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INITIAL STUDY
CENTRAL CITY COMMUNITY PLAN AREA

5th and Hill Project

Case Number: ENV-2016-3766-EIR

Project Location: 319-323 1/2 5th Street and 440-442 S. Hill Street, Los Angeles 90013

Council District: 14 – Jose Huizar

Project Description: The Project Site is currently vacant, but was previously developed along 5th Street with two mixed use buildings. Over a decade ago the buildings were severely damaged in a fire, and subsequently demolished, Additionally, the Site does not contain any trees or landscaping. The Site would be developed with an approximately 55-57 story (maximum 740 feet) building consisting of approximately 261,000 gross square feet on a total lot area of approximately 16,663 square feet. It includes approximately 5 levels of above-grade parking in a 6-story podium (the ground floor will include separate residential and hotel lobbies) and 4 levels of below-grade parking to accommodate approximately 155 - 165 parking spaces. Separate lobby entrances would be provided for the various uses (e.g., residential and hotel) on the ground floor. A pedestrian walkway would be accessible from 5th and provide access to the lobbies. The Project Applicant is requesting two programming options: (A) a condominium and hotel use option and (B) an all condominium use option. Both options would have restaurant and bar facilities. The use options are included to provide flexibility in programming to account for changing market conditions and the evolving Central City Community Plan area in downtown Los Angeles. The Project would include condominium units under both use options.

A. Condominium / Hotel Option: Under Option A, the Site would be developed with a high-rise consisting of the same footprint, floor area, and general features stated above. Condominium units and residential amenities would occupy the top segment of the building (floors 37 through 53), with a lifestyle / boutique type of hotel located below (floors 17 through 35). Amenities such as bars, lounges, meeting rooms, fitness space, and restaurants would occupy floor 7 through 15. Mechanical equipment would be located on floors 16, 36, 54, and 55. Specifically, this use option would include:

- A maximum of 100 condominium units
- Approximately 200 hotel guest rooms
- Approximately 27,500 square feet of commercial restaurant and bar uses
- Separate residential and hotel lobby provided on the ground floor.
- Approximately 4,500 square feet of meeting spaces
- Up to five restaurants and/or bars, two pool decks, and fitness areas

B. All Condominium Option: Under this use option, the Site would be developed with a high-rise consisting of the same footprint, floor area, and general features as stated above. No hotel use is proposed under this option. Condominium units would be located on floors 16 through 29 and floors 31 through 55. Amenities including bars, restaurants, and fitness space would be located on floors 7 through 14. Mechanical equipment would be located on floors 15, 30, 56 and 57. Specifically, this option includes:

- A maximum of 142 condominium units
- Approximately 25,000 square feet of commercial restaurant, bar, and fitness uses.
- Up to four restaurants and bars, two pool decks, and a fitness area

Discretionary Actions:

1. Pursuant to LAMC Section 16.05, Site Plan Review for development of a project resulting in an increase of 50,000 gross square feet of non-residential floor area and a project that results in an increase of 50 or more dwelling units and/or guest rooms;

2. Pursuant to LAMC Section 14.5.6, a Transfer of Floor Area Rights (TFAR) for a transfer of 50,000 square feet or greater;

3. Pursuant to LAMC Section 12.24-W,1 and 12.24-W,18 a Master Conditional Use Permit (MCUB) to allow the sale and consumption of a full line of alcoholic beverages in restaurants and bars, in mini-bars within hotel guest rooms, for room service to hotel and condominium rooms, and at a pool deck; and to allow live entertainment and dancing;

4. Pursuant to LAMC Section 12.27, a Variance to allow increased density for a project located in the Greater Downtown Housing Incentive Area for which the total floor area utilized by guest rooms exceeds the total floor area utilized by dwelling units and to the lot area and density requirement of the C2 zone;

5. Pursuant to LAMC Section 12.27, a Variance to deviate from the locations and access requirements for long-term bicycle parking, which requires specific locations for long-term bicycle parking in parking garages;

6. Pursuant to LAMC Section 12.21-G,3(a)(2), a Director's Determination to allow a ten percent increase in the qualifying area of indoor recreational space as part of the total required open space and pursuant to LAMC Section 12.21-G,3(a)(3), a ten percent reduction in the required area for planting of ground cover, shrubs, and trees in the common open space; and

7. Pursuant to LAMC Section 17.01, Vesting Tentative Tract Map No. 74593 and No. 74659.

APPLICANT:

JMF Enterprises V, LLC
448 S. Hill Street, Suite 608
Los Angeles, CA 90013

PREPARED BY:

CAJA Environmental Services
11990 San Vicente Boulevard
Los Angeles, CA 90049

ON BEHALF OF:

The City of Los Angeles
Department of City Planning
Major Projects Section
200 North Spring Street, Room 750
Los Angeles, CA 90012-2601

March 2017

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1. PROJECT DESCRIPTION

INTRODUCTION

The subject of this Initial Study (IS) is the proposed 5th and Hill Project (the Project). The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the Lead Agency to identify potentially significant environmental effects and determine the environmental subject areas to be analyzed in an Environmental Impact Report (EIR).

Project Information

Project Title: 5th and Hill Project

Project Location: 319-323 1/2 W. 5th St. and 440-442 S. Hill St., Los Angeles, CA 90013

Project Applicant: JMF Enterprises V LLC
448 S. Hill Street, Suite 608, Los Angeles, CA 90013

Lead Agency: City of Los Angeles, Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

PROJECT LOCATION AND SURROUNDING USES

Regional Setting

The Project Site is located in the Central City Community Plan area of the City of Los Angeles. The L-shaped Site is bounded by 5th Street to the south, Hill Street to the west, and commercial buildings to the east and north. See Figure 1, Regional Map, for the location within the context of the City. Figure 2, Aerial Map, provides an aerial photograph of the Site and the immediate surrounding area.

Regional and Local Access

Regional access to the Site is provided by Interstate 110 Freeway (I-110 Harbor Freeway) located approximately 2,600 feet to the northwest, US Route 101 Freeway (US 101 Hollywood Freeway) located approximately 4,000 feet to the northeast, and Interstate 10 (I-10 Santa Monica Freeway) located approximately 1.25 miles to the southwest. Local access is provided by West 5th Street and Hill Street.

Public Transit

The Site is immediately across the street, north of, the Metro Red/Purple Line Pershing Square portal and station. Metro provides bus service with lines 12/302, 4, 6/17/316, 10/48, 18, 28, 53, 55/355, 62, 81, 83, 90/91, 94, 460, Rapid 729, and Rapid 794. LADOT provides bus service with Commuter Express 419.

Surrounding Uses

The L-shaped Site is located in a highly urbanized area of the City. High-rise residential, office, and hotel buildings are located along 5th Street to the south and Hill Street to the west. Commercial, residential, and hotel uses are located along 5th Street and Hill Street in the Project vicinity. Specifically:

North – A 4-story commercial building is directly adjacent to the Site and located at 438 Hill Street. A 10-story hotel is located at 420 Hill Street, and a surface parking lot is located immediately to the north.

South and southwest –A 16-story office and restaurant building is located immediately south of the Site at 448 Hill Street. The Metro Red/Purple Line Pershing Square portal and station is located southwest of the Site, across 5th Street. Pershing Square Public Park (LA Historic-Cultural Monument No. 480) is located at the southwest corner of 5th Street and Hill Street.

West – A 13-story residential building is located at 411 5th Street (US National Register ID 84000891 and LA Historic-Cultural Monument No. 278). A surface parking lot is located immediately adjacent to the residential building.

East – A 9-story commercial and residential building is located directly adjacent to the Site at 315 5th Street (LA Historic-Cultural Monument No. 1019). Additionally, a 4-story commercial building is located at 445 Broadway.

The Site is adjacent to but not a part of, the Broadway Theater and Entertainment Historic District.[1]

EXISTING PROJECT SITE CONDITIONS

Existing Site Characteristics

Three parcels make up the Project Site (assessor parcel numbers (APNs) 5149026007, 5149026009, 5149026011). The parcels are located near the northeast corner of South Hill Street and West 5th Street. The approximately 16,663 square foot (0.38 acre) Site is generally "L" shaped with street frontage on both Hill Street and 5th Street. The two southern most parcels are located at 319- 323 1/2 West 5th Street. The northern parcel is located at 440-442 South Hill Street.

The Project Site's APNs, zoning, land use designation, and lot size is listed on Table 1, Project Site. The Site is designated Regional Center Commercial in the General Plan Framework and the Central City Community Plan. The Site is zoned C2-4D. The C2 portion of the designation indicates that the Site is zoned for a wide range of commercial uses including hotel, office, and restaurant. The zoning also permits residential uses by right. The "4" in the zoning designation indicates the parcel is within Height District No. 4, which restricts development to a 6:1 floor area ratio (FAR), by right with up to a 13:1 FAR

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1 *City of Los Angeles Planning Department, Broadway Theater and Entertainment District Design Guide, 2009. Pg. 4*

with a Transfer of Floor Area Rights (TFAR). The "D" indicates a Development Limitation regarding FAR, except in cases where TFAR is being sought. Additionally, the Site is located in a State Enterprise Zone, Transit Priority Area, and the Greater Downtown Housing Area.[2]

Table 1

Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
440, 442 S. Hill Street	5149-026-009	C2-4D	Regional Center Commercial	4,804.7
321, 323 ½ W. 5th Street	5149-026-011			5,354.2
319 W. 5th Street	5149-026-007			6,463.5
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, February 2017.				

Existing Uses

The Site is currently vacant, but was previously developed along 5th Street with two mixed use buildings. Over a decade ago, the buildings were severely damaged in a fire and subsequently demolished. No landscaping, including trees are located on the Site.

PROJECT CHARACTERISTICS

Project Overview

The Project would develop a currently vacant site with a high-rise mixed-use building featuring a mix of optional hotel use and residential condominiums, with restaurant and bar uses, as well as associated parking and amenities. The Project Applicant is requesting two programming options to provide flexibility due to changing market forces. Each proposed option would fit within the parameters described below, but would differ in their mix of programming.

The Site would be developed with an approximately 55-57 story (maximum 740 feet) building consisting of approximately 261,000 gross square feet on a total lot area of approximately 16,663 square feet of hotel and/or residential uses. Approximately 5 levels of above- parking in a 6-story podium (ground floor will include separate residential and hotel lobbies) and approximately 4 levels of below-grade parking would be provided to accommodate approximately 155 - 165 parking spaces. Separate lobby entrances would be provided for the various uses on the ground floor. A pedestrian walkway would be accessible from 5th and provide access to the lobbies. Condominium units would have access to active shared spaces and uses, as well as terraces that blend indoor and outdoor spaces. Under Option A, private swimming

2 *Zone Information Map Access System (ZIMAS), Zoning Information (ZI) 2374, ZI-2452, and ZI-2385, February 2017.*

pools would be provided for approximately nine individual condominium units on floors 39 through 53. Under Option B, private swimming pools would be provided for approximately 13 individual condominium units on floors 31 through 53. The cantilevering swimming pools would extend out from the tower.

The Project's design includes a cut-out between the top of the parking platform and the Sky Lobby located on the 13th floor. The cut-out would provide sightlines through the building, to make the upper portion of the tower appear as it is lifted above the adjacent buildings.

