhead per shower stall, and the installation of only high efficiency energy-star rated dishwashers. In addition to energy efficiency features, the proposed project would include onsite retail (e.g., a possible specialty market and neighborhood retail), which would serve the project's residents and the surrounding community and reduce the need for additional vehicle trips. The project site is located within easy access to nearby transit lines and would be accessible for residents, retail customers, and employees. The use of public transit would reduce the use of transportation related energy by removing vehicles from the road and, thus, would reduce impacts to non- renewable resources, such as petroleum based fuels.

[145] City of Los Angeles, Conservation Element of the General Plan, http://cityplanning.lacity.org/cwd/gnlpln/ConsvElt.pdf, 2001, accessed November 4, 2015. City of Los Angeles, Infrastructure Element of the General Plan Framework Element, http://planning.lacity.org/cwd/framwk/chapters/09/09.htm#power, 1995, accessed November 4, 2015.

The proposed project would consider and incorporate the above described energy efficient design features. In addition, the project would reduce the use of transportation-related energy by providing housing and neighborhood retail uses within easy access of public transit. The project's energy efficient design features, combined with the project's projected energy use, described in greater detail below, demonstrate that the proposed project would implement energy efficiency and reduction standards consistent with those contained in the adopted energy conservation plans. Given implementation of these energy efficiency features, the proposed project would not conflict with adopted energy plans and impacts would be less than significant. No mitigation measures are necessary and this topic will not be evaluated in the EIR.

Significance: Less than significant.

b. Use non-renewable resources in a wasteful and inefficient manner?

Less than Significant Impact. As described above, the *L.A. CEQA Thresholds Guide* identifies that a determination of significance for energy resources shall consider the extent to which the project would require new (offsite) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities. Pursuant to Appendix F of the CEQA Guidelines, which emphasizes avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy, this section discusses the project's potential impacts on energy resources, focusing on three energy resources: electricity, natural gas, and transportation related energy (petroleum-based fuels). Implementation of the proposed project would result in a mixed-use, 20-story building consisting of 145 residential units and 31,055 sf of commercial uses, including 3,370 sf for a proposed restaurant and 27,685 sf for commercial retail uses. As stated in Section 13, Population and Housing, the proposed project would increase the population in the area by approximately 331 persons.

Electricity

There is an existing underground electrical distributions line on San Vicente Boulevard that provides electrical service to the buildings in the area, including the project site.

Construction of the project would require the operation of electrical equipment. The electrical equipment would include power tools, temporary lighting, lifts, etc. Energy for construction would be supplied by existing electrical sources from nearby utility poles. This type of power is recommended, where feasible, for overall energy efficiency; however, such use would require approval and coordination with LADWP. LADWP would require its standard conditions for temporary use from the power supply, which would ensure compliance with its regulations. Drawing power from nearby utility poles is the preferred and typical practice for energy efficiency and reduction of greenhouse gas emissions. Use of this power source would be intermittent over the phases of construction and within activities being performed on any given day. Given the relatively negligible consumption of electricity that would occur during construction and the availability of LADWP sources as described further below, it is anticipated that the proposed project would be sufficiently served by existing sources. Furthermore, electrical use for construction would be short-term and temporary and would not affect regional energy

consumption in years beyond the construction period. Therefore, the proposed project would not use non-renewable resources in an inefficient manner and construction impacts on electricity consumption would be less than significant.

During operation of the proposed project, electricity would be provided to the project site by LADWP. Future plans regarding the provision of electrical services are presented in regularly updated Integrated Resource Plans (IRPs) that are prepared by the LADWP. These Plans identify future demand for services and provide a framework for how LADWP plans on continuing to meet future consumer demand. The current IRP is based on a 20-year planning horizon. As indicated in the 2014 IRP, LADWP's Power System serves approximately 3.8 million and is the nation's largest municipal electric utility. LADWP experienced an all-time net energy-for-load peak demand of 6,341 megawatts (MW) with an instantaneous peak demand of 6,396 MW on September 16, 2014. To meet such needs as well as future needs, LADWP reported having an installed net dependable generation capacity greater than 7,639 MW.[146] The expected energy sales in 2018-2019 include 22,807 Gigawatt Hours (GWh) of total sales and 25,734 GWh of net energy for load. This leaves a residual of 2,927 GWh of excess capacity. The peak demand during this same period is expected to be 5,534 MW.[147] LADWP is fully resourced to meet peak demand, but maintains transmission and wholesale marketing operations to keep production costs low and increase system reliability.