Use Options

The Project includes two separate use options: (A) a condominium and hotel use option and (B) an all condominium use option. Both options would include amenities such as restaurant, bar, and fitness facilities. The use options would provide flexibility in programming to account for changing market conditions and the evolving Central City Community Plan area. Additional details of each option are shown in Table 2, Project Summary.

A. Condominium / Hotel Option: Under Option A, the Site would be developed with a high-rise consisting of the same footprint, floor area, and general features stated above. Condominium units and residential amenities would occupy the top segment of the building (floors 37 through 53), with a lifestyle / boutique type of hotel located below (floors 17 through 35). Amenities such as bars, lounges, meeting rooms, fitness space, and restaurants would occupy floor 13 through 15 as well as floors 7 through 9 and 12. Mechanical equipment would be located on floors 16, 36, 54, and 55. Specifically, this use option would include:

- A maximum of 100 condominium units
- Approximately 200 hotel guest rooms
- Approximately 27,500 square feet of commercial restaurant and bar uses
- Separate residential and hotel lobby provided on the ground floor.
- Approximately 4,500 square feet of meeting spaces
- Up to five restaurants and/or bars, two pool decks, and fitness areas

B. All Condominium Option: Under this use option, the Site would be developed with a high-rise consisting of the same footprint, floor area, and general features as stated above. No hotel use is proposed under this option. Condominium units would be located on floors 16 through 29 and floors 31 through 55. Amenities including bars, restaurants, and fitness space would be located on floors 7 through 9, and floors 13 and 14. Mechanical equipment would be located on floors 15, 30, 56 and 57. Specifically, this option includes:

- A maximum of 142 condominium units
- Approximately 25,000 square feet of commercial restaurant, bar, and fitness uses.
- Up to four restaurants and bars, two pool decks, and a fitness area

Table 2
Project Summary

Use	Option A	Option B
Residential	100 units	142 units
Hotel	200 rooms	-
Commercial	27,500 sf	25,000 sf

Source: Entitlement Submission, September 30, 2016.
Table: CAJA Environmental: February 2017.

Design and Architectural Materials/Features

The proposed building layout (for both options) is shown in Figure 1-3, Plot Plan.

Inspired by California mid-century architecture and California's climate, the Project connects indoor and outdoor spaces, including a sky lobby on the 13th floor, as well as pool decks, open space and restaurants. A multi-story open space cut out of the center of the building's structure creates a space to enjoy views of downtown and for light to pass through the building's core, while the upper floors would appear to be floating. The tower's living and entertainment spaces reflect the openness of traditional Californian modernist homes. The open floor plans with terraces blend the line between inside and outside spaces. As described above, a number of the condominium units (under both options) would include access to a private cantilevering swimming pool.

The building would be elevated and separated into two distinct parts – a parking podium that would be similar in height to the adjacent buildings, and a tower that "hovers" above a landscaped podium roof. The parking podium would be concealed with planters, stone and specialty glass treatments, and would be subject to the City's Downtown Design Guide, specifically the parking and access guidelines, as well as the project design features included in the City Planning Commission Advisory Notice Relative to Above Grade Parking.[3] The variety of materials used, would break-up the massing of the parking podium's façade. The podium and the landscaped area would create a serene façade, while further up the tower the façade would gradually "disintegrate" into finer grain and more random volumes to create terraces with interspersed cantilevered glass bottom pools.

[3] *City of Los Angeles Advisory Notice Related to Above-Grade Parking, October 27, 2016.*

The open, landscaped podium deck would provide an outdoor space and would be accessible to hotel and residential guests. This elevated outdoor experience may include features such as an entertainment terrace with seating and bar, a garden with a small water feature, a koi pond, distinctive planting arrangements and a pool terrace with a restaurant/bar and views of downtown. The tower above includes additional amenity spaces, including a sky lobby area, an additional restaurant and bars, and a second pool deck.

Floor Area and Density

Pursuant to Section 12.27 of the Los Angeles Municipal Code (LAMC), the Project Applicant is requesting a Variance from the requirements of the lot area/dwelling unit density limitations in the C2 zone set forth in LAMC Section 12.14-C,3 and incorporating the R4 density limitations of Section 12.11-C,4 (1 dwelling unit: 400 square feet lot area). The Project Site falls within the Greater Downtown Housing Incentive Area, which include the provisions of LAMC Section 12.22-C,3(c) to encourage residential development by eliminating the 1 dwelling unit per 400 square feet of lot area limitation. However, the provisions apply only "so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by dwelling units."

Option A includes 200 guest rooms and 100 condominiums. The total floor area of the guest rooms would exceed the total floor area of the dwelling units by 53,402 square feet and thus, Option A would not comply with the Greater Downtown Incentive Area provisions. The Project Applicant is requesting relief from the residential density limitations. As Option B does not include any hotel uses, this variance only applies to Option A.

Pursuant to Sections 14.5.6, and 14.5.8 through 14.5.12 of the Los Angeles Municipal Code, the Project Applicant requests a Transfer of Floor Area Rights from the Los Angeles Convention Center Site at 1201 S. Figueroa Street, a City-owned property, to the Project Site at 319-323 1/2 W. 5th St. and 440-442 S. Hill St. ("Receiver Site") for an amount not to exceed 160,711 square feet, resulting in an increase in the maximum floor area ratio otherwise permitted, from 6:1 to 13:1 ("Transfer").

Height and Floors

Table 3, Heights and Floors, provides the height and floors of each option.

Access

Vehicular access to the Site would be provided from Hill Street and 5th Street. Vehicles would enter the Site via a driveway accessible from Hill Street and would exit the Site via 5th Street. A vehicle drop-off/pick up area would be available to hotel and residential guests/tenants and would be located near the residential/hotel lobbies on the ground floor. Due to the constrained footprint of the Site, the Project would employ innovative parking and circulation solutions, including a valet service that would drive the vehicles into car lifts, which would then move the vehicles to an available parking space.

Table 3
Heights and Floors

Use	Option A	Option B
Tower floors	55	57
Above-grade podium floors	7[1]	7[1]
Tower Height (top of parapet)	721.5 feet	739.5 feet
Podium Height (finish floor)	73 feet	73 feet

[1] Includes the open-air cut-out space above the 6th floor podium. As described above, the parking podium would include 5 levels of parking and one ground floor/lobby level.
Source: Entitlement Submission, September 30, 2016.
Table: CAJA Environmental: February 2017.

Parking

The required amount of vehicle parking for both options is shown in Table 4, Vehicle Parking. As shown and in accordance with LAMC Section 12.21-A,4, the Project is required to provide 148 spaces under Option A and 163 spaces under Option B. The Project would provide 155 spaces under Option A and 163 spaces under Option B. Vehicle parking would be provided via 5 levels of above-grade parking in a 6-story podium (ground level is lobby and circulation) and 4 levels of below-grade parking.

Table 4
Vehicle Parking

Use	Rate	Option A		Option B	
		Quantity	Total	Quantity	Total
Residential – 3 habitable rooms or less	1 space / unit	44 unit	44	26 unit	26
Residential – more than 3 habitable rooms	1.25 space / unit	56 unit	70	116 unit	145
Hotel	-	200 rooms	42	-	-
Restaurant	1 space / 1,000 sf	12,182 sf	12	8,441 sf	8
Outdoor Dining/Terrace	1 space / 1,000 sf	16,000 sf	16	16,500 sf	17
Meeting Room	-	4,500 sf	5	-	-
Total Parking			**189**		**196**
Parking Reduction Per Bicycle Ordinance -15 % Reduction for residential -30% reduction for non-residential			-41		-33
Total Required			**148**		**163**
Total Provided			**155**		**163**

Source: Entitlement Submission, September 30, 2016.
Table: CAJA Environmental: February 2017.

Bicycles

LAMC 12.21-A,16(a)(2) requires new projects to provide bicycle parking spaces. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. Table 5, Bicycle Parking, provides the amount of required and provided bike parking.

Table 5
Bicycle Parking

Use	Rate	Option A		Option B	
		Quantity	Total	Quantity	Total
Residential	Long-term 1 per unit Short-term 1 per 10 unit	100 units	100 10	142 units	142 15
Hotel	Long-term 1 per 20 rooms Short-term 1 per 20 rooms	200 rooms	10 10	-	-
Commercial	Long-term 1 per 2,000 sf Short-term 1 per 2,000 sf	32,000 sf	16 16	25,000 sf	13 13
Total Required	Long-term 1 per 2,000 sf Short-term 1 per 2,000 sf		**126** **36**		**155** **28**
Total Provided	Long-term 1 per 2,000 sf Short-term 1 per 2,000 sf		**128** **36**		**155** **28**

Source: Entitlement Submission, September 30, 2016.
Table: CAJA Environmental: February 2017.

Open Space

In accordance with LAMC Section 12.21-G,2, Table 6, Open Space, provides the amount of required and provided open space.

Amenities and Landscaping

Project amenities total approximately 27,000 square feet and would include two pool decks, event, restaurant and bar spaces, outdoor active and passive recreation spaces, and fitness facilities. Additionally, the Project would provide connections to the existing Pershing Square Building at the 13th floor of the Project's sky lobby and a connection to the top of the Project's six-level podium. In keeping with the indoor/outdoor lifestyle ambiance of the building, the landscape design would feature abundant vegetation. Outdoor seating areas, restaurants and bars, as well as pool areas would include landscaped areas. The Project includes multiple water features, and could include a koi pond and pool deck, and cantilevered private pools accessible from individual condominium units. The cantilevered pools would have glass bottoms and sides and would be visible from the street level. At night the pools may be lit, creating a unique visual effect. Additionally, lighting would be added to enhance the ambiance of both the building and the landscaped areas.

The Project Site contains no trees and the Site has been previously graded.[4] Street trees would be planted along 5th Street and Hill Street, and portions of the ground floor, pool decks, amenity decks, and garden decks would be landscaped as appropriate.[5] Under Option A, a minimum of 25 trees is required (1 tree/4 residential units), as compared to 36 trees under Option B. The Project would include 36 trees.

Table 6
Open Space

Use	Rate	Option A		Option B	
		Quantity	Total (sf)	Quantity	Total (sf)
Required					
Residential – less than 3 habitable rooms	100 square feet per unit	44 units	4,400	26 units	2,600
Residential – 3 habitable rooms	125 square feet per unit	52 units	6,500	88 units	11,000
Residential – 4 or more habitable rooms	175 square feet per unit	4 units	700	28 units	4,900
Total Required			**11,600**		**18,500**
Provided					
Exterior Common Space		N/A	5,860	N/A	9,830
Indoor Common Space (35% max)			4,060 (35%)		6,475 (35%)
Private Open Space (max 50 square feet per unit)			1,800		2,500
Total Provided			**11,720**		**18,805**

Source: Entitlement Submission, September 30, 2016.
Table: CAJA Environmental: February 2017.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2016 California Green Building Standards Code (CalGreen, effective January 1, 2017).[6]

Construction Information

The estimated construction schedule is shown in Table 7, Construction Schedule. The Project is projected to be operational in 2022. The Site is completely vacant and undeveloped. The amount of soils removed or exported would be approximately 25,092 cubic yards (cy).[7]

4 *MJS Design Group, September 30, 2016.*
5 *Entitlement Submission, September 30, 2016.*
6 *Los Angeles Department of Building and Safety: http://ladbs.org/LADBSWeb/green-bldg.jsf, February 2017.*
7 *JMF Enterprises, February 2017.*

Table 7
Construction Schedule

Phase	Duration	Est. Dates
Grading and Excavation	4 months	Fall 2019 to Winter 2020
Construction	24 months	Spring 2020 to Winter 2022
Architectural Coatings	2 months	Spring 2022

Construction schedule, including start, end, and duration dates are estimates only.
Source: JMF Enterprises, February 2017
Table: CAJA Environmental Services, February 2017.

Discretionary Actions

The City of Los Angeles is the Lead Agency for the Project. In order to construct the Project, the Project Applicant is requesting approval of the following actions: [8]

1. Pursuant to LAMC Section 16.05, Site Plan Review for development of a project resulting in an increase of 50,000 gross square feet of non-residential floor area and a project that results in an increase of 50 or more dwelling units and/or guest rooms;

2. Pursuant to LAMC Section 14.5.6, a Transfer of Floor Area Rights (TFAR) for a transfer of 50,000 square feet or greater;

3. Pursuant to LAMC Section 12.24-W,1 and 12.24-W,18 a Master Conditional Use Permit (MCUB) to allow the sale and consumption of a full line of alcoholic beverages in restaurants and bars, in mini-bars within hotel guest rooms, for room service to hotel and condominium rooms, and at a pool deck; and to allow live entertainment and dancing;

4. Pursuant to LAMC Section 12.27, a Variance to allow increased density for a project located in the Greater Downtown Housing Incentive Area for which the total floor area utilized by guest rooms exceeds the total floor area utilized by dwelling units and to the lot area and density requirement of the C2 zone;

5. Pursuant to LAMC Section 12.27, a Variance to deviate from the locations and access requirements for long-term bicycle parking, which requires specific locations for long-term bicycle parking in parking garages;

6. Pursuant to LAMC Section 12.21-G,3(a)(2), a Director's Determination to allow a ten percent increase in the qualifying area of indoor recreational space as part of the total required open space and pursuant to LAMC Section 12.21-G,3(a)(3), a ten percent reduction in the required area for planting of ground cover, shrubs, and trees in the common open space; and

7. Pursuant to LAMC Section 17.01, Vesting Tentative Tract Map No. 74593 and No. 74659.

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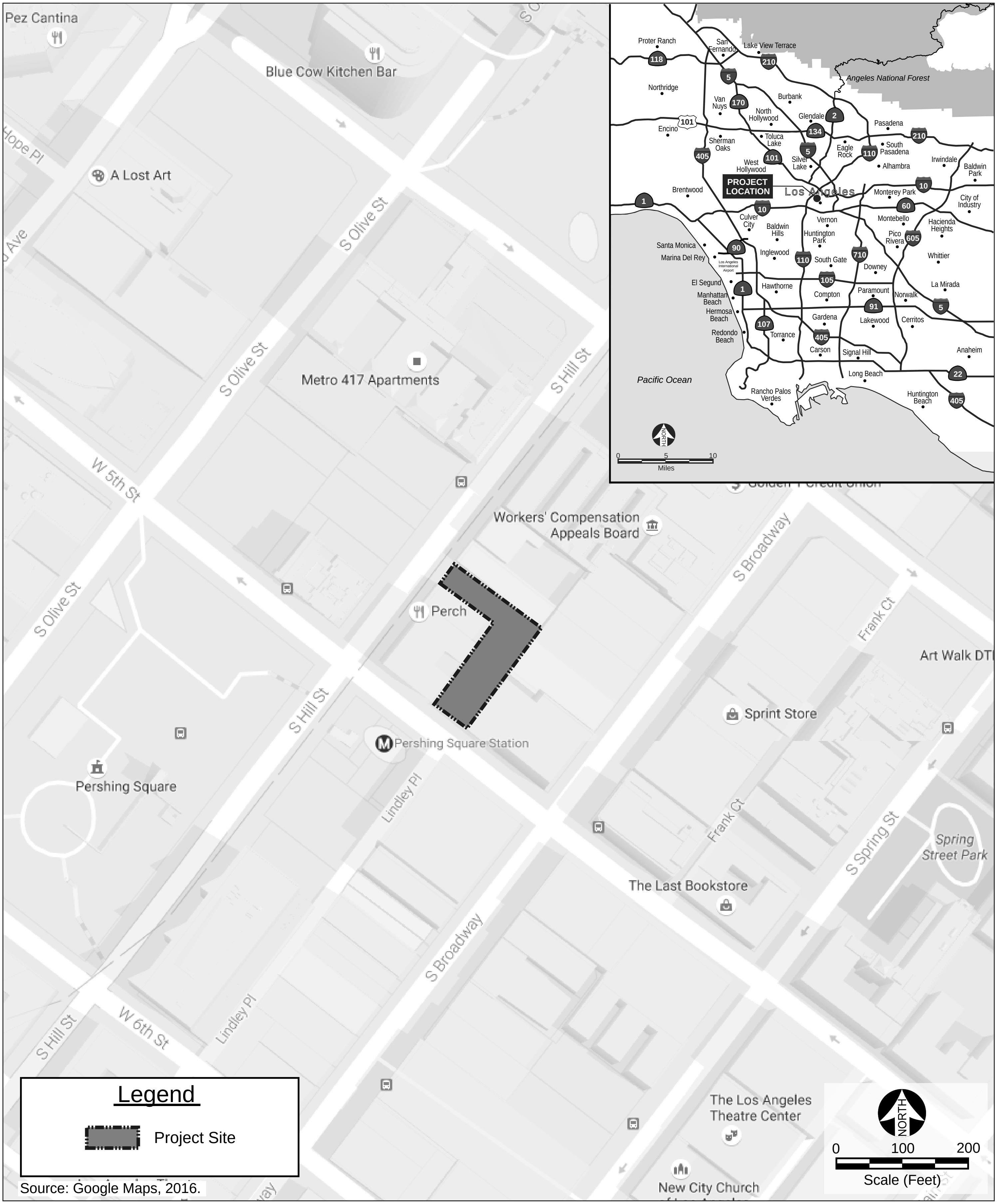
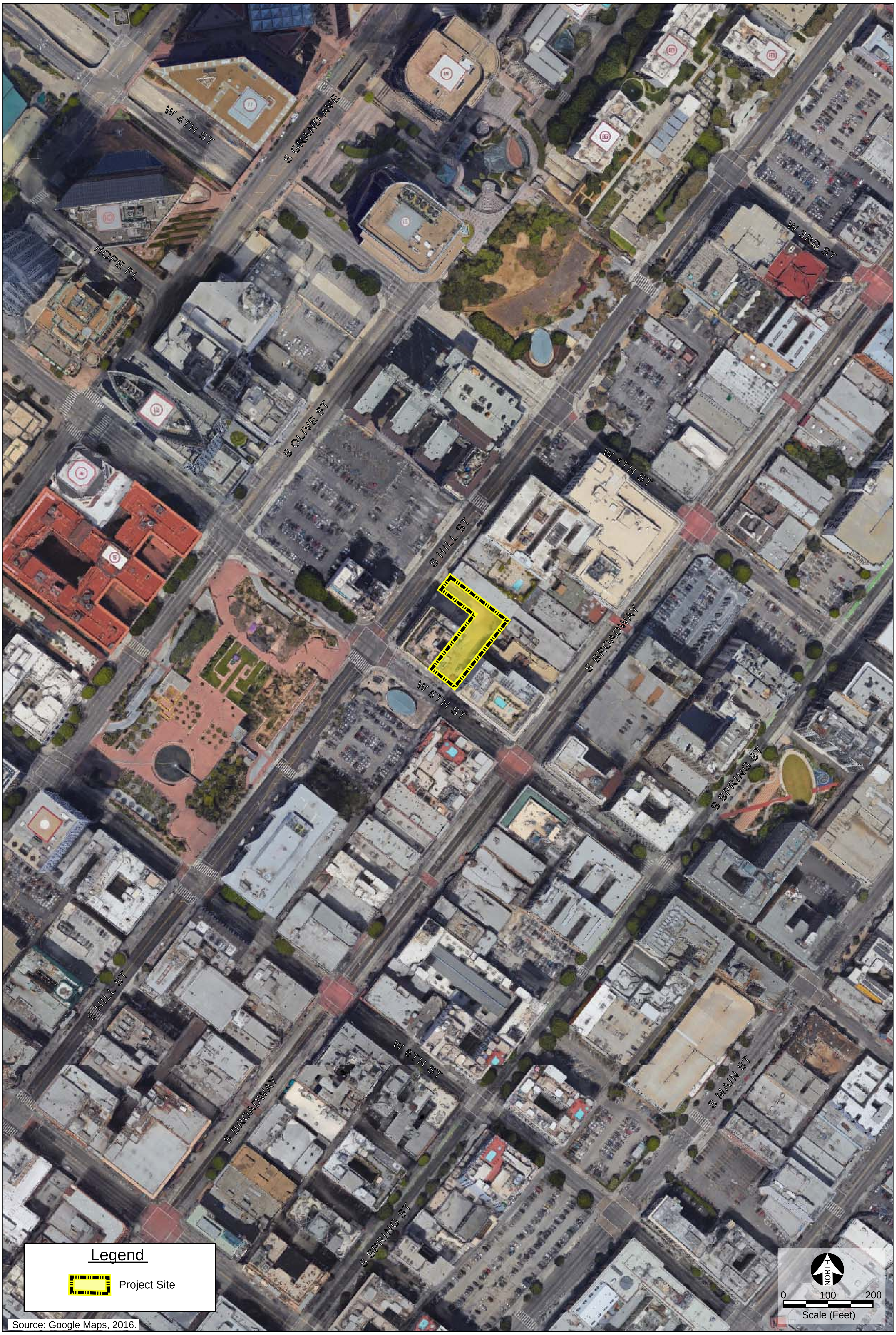
8 *MCA Advisors, Project representation, October 2016.*