The proposed project would require consumption of electricity for the operation of new site activities, such as the use of appliances, lighting, etc. The project's estimated annual energy consumption for electricity would be 2,753,499 kWh/year.[148] This rate is based on generation factors provided in the 2013 SCAQMD California Emissions Estimator Model (CalEEMod). As described in Attachment A, Project Description, construction of the proposed project is expected to be completed in 2018. The projected energy use 2018-2019 is expected to be 22,807 GWh, which leaves an remaining capacity of 2,927 GWh. The project's energy consumption at 2,753,499 kWh (2.75 GWh) per year would be approximately 0.012 percent of the estimated 2018-2019 demand of 22,807 GWh per year and 0.09 percent of the projected excess capacity. Given that the project's percentage of excess capacity is a negligible amount, it is not anticipated that the additional resources beyond those already provided by LADWP would be required. Therefore, the proposed project would not use electricity in a wasteful or inefficient manner and there would be a less than significant impact.

Natural Gas

Natural gas is provided to the project site by the Southern California Gas Company (SoCalGas). While SoCalGas is a private utility company, it is regulated by the California Public Utilities Commission (PUC), and provides infrastructure necessary to support existing and future demand for energy services within the community. SoCalGas is part of an association of energy providers, the California Gas and Electric Utilities, which provides a biannual California Gas Report in even

[146] Los Angeles Department of Water and Power (LADWP), 2014 Power Integrated Resources Plan, December 19, 2014, page 17.
[147] LADWP, 2014 Power Integrated Resources Plan, December 19, 2014, Appendix A, page A-5.
[148] Environmental Science Associates, CalEEMod Emissions and Utilities Calculations, 2015.

numbered years with supplement reports in the following years. These reports are prepared pursuant to the California Public Utilities Commission, Decision D.95-01-039.[102] They address the supply of and demand for natural gas resources, as well as strategies for reducing the amount of greenhouse gas emissions pursuant to the California Air Resources Board AB 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. The most recently published report is the 2014 California Gas Report.

The 2014 California Gas Report indicates that SoCal Gas is projected to provide approximately 2,690 million cubic feet per day (MMcfd) on an average day or 982 billion cubic feet (bcf)/year of natural gas by 2018, with a total capacity of 3,875 MMcfd. Future demand is expected to decline at an annual rate of 0.33 percent from 2012 to 2035; however, total capacity would remain the same. The decline is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand and conservation savings linked to Advanced Metering Infrastructure.[149]

An extreme peak day demand is defined as a 1-in-35 likelihood event for a services area. The SoCalGas retail core peak demand in 2018 is forecasted to be approximately 3,024 MMcfd. As noted above, the total capacity through 2018 is 3,875 MMcfd. Thus, there would be a remaining capacity of 851 MMcfd on extreme peak days. According to the 2014 California Gas Report, SoCalGas's storage and flowing supplies are sufficient to meet the forecasted 2018 retail core peak day demand.[150] Demand on an extreme peak day is met through a combination of withdrawals from underground storage facilities and flowing pipeline supplies.

As described above, construction of the proposed project would be powered by electricity and/or gasoline sources and it is not anticipated that natural gas would be consumed. Therefore, the proposed project would not use natural gas in a wasteful or inefficient manner during project construction. Upon completion of construction, the proposed project would add housing units, retail uses, and restaurants uses and, thus, would increase the demand for energy resources on the project site. The new uses would generate onsite residents, visitors, employees, and shoppers whose activities would consume natural gas. The project's estimated annual energy consumption for natural gas would be 2,352,849 thousand British Thermal Units (KBTU) per year. This is estimate is based on generation factors provided in the 2013 SCAQMD CalEEMod. Given that the proposed project would not uses natural gas in a wasteful or inefficient manner and that energy conservation measures, described above, would be implemented, construction and operational impacts on consumption of natural gas would be less than significant.

Transportation-Related Energy

Transportation related energy, or the use of petroleum-based fuels, would be consumed during construction and operation of the project. Transportation related energy used during construction would include trucks delivering equipment and resources to the project site, and vehicles used by

149 2014 California Gas Report, Prepared by the California Gas and Electric Utilities; page 62.
150 2014 California Gas Report, Prepared by the California Gas and Electric Utilities; Page 89.

construction employees accessing the project site. Diesel-fuel would be used during construction for all off-road construction vehicles and haul trucks during demolition, site preparation, grading, building construction and paving activities. The project's estimated annual fuel consumption for transportation-related energy would amount to approximately 84,140.43 gallons of diesel and 42,635.82 gallons of gas over the three year construction period (a total of 24 months). The estimated annual average fuel consumption for construction would be approximately 41,140.08 gallons of diesel and 21,170.89 gallons of gas.[151]

During operation, primary transportation related energy would include vehicles (residents, retail customers, and employees) accessing the project site. This increase in vehicle trips would increase the use of transportation related energy. The project's annual operational fuel consumption of transportation-related energy (diesel and gas) would be approximately 11,540.07 gallons of diesel and 258,517.62 gallons of gas. These rates are typical of a mixed-use, commercial and residential land use.