CAJA Environmental Services, LLC

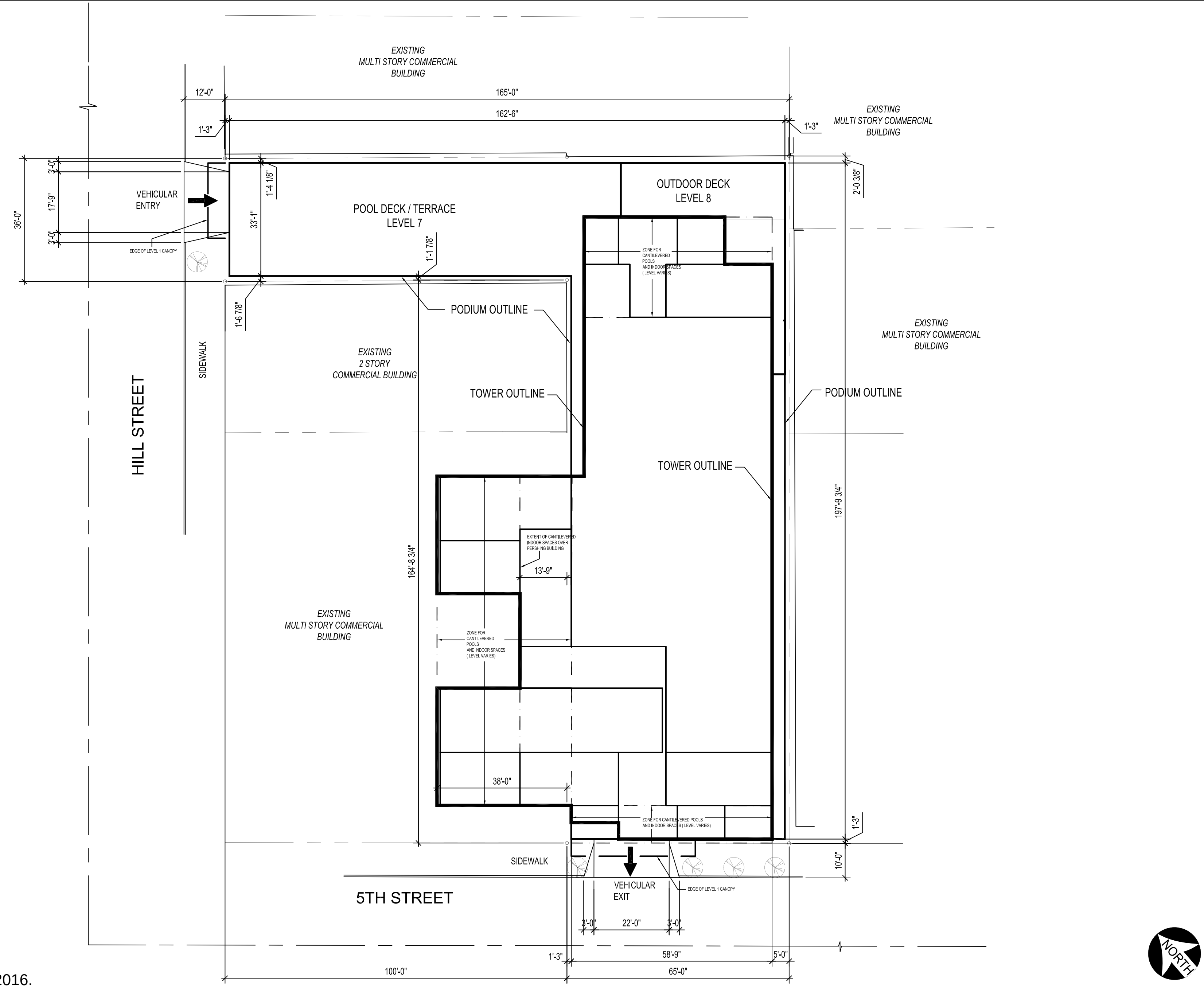
Figure 1
Regional Map



Source: Google Maps, 2016.

CAJA Environmental Services, LLC

Figure 2
Aerial Map



Source: Callison Rtkl, Inc., 2016.

CAJA Environmental Services, LLC

Figure 3
Plot Plan

2. INITIAL STUDY CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles	14-Jose Huizar	March 2017

RESPONSIBLE AGENCIES

N/A

PROJECT TITLE/NO.	CASE NO.
5th and Hill Project	ENV-2016-3766-EIR

PREVIOUS ACTIONS CASE NO.	
N/A	☒ **DOES** have significant changes from previous actions. ❑ **DOES NOT** have significant changes from previous actions.

PROJECT DESCRIPTION:

The Project Applicant is requesting two programming options: (A) a condominium and hotel use option (100 condominium units, 200 hotel rooms, and 27,500 square feet of restaurant and bar facilities) and (B) an all condominium use option (142 condominium units and 25,000 square feet of restaurant and bar facilities).

ENVIRONMENTAL SETTING:

The Project Site is located in the Central City Community Plan area of the City of Los Angeles. The Site is bounded by 5th Street to the south and Hill Street to the west. The Site is currently vacant. (Refer to Project Description, Section 1 above, for additional information).

PROJECT LOCATION

319, 321, 323, 323 ½ 5th Street and 440, 442 S. Hill Street, Los Angeles 90013.

PLANNING DISTRICT		STATUS:
Central City Community Plan Area		❑ **PRELIMINARY** ❑ **PROPOSED** ■ **ADOPTED**
EXISTING ZONING C2-4D	**MAX. DENSITY ZONING** 6:1 FAR 13:1 FAR (with TFAR)	■ **DOES CONFORM TO PLAN**
PLANNED LAND USE & ZONE Regional Center Commercial/C2-4D	**MAX. DENSITY PLAN** N/A	❑ **DOES NOT CONFORM TO PLAN**
SURROUNDING LAND USES Office, residential, commercial	**PROJECT DENSITY** Option A: 100 condominium units + 200 hotel rooms Option B: 142 condominium units	❑ **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.

	Associate Planner
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 a project like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).

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

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

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

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

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

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

BACKGROUND

PROPONENT NAME	PHONE NUMBER
JMF Enterprises V LLC	213-622-2929
PROPONENT ADDRESS	
448 S. Hill Street, Suite 608, Los Angeles, CA 90013	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles	March 2017

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 questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR, with precise impact conclusions reached as part of the analysis within that future document

ENVIRONMENTAL IMPACTS

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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, or other locally recognized desirable aesthetic natural feature within a city-designated 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 day or nighttime views in the area?	❑	❑	■	❑

Senate Bill (SB) 743, effective January 1, 2014, deems the aesthetic impacts of residential infill projects located in defined transit priority project areas as less than significant under CEQA. Zoning Information File (ZI) No. 2452 issued by the City of Los Angeles Department of City Planning, as well as the Department of City Planning, Great Streets Initiative Program Interactive Map[9] shows that the Project Site is located in a Transit Priority Area (TPA).[10] Therefore, all aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and/or shade shadow are deemed less than significant as a matter

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[9] *Los Angeles Department of City Planning, Great Streets Program Interactive Map, Transit Priority Area Layer, https://ladcp.maps.arcgis.com/apps/webappviewer/index.html?id=02d509dfe1ea458da1157b516249f4d9, February 2017.*

[10] *City of Los Angeles, ZI 2452, "Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA," http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf, February 2017.*

of law. Notwithstanding the mandate imposed by SB 743, the following aesthetic analysis of the Project is provided for informational purposes only.

Response a:

Less Than Significant Impact. Panoramic views or scenic vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Scenic vistas are usually associated with vantage points looking out over a section of urban or natural area, which provide a distinct geographical orientation. Examples of scenic vistas include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Central City Community Plan designates the Harbor Freeway (I-110), which runs north/south approximately 0.5 mile to the west of the Project Site, as a scenic freeway, as it offers northbound views of the Downtown skyline and the San Gabriel Mountains in the distance.[11]

The Project Site is located in downtown, an urbanized portion of Los Angeles, and topographically relatively flat. The Project would construct a new building which will be 740 feet in height (up to 55-57 stories), on a vacant site. As such, the Project could be visible from surrounding scenic vistas, including views from I-110. However, the Project will be located on an infill site within a TPA. Accordingly, under SB 743, aesthetics impacts are less than significant.

The Project Site is located in the Central City Community Plan area (CCCP) of the City of Los Angeles. The existing visual character of the surrounding locale is typical of a dense urban area with multi-story buildings, single-story warehouses, and surface parking lots. Views in the vicinity of the Project site are largely constrained by structures on adjacent parcels, and the area's relatively flat topography. Viewsheds refer to the visual qualities of the geographical area that is defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by artificial developments that have become prominent visual components of an area. There are no tall or topographic features on the site from which scenic vistas may be obtained, or which make up part of the scenic landscape of the surrounding community. The Project Site is not located within or along a designated scenic corridor, and no scenic views exist from or through the developed Project Site.

In addition, under CEQA, impacts to private views are not considered a significant impact.[12] Urban features that may contribute to an area's valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or

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[11] *City of Los Angeles, Central City Community Plan, General Plan Land Use Map, July 7, 2009.*

[12] *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.[13]

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Views roughly east-west along 5th Street are limited by existing buildings including the Biltmore, US Bank Tower, and Title Guarantee Building. Views roughly north-south along Hill Street are also constrained by existing buildings including the Metro 417 apartments. Views of the Pershing Square Building and Metropolitan Building would not be impeded by the Project, which would develop vacant land adjacent to the building. These views are available from the public sidewalks and would not be impeded by the Project.

The Project would comply with the goals and design principles of the CCCP, which describes the standards that need to be met for site planning, setbacks, scale, massing, architectural design (materials, windows, glare, and lighting) and other characteristics. The Project would be designed to incorporate the architectural style of a contemporary modern aesthetic, creating a development that does not reduce the integrity and viability of the existing eclectic area which has both historic classic structures and modern high-rises. The Project Site is suitable for the type of residential/commercial development that complements the dense urban character of the area. The Project would be compatible with existing and ongoing redevelopment of commercial, mixed-use, and residential uses within downtown. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Per SB 743 and ZI-2452, aesthetics impacts are less than significant. No further analysis of this topic is required in an EIR.

Response b:

No Impact. The Project Site is vacant and does not contain trees, rock outcroppings, historic structures, and is not located within a state scenic highway. Although a short portion of the I-110 freeway, located 0.5 mile west of the Project Site is designated as a scenic freeway within the CCCP, no impacts to scenic resources within a City-designated scenic highway would occur.

Historic resources in the area include:

> Pershing Square Public Park (LA Historic-Cultural Monument No. 480), located across the intersection of 5th Street and Hill Street.
>
> The 13-story residential building at 411 5th Street (on the US National Register ID 84000891 and LA Historic-Cultural Monument No. 278 at 411 5th Street), located west of the Site.
>
> A 9-story commercial and residential building at 315 5th Street (LA Historic-Cultural Monument No. 1019), located east of the Site.

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[13] *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

The Site is adjacent to but not a part of, the Broadway Theater and Entertainment District.

The Project would not impede views and access to these historic resources. Per SB 743 and ZI-2452, aesthetics impacts are less than significant. No further analysis of this topic in an EIR is required.

Response c:

Less Than Significant Impact. The Project would change the visual character and quality of the Project Site and its surroundings by introducing a new building which will be 740 feet in height. The Project also activates an underutilized parcel, thus increasing pedestrian activity in the area. The Project will be compatible with and complementary to the surrounding area because it would consist of uses (residential and commercial, and possible hotel) that already exist in the area and would blend these uses not block-by-block but within the same parcel.

The surrounding area is urban in nature and features mid and high rise commercial and residential buildings. The Project would be designed in a modern style and the massing would be broken up with cantilevered pools and private balconies. The Project would increase the building heights on the Site from existing uses and would introduce new architectural elements to the area.

The Project would be landscaped according to LAMC Section 12.40 and 12.41, and areas of the ground floor, central courtyard, and the rooftop pool area would be landscaped. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. The Project would comply with LAMC Section 91.6205 which regulates signage on construction barriers and LAMC Section 91.8104, which regulates vandalism, graffiti, and trash.

Thus, compliance with the existing regulations discussed above, and per SB 743 and ZI-2452, aesthetics impacts are less than significant. No further analysis of this topic in an EIR is required.

Response d:

Less Than Significant Impact. The Project Site is located in a well-lit urban portion of downtown where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, and indoor building illumination (light emanating from the interior of structures which passes through windows), all of which are common to densely populated areas. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area.

Shadows

The following analysis is based on:

Appendix A – Preliminary Shading Diagrams, Solargy, Inc., February 2017.

The analysis of the Project's potential shade/shadow impacts focuses on changes in shading conditions for those off-site uses and activities that are dependent on access to natural light. Off-site uses and activities that meet this criteria include routinely used outdoor spaces associated with residential, recreational, or institutional uses (pre-schools, schools, nursing homes); or commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; and existing solar collectors. The City of Los Angeles requires a shade/shadow evaluation for any new building over 60 feet in height.[14]

Shadow sensitive uses in the Project area include:

> 448 Hill Street (directly south of the Site) – rooftop outdoor dining space.
>
> 426 Hill Street (directly north of the Site) – outdoor patio and pool deck.
>
> Angel's Knoll Park (600 feet northwest of the Site near Angels Flight) – Open Space

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 AM and 3 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 AM and 5 PM Pacific Daylight Time (or 8 AM to 4 PM standard time) (between early April and late October).

Shadow figures were created against a flat plane and do not account for existing buildings that create shadows for a worst case scenario.

Winter solstice shadows would be created by the Project and cast to the northwest toward Bunker Hill area in the morning and gradually shift to the northeast toward the Civic Center area in the afternoon. The outdoor restaurant at 448 Hill Street would be shaded from 9 AM to 3 PM. The outdoor patio at 426 Hill Street would be shaded from approximately past 11 AM to 3 PM. However the shadow projections for the proposed building would coincide with the existing 16-story building at 448 Hill Street from approximately 2 PM to 3 PM. The existing building is approximately 1/3 the height of the proposed building and would still cover the outdoor patio. Thus the net increase in coverage is approximately from past 11 AM to approximately 2 PM. Angel's Knolls Park would be shaded from approximately 12 PM to just past 1 PM.

Summer solstice shadows would be created by the Project and cast to the northwest toward Bunker Hill area in the morning and gradually shift to the northeast toward the Civic Center area in the afternoon. The

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[14] *City of Los Angeles, CEQA Thresholds Guide, 2006, Section A (Aesthetics and Visual Resources), Part 4.*

outdoor restaurant at 448 Hill Street would be shaded from 8 AM to 12 PM. The outdoor patio at 426 Hill Street would be shaded from approximately 12 PM to 2 PM. Angel's Knolls Park not be shaded by the Project.

Per SB 743 and ZI-2452, aesthetics shall not be considered a significant impact under CEQA. Therefore, impacts during winter and summer solstice are less than significant. No further analysis of this topic in an EIR is required.

Light and Glare

The Project Site is vacant and currently generates no artificial light and/or glare. The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, such as architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting.

Windows and the amount of interior lighting coming through windows would increase when compared to current conditions. The Project will provide exterior illumination at street level for security and pedestrian activity. All exterior lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient "glow" presently associated with urban settings with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized area that is already illuminated at night, and the Project's lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. As discussed further below, additional project design features are included to reduce light impacts. Per SB 743 and ZI-2452, aesthetics impacts are less than significant.

An adverse impact would occur if the project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the project, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating. As discussed further below, additional project design features are included to reduce light impacts. Thus, with implementation of the PDFs below, and per SB 743 and ZI-2452, aesthetics impacts are less than significant. Further evaluation of this topic is not required in an EIR.

Project Design Features

PDF-Aesthetics-1 Light

Light sources associated with the Project construction shall be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

PDF-Aesthetics-2 Light

Outdoor security and architectural lighting shall be shielded and/or directed toward the areas to be lit to limit spill-over onto adjacent uses where appropriate.

PDF-Aesthetics-3 Glare

Glass used in building facades shall minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agricultural And Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and 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	❑	❑	❑	■

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	❑	❑	❑	■
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined by Public Resources Code section 122220(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?	❑	❑	❑	■

Responses a-e:

No Impact. The Project Site was previously developed and is located in a highly urbanized area. The Site is zoned commercial (C2) and designated as Regional Center Commercial in the Central City Community Plan area. The Site does not contain any agricultural uses, and is not delineated as such on any maps prepared pursuant to the Farmland Mapping and Monitoring Program. No portion of the Project Site is designated as “Prime Farmland,” “Farmland of Statewide Importance,” “Unique Farmland,” or “Farmland of Local Importance.”[15] There are no designated agricultural land uses or Williamson Act contracts in use adjacent to or near the Project Site.[16] The site and the surrounding area do not contain any forest land or land zoned for timberland production. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

[15] *California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014 Map; ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed February 2017.*

[16] *California Department of Conservation, Division of Land Resource Protection, “The Land Conservation (Williamson) Act” (2013), http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx, February 2017.*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	**Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the SCAQMD or Congestion Management 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 air basin is non-attainment (ozone, PM 2.5, & PM 10) under an applicable federal or state ambient air quality standard?	■	❑	❑	❑
d.	Expose sensitive receptors to substantial pollutant concentrations?	■	❑	❑	❑
e.	Create objectionable odors affecting a substantial number of people?	❑	❑	■	❑

Response a:

Potentially Significant Impact. The Project Site is located within the 6,600 square mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [1-hour and 8-hour standards], PM_{10}, and $PM_{2.5}$). As such, the Project would be subject to the SCAQMD's AQMP. The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[17] With regard to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the AQMP, and are

[17] *SCAG is the federally designated metropolitan planning organization (MPO) for Southern California region.*

utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RCPG and AQMP are based, in part, on projections originating with the City's General Plan.

A significant impact may occur if the Project is inconsistent with the growth assumptions upon which the AQMP was based. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, Project development could have an adverse effect on the SCAQMD's implementation of the AQMP. Therefore, this issue will be analyzed further in an EIR.

Response b:

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sources of construction-related pollutants would include construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. Construction and operation of the Project has the potential to result in the violation of air quality standards or contribute to an existing or projected air quality violation. Therefore, further analysis of this topic in an EIR is required to determine the Project's impacts related to construction and operational air pollutant emissions.

Response c:

Potentially Significant Impact. With regard to determining the significance of the Project's contribution to regional emissions, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, an individual project that generates construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. The Project has the potential to add a cumulatively considerable contribution to a federal and/or State non-attainment pollutant. Therefore, this issue will be analyzed further in an EIR.

Response d:

Potentially Significant Impact. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.[18] Sensitive receptors in the Project vicinity include residential areas to the east and Pershing Square Park to the southwest. The Project could expose these sensitive receptors to substantial pollutant concentrations during construction and operation. Therefore, this issue will be analyzed further in an EIR.

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[18] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.*

Response e:

Less Than Significant Impact. The SCAQMD's *CEQA Air Quality Handbook* identifies those land uses that are associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any of the uses identified by the SCAQMD as being associated with odors. While the Project does include restaurant uses, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the project's long-term operations phase to a less-than-significant level.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create a significant level of objectionable odors and would limit potential objectionable odor impacts during the Project's short-term construction phase to a less-than-significant level. Therefore, further evaluation of this issue is not required in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	■
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	❑	❑	❑	■
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	❑	❑	❑	■

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	❑	❑	❑	■
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?	❑	❑	❑	■

Response a:

No Impact. The Project Site is located in an urbanized area of the City. Although the Project Site is currently vacant, the Site was previously developed. The Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value. No hydrological features are present on the Site and there are no sensitive habitats present. Due to the lack of biotic resources, no candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Game (CDFG), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS) would be expected to occur on the Site. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response b:

No Impact. The Project Site is located in an urbanized area of the City and was previously developed. There are no riparian areas located on or adjacent to the Project Site.[19] Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response c:

No Impact. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.[20] No federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed with implementation of the Project. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

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[19] *NavigateLA, Water, Lakes, and Streams layer: http://navigatela.lacity.org/navigatela/, October 19, 2016.*
[20] *U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML, February 2017.*

Response d:

No Impact. The Project Site has been developed but is currently vacant. No vegetation (including trees), waterways, and/or native nursery sites are located on the Site. The Project would not involve changes in the existing environment that could interfere with the movement of migratory birds or other wildlife species. As such, Project implementation would neither interfere with the movement of any native resident, migratory fish, wildlife species, or with established native resident or migratory wildlife corridors. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response e:

No Impact. The Project would be confined to a previously developed Site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources include the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).[21] There are no trees on the Site. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Response f:

No Impact. The Project Site is located in an urbanized area of the City and is currently developed with buildings, paving, and minimal landscaping. The Site is not located in or adjacent to an existing or proposed Significant Ecological Area.[22] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	■	❑	❑	❑
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section	■	❑	❑	❑

21 *City of Los Angeles, Ordinance 177404, approved March 13, 2006 and effective April 23, 2006.*

22 *NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, October 19, 2016.*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	❑	❑	■	❑

Response a:

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

The Project Site is vacant and contains no buildings. Although no historical resources have been identified on-site, the Project Site lies immediately west of the Broadway Theater and Entertainment District Community Design Overlay (CDO) area and the associated Historic Broadway Sign Supplemental Use District (Broadway Sign District), within which a number of historic and potentially historic resources are located. Other historic and potentially historic buildings also exist outside of these districts in the Project vicinity. Given the proximity of several off-site historic or potentially historic buildings, further analysis in an EIR is required to determine the Project's potential impacts with regard to historic resources.

Response b:

Potentially Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources which fall under either of these categories. The excavation of the subterranean parking levels has the potential to affect unknown archaeological resources. Project impacts with respect to archaeological resources are therefore potentially significant and will be analyzed further in an EIR.

Response c:

Potentially Significant Impact. Although the Project Site has been previously developed, excavation of the subterranean parking levels has the potential to affect unknown paleontological resources. Project impacts with respect to paleontological resources will be analyzed further in an EIR.

Response d:

Less Than Significant Impact. The Project Site is located in a heavily urbanized area and has been subject to previous grading and development. While the likelihood of encountering human remains on the Project Site is unlikely, if human remains are discovered during construction, such resources would be treated in accordance with State law, including CEQA Guidelines Section 15064.5, Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. If human remains are encountered, work on the relevant portion of the Project Site would be suspended, and the Los Angeles Department of Public Works (LADPW) as well as the County Coroner would be notified immediately. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no further analysis of this topic in an EIR is required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	**Geology and Soils.** Would the project:				
a.	**Exacerbate existing hazardous environmental conditions by bringing** 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?	❑	❑	■	❑

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse **caused in whole or in part by the Project's exacerbation of the existing environmental conditions.**?	■	❑	❑	❑
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 **caused in whole or in part by the project exacerbating the expansive soil conditions.**?	■	❑	❑	❑
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?	❑	❑	❑	■

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds above are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Response a.i:

Less Than Significant Impact. Fault rupture is defined as the surface displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) classifies fault as active, potentially active, or inactive. Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. Development projects located within an Alquist–Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential.

The Project Site is not located in an Alquist-Priolo Fault Zone or a City-designated Fault Rupture Study Area.[23,24] The Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards, and with seismic safety requirements in the UBC and the LAMC.