However, as described above, the proposed project includes various project components to reduce and minimize to the fullest extent the impact to non-renewable and renewable resources. The project would include LEED approved features such as, but not limited to, energy efficiency above that required by Title 24; landscape and interior water efficiency features; construction and demolition waste recycling; bicycle storage; storm water treatment features; and an improved indoor environmental quality. Furthermore, the onsite retail that would in part serve the project's residents (e.g., a possible specialty market and neighborhood retail), and access to nearby transit lines for both residents and retail employees would reduce impacts to transportation related energy non- renewable resources.

Conclusion

In summary, as described herein, while construction and operation of the proposed project would require the use of energy resources, including electricity, natural gas, and transportation-related energy, this increase could be accommodated by the existing power suppliers. The demand for all non-renewable energy resources is expected to increase whether or not the proposed project is developed. Any increase in population has the potential to result in the need for more retail and residential facilities, which in turn would use more non-renewable resources, in order to provide the needed services associated with this growth. If not consumed by this project, these non-renewable resources would likely be committed to other projects in the region intended to meet this anticipated growth. As explained above, the project would be subject to the City of Los Angeles Green Building Code Ordinance No. 181480, would be required to meet or exceed requirements of Title 24 efficiency requirements, and would include other energy efficiency features such as landscape and interior water efficiency features and bicycle storage to encourage the use of alternative transportation and improve energy efficiency. Therefore, the project would not use non-renewable resources in a wasteful and inefficient manner. Impacts would be less than significant and no mitigation measures are required. This topic will not be evaluated in the EIR.

[151] Environmental Science Associates (ESA), CalEEMod Utilities calculations, 2015.

Significance: Less than significant.

Cumulative Energy Resources Impacts

The proposed project includes various project components to reduce and minimize to the fullest extent the impact to non-renewable and renewable resources. Construction and operation of the proposed project would require the use of energy resources, including electricity, natural gas, and transportation-related energy; however, as described herein, all impacts on non-renewable resources would be less than significant. Furthermore, the proposed project would not conflict with an energy related conservation plan. The related projects identified in Table A-1 and Figure A-17 would be required to conserve energy in the same manner as the proposed project. The related projects would each undergo CEQA review to ensure that any impacts are appropriately evaluated and if necessary mitigated. Thus, the proposed project and related projects would not contribute to a cumulatively considerable impact on non-renewable energy resources.

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19. Mandatory Findings of Significance

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the project could result in potentially significant impacts with regard to the following subject areas: cultural resources, hazards and hazardous materials, hydrology and water quality, and noise. However, as described above, mitigation measures would be implemented to reduce potentially significant impacts to less than significant for the following subject areas: cultural resources, hazards and hazardous materials, and hydrology and water quality. The topic of noise has the potential to degrade the quality of the environment and, as such, an EIR will be prepared to analyze and document potentially significant impacts. In addition, while the following subject areas are not anticipated to result in potentially significant impacts, they will be discussed further in the EIR to evaluate their potential impacts: aesthetics, land use and planning, and transportation and circulation.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the project are combined with impacts from other development to result in impacts that are greater than the impacts of the project alone. Located within the vicinity of the project site are other current and reasonably foreseeable projects whose development, in conjunction with that of the project on both an individual and cumulative basis may have a potentially significant impact and will be addressed in the EIR for the following subject areas: aesthetics, land use and planning, noise, and transportation and circulation. Therefore, these topics will be evaluated in the EIR.

With regard to cumulative effects for the following issues that would not result in a potentially significant impact: agricultural resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, public services, recreation, utilities, and energy resources, the project would not combine with related projects or other cumulative growth to result in significant cumulative impacts. With respect to agricultural resources and mineral resources, the project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. With respect to biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality, these resources are generally site specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects. Cumulative effects for these topics will not be discussed further in the EIR.

c. Does the project have environmental effects which 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 noise and, thus, this topic will be evaluated in the EIR. In addition, although the following subject areas are not considered potentially significant, they will be further evaluated in the EIR: aesthetics, land use and planning, noise, and transportation and circulation.