There are several principal active faults in the metropolitan region. The greatest of these is the San Andreas Fault, approximately 35 miles (55 kilometers) northwest of downtown Los Angeles, on the other side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Sierra Madre fault zone, which runs through parts of Altadena and other foothills communities, the Raymond Fault in San Marino, and the Hollywood and Santa Monica Faults along the southern edge of the Hollywood Hills and Santa Monica Mountains. Furthermore, the active Puente Hills blind thrust fault is located 1.3 miles from the Site. Although the Los Angeles segment of the active Puente Hills fault lies beneath Downtown Los Angeles, it is located at a depth of approximately 4 miles according to USGS data and has no surface trace; as such, its potential for ground surface rupture is considered remote. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Site, resulting in a less than significant impact. No further analysis of this topic in an EIR is required.

Response a.ii:

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region (UBC Seismic Zone IV). Although the Project Site is not within an Alquist-Priolo Zone, the Site is susceptible to ground shaking during a seismic event. The main seismic hazard affecting the Site is moderate to strong ground shaking. The Project would be designed and constructed in accordance with the City Building Code and California Building Code, which specify structural requirements for different types of buildings in a seismically active area. Additionally, the Project would adhere to the City's Department of Building and Safety recommendations. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region. Based on the above, development of the Project would not exacerbate seismic conditions. Accordingly, impacts with respect to strong seismic ground shaking would be less than significant. No further analysis of this topic in an EIR is required.

Response a.iii:

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

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[23] *City of Los Angeles, ZIMAS Parcel Profile Reports, website: http://zimas.lacity.org, October 19, 2016.*

[24] *City of Los Angeles General Plan Safety Element, Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, November 1996, p.47.*

types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Low groundwater table and the presence of loose to medium dense sand and silty sand are factors that could contribute to the potential for liquefaction. The Project Site is not identified by ZIMAS as being within a liquefaction zone.[25] The City of Los Angeles Seismic Safety Element does not identify the Project Site as being within a liquefiable area.[26] The Project would be required to comply with building regulations set forth by the State Geologist, which require site analysis prior to development. Furthermore, the Project would comply with the CGS *Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* (1997), which provides guidance for evaluation and mitigation of earthquake-related hazards including liquefaction. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including liquefaction. Therefore, a less-than-significant impact would occur and further evaluation of this issue is not required in an EIR.

Response a.iv:

Less Than Significant Impact. Landslides can occur on slopes under normal gravitational forces and during earthquakes when seismic shaking can cause ground failure. Landslides often occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site is characterized by flat topography with minimal sloping terrain. The Project Site is not classified as a landslide hazard zone in the CGS Seismic Hazards Map, nor is it identified by ZIMAS as being within a landslide hazard zone.[27,28] Development of the Project would not substantially alter the existing topography of the Site. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including landslides. Therefore, a less-than-significant impact would occur and further evaluation of this issue is not required in an EIR.

Response b:

Less Than Significant Impact. Implementation of the Project would require grading and excavation activities. These construction activities would disturb existing soils and could expose soils to rainfall and wind, resulting in soil erosion. Conformance with the City's Building Code (Sections 91.7000 through 91.7016), which include construction requirements for grading, excavation, and use of fill, would reduce the potential for wind or waterborne erosion. In addition, the Los Angeles Building Code requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15). Compliance with the existing regulations would ensure construction impacts associated with soil erosion would be less than significant.

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25 *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, October 19, 2016.*

26 *City of Los Angeles, Safety Element of the General Plan, Areas Susceptible to Liquefaction, Exhibit B: http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, February 2017.*

27 *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 2017.*

28 *California Geologic Survey, Seismic Hazard Zones, Hollywood Quadrangle: http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_holly.pdf, February 2017.*

The potential for soil erosion during Project operation would be relatively low due to the urbanized nature of the Project Site and the generally level topography of the Site. In addition, the Project Site will be improved with a new building, hardscape and landscape. Operational impacts would be less than significant. Further evaluation of this issue in an EIR is not required.

Response c:

Potentially Significant Impact. Impacts from landslides, lateral spreading, and liquefaction would be less than significant (Refer to Checklist Question VI (a.iii-aiv) above).

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. As development of the Project may require dewatering for construction of the subterranean parking, potential impacts associated with subsidence could occur. A geotechnical report will be completed for the Project and include an analysis of the probability of subsidence occurring on the Project Site and/or the likelihood of the Project exacerbating the probability of geological hazards occurring on the Site, including subsidence. Therefore, this issue and soil suitability will be analyzed in an EIR.

Response d:

Potentially Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink as water is drawn away. If soils below the development consist of expansive clays within a zone where the water content can fluctuate, foundation movement and/or damage can occur. Although the Project must comply with building regulations set forth by the California Building Code, the potential for an impact still exists. A geotechnical report will be completed for the Project and include an analysis of the existing soils on the Project Site, as well as the likelihood of the Project to exacerbate the probability of increasing risk to people and/or property due impacts related to expansive soil. Therefore, this issue will be analyzed further in an EIR.

Response e:

No Impact. The Project Site is located in a developed area which is served by a wastewater collection, conveyance and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are proposed as part of the Project. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 upon the environment?	■	❑	❑	❑
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	❑	❑	❑

Response a:

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHG), since they have effects that are analogous to the way in which a greenhouse retains heat. The international scientific community has recognized that GHGs are contributing to global climate change. The Project's construction and operation activities have the potential to generate GHGs which may directly or indirectly have a significant impact on the environment. The Project would result in short-term emissions of GHGs during construction. These emissions would generally be associated with the operation of construction equipment and the disposal of construction waste and demolition debris. GHG emissions would also result during operation of the Project from automobiles and commercial service trucks traveling to and from the Site, as well as consumption of electricity, natural gas, and water, use of landscape equipment, and generation of solid waste and wastewater. Therefore, further analysis of this topic in an EIR is required to determine the Project's potential impacts related to GHG emissions.

Response b:

Potentially Significant Impact. GHG statues and executive orders (EO) include Assembly Bill (AB) 32, Senate Bill (SB) 1368, EO S-03-05, EO S-20-06 and EO S-01-07. AB 32, and the California Global Warming Solutions Act of 2006. Most notably AB 32 mandates California's GHG emissions be reduced to 1990 levels by 2020.

In addition, Senate Bill 375 (SB 375), adopted in 2009, requires metropolitan regions to adopt transportation plans and a sustainable communities strategy that reduce vehicle miles travelled. In accordance with SB 375, SCAG prepared and adopted the 2016 Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS) with the primary goal of enhancing sustainability by increasing multi-modal transportation options, and identifying land use strategies that focus new housing and job growth in areas served by public transit. Further, the 2016 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012 RTP/SCS. The Project will be fully evaluated in an EIR for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of GHGs.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII.	**Hazards and Hazardous Materials.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	■	❑	❑	❑
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 **exacerbate the current environmental conditions** so at to 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 **exacerbate current environmental conditions** so as to 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 **exacerbate current environmental conditions** so as to result in a safety hazard for the people residing or working in the 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?	❑	❑	❑	■

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds above are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Response a:

Potentially Significant Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. During operation, residential and office uses would store and use maintenance products, such as cleaning materials. Since the Project would require the transport, use, and disposal of hazardous materials, the potential for an impact exists. Therefore, this issue will be analyzed further in an EIR.

Response b:

Potentially Significant Impact. A significant impact may occur if a project could potentially pose a hazard to the public and environment, including nearby sensitive receptors, by releasing hazardous materials into the environment through accident or upset conditions. While the Project Site is currently vacant, it was previously developed. There is the potential that the previous uses, and/or nearby uses could have contaminated the Site. Therefore, this issue will be analyzed further in an EIR.

Response c:

Potentially Significant Impact. A significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance, and would be used, stored, and disposed of in accordance with manufactures' instructions and in compliance with applicable federal, State, and local regulations. The Project Site is located within 0.25 mile of the following schools:[29]

- Cal-Tot Child Care Center, located at 300 S. Spring Street, 1,250 feet to the east.

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[29] *NavigateLA, Schools Layer: http://navigatela.lacity.org/navigatela/ and Google, February 2017.*

While the construction and operation of the Project would not result in the use and/or release of hazards and/or hazardous materials, due to the proximity of the Cal-Tot Child Care Center, this issue will be analyzed further in an EIR.

Response d:

Potentially Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. Typically, the types of land uses on the Project Site (residential and commercial) are not anticipated to represent a hazard to the public or environment. There are no identified hazards on the Project Site, according to the CA State Water Resources Control Board[30] and CA Department of Toxic Substances Control.[31] However, the potential exists for the Project Site and/or any number of hazardous materials sites near the Project Site, including sites up-gradient, to be listed according to Government Code Section 65962.5 which could create a significant hazard to the public and/or exacerbate the current environmental conditions. Therefore, this issue will be analyzed further in an EIR.

Responses e and f:

No Impact. A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. The Project Site is not located in the vicinity of a public airport or private airstrip. The Los Angeles International Airport (LAX), the closest airport to the Project Site, is located approximately 10 miles to the west. Based on the above, development of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working the Project area. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

Response g:

Potentially Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The construction and operation activities have the potential to impede public access or travel upon public rights-of-way as well as interfere with any adopted emergency response or evacuation plan. Therefore, this issue will be analyzed further in an EIR.

Response h:

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30 *CA State Water Resources Control Board: http://geotracker.waterboards.ca.gov/, February 2017.*
31 *CA Department of Toxic Substances Control: http://www.envirostor.dtsc.ca.gov/public/, February 2017.*

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[32] The Project Site is not located within a designated Fire Buffer Zone or Mountain Fire District in the 1996 City of Los Angeles Safety Element.[33] Based on the above, development of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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 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)?	■	❑	❑	❑
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?	■	❑	❑	❑
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	■	❑	❑	❑
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?	■	❑	❑	❑

[32] *City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, February 2017.*
[33] *City of Los Angeles, Safety Element of the General Plan, Selected Wildfire Hazard Areas, Exhibit D.*

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	❑	❑	❑	■
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	❑	❑	❑	■
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	❑	❑	❑	■
j.	Inundation by seiche, tsunami, or mudflow?	❑	❑	❑	■

Response a:

Potentially Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Project involves the development of residential and commercial uses on land that was previously developed. The Project has the potential to alter the existing surface water runoff drainage pattern and rainfall absorption, causing a net increase of rates of storm water discharge which may exceed water quality standards or waste discharge requirements. Therefore, this potential impact on water quality standards or waste discharge requirements will be further analyzed in an EIR.

Response b:

Potentially Significant Impact. A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project does not propose any permanent groundwater wells or pumping activities. All water supplied to the Site would be derived from the City's existing water supply and infrastructure. However, it is possible that there would be an increase in the amount of impervious surfaces located on the Project Site upon completion of project construction. In addition, the construction would include excavation and could possibly require dewatering at the Site which might have a potentially significant impact on groundwater. The EIR will provide additional analysis to assess this potential impact.

Response c:

Potentially Significant Impact. There are no natural watercourses on the Site. A significant impact may occur if a project would substantially alter drainage patterns resulting in a significant increase in erosion or siltation during construction or operation of a project. As part of the Project, grading and construction activities may temporarily alter the existing drainage patterns of the Site. If not properly designed, the Project could result in erosion and siltation during construction and operation that is potentially significant. Therefore, the EIR will provide analysis to assess this potential.

Response d:

Potentially Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns of the Site and off-site flows, and could result in a potential impact. The EIR will provide additional analysis to assess the potential to result in impacts in drainage patterns.

Response e:

Potentially Significant Impact. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeds the capacity of the storm drain system serving the Project Site, or if the proposed project would introduce substantial new sources of polluted runoff. Construction of the project could contribute to the degradation of existing surface water quality conditions primarily due to: 1) potential erosion and sedimentation during the grading phase; 2) particulate matter from dirt and dust generated on the Site; and 3) construction activities and equipment. The EIR will provide analysis to assess the potential of the Project to result in these hydrology and water quality impacts.

Response f:

Potentially Significant Impact. As previously discussed, the Project could involve the use of contaminants that could potentially degrade water quality if not properly handled and stored. Therefore, the EIR will provide additional analysis to assess this potential impact on hydrology and water quality impacts.

Response g and h:

No Impact. The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods. [34] The Site is not located within a City-designated 100-year or 500-year flood plain.[35] As the Site is located in an area of minimal flooding, the

[34] *NavigateLA, FEMA Flood Hazard layer: http://navigatela.lacity.org/navigatela/, February 10, 2017.*
[35] *City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.*

Project would not introduce people or structures to an area of high flood risk. Therefore, the Project would not contain any significant risks of flooding and would not have the potential to impede or redirect floodwater flows. No impact would occur and no further analysis of this issue is required in an EIR.

Response i:

No Impact. A significant impact may occur if a project were located in an area where flooding, including flooding associated with dam or levee failure, would expose people or structures to a significant risk of loss, injury, or death. The Project Site is not located within an inundation area.[36] No further analysis of this issue is required in an EIR.

Response j:

No Impact. A significant impact may occur if a project is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) or if the Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is not located in a Tsunami Hazard Area, is located at least 10 miles from the Pacific Ocean, and is not near any major water bodies. Therefore, there is no impact associated with seiches or tsunamis at the Site. In addition, the Site is in an urbanized area of the City, and is relatively flat, thereby limiting the potential for inundation by mudflow. No further analysis of this issue is required in an EIR.

		Potentially Significant Impact	Less Than Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	**Land Use And Planning**. Would the project:				
a.	Physically divide an established community?	❑	❑	❑	■
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?	■	❑	❑	❑
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	❑	❑	❑	■

36 *City of Los Angeles, Safety Element of the General Plan, Inundation and Tsunami Hazard Areas, Exhibit G.*

Response a:

No Impact. The Project Site is located in a highly urbanized area of the City and is surrounded by commercial, office, restaurant, and residential uses. The Site is currently vacant but was previously developed along 5th Street with two mixed use buildings. The buildings were severely damaged in a fire, and subsequently demolished over a decade ago. The Site would be developed with an approximately 55-57 story (maximum 740 feet) building consisting of approximately 261,000 gross square feet on a total lot area of approximately 16,663 square feet. It includes approximately 5 levels of above-grade and approximately 4 levels of below-grade parking to accommodate approximately 155 - 165 parking spaces. The Project Applicant is requesting two programming options: (A) a condominium and hotel use option and (B) an all condominium use option. Both options would have restaurant and bar facilities.

The proposed uses are consistent with the types of land uses already present or proposed in the surrounding area. As development of the Project would occur entirely within the Project Site boundaries, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts related to the physical division of an established community would be less than significant. No further analysis of this topic in the EIR is required.

Response b:

Potentially Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Project would require several discretionary actions to be approved by the City. Analysis to assess the potential impact from the Project's consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the CCP) or regional plans and policies (such as the SCAQMD and Metro CMP) will be included in the EIR. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC and other applicable land use plans, policies, and regulations.

Response c:

No Impact. A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site has previously developed and is located in an urbanized area. As discussed under Checklist Question IV(f), there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that apply to the Site. Implementation of the Project would not conflict with any habitat conservation plans. Therefore, no impact would occur. Further evaluation of this issue in an EIR is not required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	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?	❑	❑	❑	■

Response a:

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a City-designated oil field or oil drilling area,[37] or a City-designated Mineral Resource Zone 2 Area (MRZ-2).[38] Based on the Project Site's commercial land use and zoning designations, the City has determined there are no plans to utilize the site for long-term mineral extraction. Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource and further evaluation is not required in an EIR.

Response b:

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address "minerals and other natural resources." According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area around the Project Site has been developed with structures and is inaccessible for mining extraction.[39] Furthermore, the Project

[37] *NavigateLA, Geotechnical – Oil Wells, Oil Fields layer: http://navigatela.lacity.org/index01.cfm, October 19, 2016.*

[38] *City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.*

[39] *Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.*

Site is developed and located in an urbanized area of the City. Development of the Project would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Noise. Would the project:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	❑	❑	❑
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	■	❑	❑	❑
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	■	❑	❑	❑
d. 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 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?	❑	❑	❑	■
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?	❑	❑	❑	■

Response a:

Potentially Significant Impact. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element). Construction of the Project would require the use of construction equipment during grading, excavation, and hauling activities which would generate noise on a short-term basis.

Additionally, the Project's operational uses (e.g., commercial, residential, hotel) would generate on-site noise from the operation of mechanical equipment, the loading area, and use of the open space and amenity areas. In addition, the traffic attributable to the Project has the potential to cause noise levels which could exceed City Noise Ordinance standards. Therefore, the potential impact from these noise increases will be analyzed further in an EIR.

Response b:

Potentially Significant Impact. A significant impact would occur if the Project were to generate or expose people to excessive groundborne vibration or groundborne noise levels. Construction of the Project would require the use of heavy construction equipment during grading, excavation, hauling, installation of building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise which could have a potentially significant impact. As such, the Project has the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, this issue will be analyzed further in an EIR.

Response c:

Potentially Significant Impact. Refer to Checklist Question XII (a).

A significant impact may occur if the operation would introduce substantial new sources of noise or would substantially add to existing sources of noise within the vicinity of the Site. Construction and operational activities associated with the Project have the potential to increase ambient noise levels above existing levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response d:

Potentially Significant Impact. A significant impact may occur if a project were to introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project or on a periodic basis during the operation of the proposed project. As discussed above, construction activities have the potential to temporarily or periodically increase ambient noise levels above existing levels. In addition, the increase in on-site uses may also result in periodic increases in noise levels which could have a potentially significant impact. Therefore, this issue will be analyzed further in an EIR.

Response e:

No Impact. A significant impact may occur if a project is located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site during construction of the proposed project. As discussed under Checklist Question VIII(e) above, the Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. The Project would therefore not expose people residing or working in the project area to excessive noise levels from an airport use. No impact would occur and further evaluation of this issue is not required.

Response f:

No Impact. As discussed under Checklist Question VIII(f), there are no private airstrips in the vicinity of the Site. Thus, the Project would not expose people residing or working in the Project area to excessive noise levels. No impact would occur and further evaluation of this issue is required in an EIR.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 necessitating the construction of replacement housing elsewhere?	❑	❑	❑	■
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	❑	❑	❑	■

Response a:

Potentially Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Project involves the construction of an approximately 55-57 story (maximum 740 feet) building consisting of approximately 261,000 gross square feet on a total lot area of approximately 16,663 square feet. It includes approximately 5 levels of above-grade and approximately 4 levels of below-grade parking to accommodate approximately 155 - 165 parking spaces. The Project Applicant is requesting two programming options: (A) a condominium and hotel use option and (B) an all condominium use option. Both options would have restaurant and bar facilities.

The Project would result in the generation of jobs (both for construction and operation) and would also result in an increased residential population which could induce potentially significant population growth. The Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG). SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. In April 2016, SCAG adopted the 2016 RTP/SCS. The 2016 RTP/SCS is an update to the 2012 RTP/SCS and reflects changes in economic, policy, and demographic conditions.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure since the Project would utilize the existing facilities. However, as the Project would introduce new residential units and employment opportunities, the Project's growth contributions will be reviewed in the EIR for consistency with SCAG population and employment projections, as well as consistency with regional and local growth policies, including the City's General Plan and CCCP. Therefore, this issue will be analyzed further in an EIR.

Response b:

No Impact. A significant impact may occur if a project would result in displacement of a substantial number of existing housing units, necessitating construction of replacement housing elsewhere. The Project would not displace any housing since there is no housing on the Site. Further, both program options include a residential component. Therefore, no impact would occur and further evaluation in an EIR is not required.

Response c:

No Impact. As the Project Site is vacant and no housing exists on the Site, a significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. the Project would not displace any people or require the construction of replacement housing elsewhere. Therefore, no impact would occur and further evaluation in an EIR is not required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV.	**Public Services.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a.	Fire protection?	■	❑	❑	❑
b.	Police protection?	■	❑	❑	❑
c.	Schools?	■	❑	❑	❑
d.	Parks?	■	❑	❑	❑
e.	Other governmental services (including roads)?	■	❑	❑	❑

Response a:

Potential Significant Impact. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve the Project based upon response time, access, or fire hydrant/water availability, necessitating the construction of a new or physically altered facility. As discussed above, under Checklist Section XIII, Population and Housing, development of the Project would increase the residential and daytime population through the construction of the mixed use building. Fire and emergency services will be provided by the City of Los Angeles Fire Department (LAFD). Specifically the Project Site will be served by:

1. Fire Station No. 3, located at 108 N. Fremont Avenue, approximately 4,500 feet from the Site.

2. Fire Station No. 9, located at 430 E. 7th Street, approximately 4,000 feet from the Site.

The Project would increase the intensity of development at the Project Site, which has the potential for increased demand for fire protection services. This potential impact of the Project on fire protection services will be analyzed in the EIR.

Response b:

Potentially Significant Impact. As discussed above, under the Project, the residential and daytime population would increase on the Project Site, as compared to existing conditions. The City of Los Angeles Police Department (LAPD) will provide police services to the Project Site. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project, necessitating a new or physically altered station. If existing service capacities are exceeded, new facilities, equipment and/or personnel may be required to maintain acceptable response times and service levels. The Site is located in Reporting District 143 of the Central Division Police Station, located at 251 E. 6th Street, approximately 2,600 feet from the Project Site.[40] Further analysis of this topic in the EIR is required to determine the Project's potential impacts on police protection services.

Response c:

Potentially Significant Impact. The residential population generated by the Project may generate an increase in demand for school facilities. The Los Angeles Unified School District (LAUSD) operates and maintains public school facilities located in the City. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Specifically, the Project is served by the following LAUSD schools:[41]

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[40] *LAPD: http://www.lapdonline.org/central_community_police_station, February 2017.*
[41] *http://rsi.lausd.net/ResidentSchoolIdentifier/*

9th Street Elementary (K-5), located at 835 Stanford Avenue, had 334 students enrolled in 2015-16 School Year.[42]

John H. Liechty Middle (6-8), located at 650 South Union Avenue, had 1,077 students enrolled in 2015-16 School Year.[43]

Belmont School Choice Area (9-12):

Miguel Contreras Learning Complex, located at 322 Lucas Avenue

1. Academic Leadership Community had 432 students enrolled in 2015-16 School Year.[44]
2. School of Business and Tourism had 447 students enrolled in 2015-16 School Year.[45]
3. School of Social Justice had 485 students enrolled in 2015-16 School Year.[46]
4. LA School of Global Studies had 365 students enrolled in 2015-16 School Year.[47]

Ramon C. Cortines School of Visual and Performing Arts, located at 450 North Grand Avenue, had 1,461 students enrolled in 2015-16 School Year.[48]

Belmont High, located at 1575 2nd Street, had 991 students enrolled in 2015-16 School Year.[49]

Edward R. Roybal High, located at 1200 West Colton Street, had 1,095 students enrolled in 2015-16 School Year.[50]

Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on school services and facilities provided by LAUSD.

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[42] *Los Angeles Unified School District, http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=5505, February 2017.*

[43] *Los Angeles Unified School District, http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8058, February 2017.*

[44] *Los Angeles Unified School District, http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8207, February 2017.*

[45] *Los Angeles Unified School District, http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8517, February 2017.*

[46] *Los Angeles Unified School District, http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8527.*

[47] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8774.*

[48] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8516.*

[49] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8543.*

[50] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8544.*

Response d:

Potentially Significant Impact. A significant impact would occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities and the construction of which could cause significant environmental impacts. The Project includes the development of residential uses that would increase the permanent residential population of the area. Residential developments typically have the greatest potential to result in impacts to parks since they generate a permanent increase in residential population. Therefore, there could be a potentially significant impact from new parks or recreation facilities. The EIR will evaluate the Project's impacts on park facilities.

Response e:

Potentially Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could exceed the capacity of public facilities (such as libraries), necessitating a new or physically altered library, the construction of which would have significant physical impacts on the environment. The Project is served by the following Los Angeles Public Library (LAPL) branches:[51]

Central Library, located at 640 W. 5th Street

Little Tokyo, located at 203 S. Los Angeles Street

Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. Therefore, the EIR will evaluate the Project's potential impacts upon library facilities.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV.	**Recreation.**				
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	■	❑	❑	❑
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	■	❑	❑	❑

[51] *http://www.lapl.org/branches*

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
environment?				

Response a:

Potentially Significant Impact. A significant impact may occur if the Project would include substantial employment or population growth that could generate an increased demand for public park facilities which exceeds the capacities of existing parks and/or cause premature deterioration of the park facilities. The Project involves the construction of new residential uses that could increase the demand for neighborhood and regional parks and recreational facilities in the area (see XIV(d)). While on-site open space and recreational amenities would be included, the Project has the potential to increase demands upon several public park facilities located within the Project area. The EIR will evaluate the potential of the Project to cause an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur.

Response b:

Potentially Significant Impact. As discussed above, the Project has the potential to increase demands upon recreational facilities that may in turn require the construction of new facilities or the expansion of existing facilities. The construction of these facilities may have an adverse physical effect on the environment. Therefore, the potential of such facilities to have an adverse effect on the environment will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Transportation/Circulation. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	■	❑	❑	❑

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Exceed, either individually or cumulatively, a level of service standard 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 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?	■	❑	❑	❑

Response a:

Potentially Significant Impact. Operation of the Project has the potential to result in an increase in daily and peak hour traffic within the Project vicinity. In addition, Project construction activities have the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

A significant impact would occur if the project generated traffic at each study intersection would exceed City of Los Angeles Department of Transportation (LADOT) standards. It is unknown at this time whether the Project may result in potentially significant traffic impacts during operation and construction. The potential impacts of the Project will be evaluated in the EIR and a traffic study in accordance with the assumptions, methodology, and procedures approved by LADOT will be completed for the Project.

Response b:

Potentially Significant Impact. A significant impact may occur if the adopted County of Los Angeles Metropolitan Transit Authority (Metro) Congestion management Program (CMP) thresholds are exceeded. The CMP was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network which includes all state highways and some arterials within the County of Los Angeles. If the level of service standard deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan that is in conformance with the Los Angeles County CMP. The intent of the CMP is to provide information to decision makers to assist in the allocation of transportation funds through the State Transportation Improvement Program (STIP) process. A CMP traffic impact analysis is required if a project would add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersections where a project would add 50 or more peak hour trips. The local CMP requires that all CMP monitoring intersections be analyzed where a project would likely add 50 or more trips during the peak hours. It is unknown at this time whether the Project may result in a potentially significant traffic impact at any CMP monitoring locations. However, there could be an impact if levels of service standards are exceeded. Therefore, this issue will be analyzed further in an EIR.

Response c:

No Impact. A significant impact would occur if a proposed project included an aviation-related use and would result in safety risks associated with such use. The Project does not include any aviation-related uses and as discussed under Checklist Question VIII(e), the Project Site is not located within an airport land use plan area or within two miles of a public airport or private use airport. Further, as the Project would extend more than 200 feet above the existing grade, in accordance with Code of Federal Regulations Title 14, Section 77.13, the Applicant would be required to submit copies of Federal Aviation Administration (FAA) Form 7460-1 to the FAA Obstruction Evaluation Service (OES). The OES would then evaluate the Project, and any OES recommendations would be incorporated into the building's design, including protocols pertaining to building markings and lighting.

Implementation of required design features and lighting would ensure that impacts associated with air traffic safety would be less than significant. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

Response d:

Potentially Significant Impact. A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. It is unknown at this time whether the Project may increase hazards due to a design feature. In addition, there could be a potentially significant impact if the driveway width and queuing length result in inadequate space to accommodate the vehicles that would access the Site during operation. Therefore, this issue will be analyzed further in an EIR.

Response e:

Potentially Significant Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the LAFD or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses. The increased traffic during construction and operation could obstruct emergency vehicle access to the Project Site and adjacent uses in the Project vicinity. Therefore, the EIR will provide additional analysis to assess the potential to result in impacts on emergency access.

Response f:

Potentially Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification to existing alternative transportation facilities located on- or off-site. There are multiple bus stops and the Metro Red/Purple Line Pershing Square portal and station nearby, which could be impacted by the Project. The potential of the Project to decrease the performance of these facilities or conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in an EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Tribal Cultural Resources. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	■	❑	❑	❑
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	■	❑	❑	❑

Response a:

As discussed above under Checklist Question V(a), the Site is vacant but nearby historic resources and the Broadway Historic District. Therefore, this issue will be analyzed further in an EIR.

Response b:

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public

Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation of the project, and the lead agency must being the consultation process within 30 days of receiving the request for consultation.

The NAHC provides a list of Native American groups and individuals who could have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. Notices have been mailed to Native American tribes known to be culturally affiliated with the Project area. Until the City has received and evaluated responses from the Tribes, a determination of significance cannot be made. Therefore, this topic will be evaluated in an EIR.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII.	**Utilities.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	❑	❑	■	❑
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	■	❑	❑	❑
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?	■	❑	❑	❑
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 which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	■	❑	❑	❑
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?	❑	❑	■	❑

Response a:

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. Wastewater discharges are conveyed to the Hyperion Treatment Plant (HTP), which is a public facility and is therefore subject to the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The Project's introduction of new residential uses and commercial uses would comply with federal, State, and local statutes and regulations related to wastewater discharge. Therefore, a less-than-significant impact would occur and no mitigation measures would be required. Further evaluation of this issue in an EIR is not required.

Response b:

Potentially Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that new facilities would be needed, the construction of which would cause significant environmental effects. The Project is expected to increase water usage and wastewater generated as compared to the existing uses on the Project Site. The potentially significant impact with respect to the capacity of the water and wastewater treatment plants and the existing water and sewer lines that serve the Site will be analyzed in the EIR.

Response c:

Potentially Significant Impact. A significant impact may occur if the volume of stormwater runoff were to increase to a level exceeding the capacity of the storm drain system serving the Project Site, to the extent that existing facilities would need to be expanded and the construction of which would cause significant environmental effects. The addition of new uses to the Project Site may require new or expanded stormwater facilities which could have a potentially significant impact. The potential of the Project to result in the construction of these new or expanded stormwater facilities will be analyzed in the EIR.

Response d:

Potentially Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The Project is estimated to consume an increase in water as compared to the existing conditions (which are vacant and not consuming water), resulting in a potentially significant impact if new or expanded entitlements are needed. Water supply to the Project Site is provided by the LADWP. Buildout of the Project would create an increase in demand for water supplies compared to existing conditions on the Project Site. While the Project would incorporate various water-efficient design features pursuant to LAMC Section 122.03(a) and comply with Ordinance No. 170,978 (Water Management Ordinance) which imposes numerous water conservation measures for landscaped areas, further evaluation in an EIR is necessary to determine the impact on water supplies. Thus, potential impacts with respect to water supply will be analyzed in an EIR.

Response e:

Potentially Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed under Checklist Question XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, the Project's potential impact to wastewater treatment facilities and infrastructure will be analyzed in an EIR.

Response f:

Potentially Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste generated in the City is disposed of at various landfill facilities located throughout Los Angeles County. Compared to existing conditions, the Project would generate additional solid waste from demolition debris, site preparation, and construction activities, as well as during operation of the Project. As the Project would increase the residential, employee and visitor population in the Project area, impacts to the surrounding landfills could be significant. Therefore, impacts to local landfills will be analyzed in an EIR.

Response g:

Less Than Significant Impact. Solid waste management is guided by the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. The Act requires that localities conduct a Solid Waste Generation Study (SWGS) and develop a Source Reduction Recycling Element (SRRE). The City of Los Angeles prepared a Solid Waste Management Policy Plan that was adopted by the City Council in 1994. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations and policies related to solid waste, including (but not limited to) AB 939, CiSWMPP, SRRE, Ordinance No. 171687 and the Framework Element of the General Plan. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171687. The Project would comply with federal, State, and local statutes and regulations related to solid waste. Therefore, a less-than-significant impact would occur. Further evaluation of this issue in an EIR is not required.

Appendix F, Energy Conservation, of the CEQA Guidelines will also be addressed in the EIR.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. 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?	■	❑	❑	❑
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	■	❑	❑	❑
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	■	❑	❑	❑

Response a:

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with regard to the following issues: Air Quality; Cultural Resources (Historic, Archaeologic, Paleontological, and human remains); Geology and Soils, Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population; Public Services (Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; Tribal Cultural Resources, and Utilities (Water Supply, Wastewater, Solid Waste, and Energy Conservation). Therefore, the Project has the potential to degrade the quality of the environment. An EIR will be prepared to analyze and document these potentially significant impacts. All feasible mitigation measures will be identified to reduce the identified significant impacts. As discussed above in the Responses to Checklist Questions IV.a through f, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

Response b:

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to Air Quality; Cultural Resources (Historic, Archaeologic, Paleontological, and human remains); Geology and Soils, Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population; Public Services (Fire Protection, Police Protection, Schools, Parks and Recreation, and Libraries); Transportation/Circulation; Tribal Cultural Resources, and Utilities (Water Supply, Wastewater, Solid Waste, and Energy Conservation) resulting from the project in conjunction with the applicable related projects will be analyzed and documented in an EIR. The potential for significant cumulative impacts from the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. Cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts

Response c:

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in environmental effects that could have substantial adverse effects on human beings, either directly or indirectly. As a result, these potential effects will be analyzed further in an EIR.

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

As noted above, the lead agency has determined that the proposed project may result in a significant effect on the environment, and an environmental impact report is required.

PREPARED BY	TITLE	TELEPHONE	DATE
Seth Wulkan	**Project Manager**	**310 469 6704**	**March 2017**