



City of Los Angeles

Department of City Planning • Environmental Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



Initial Study

This document comprises the Initial Study as required under the California Environmental Quality Act
Hollywood Community Plan Area

6901 Santa Monica Boulevard Mixed-Use Project

Case Number: ENV-2015-4612-EIR

Project Location: 1100, 1106, 1110, 1114, 1118, 1122, 1126 Orange Drive; 6909, 6911, 6917, 6921, 6931 Santa Monica Boulevard; and 1107, 1111, 1115, 1119, 1121 Mansfield Avenue, Los Angeles, CA 90038

Council District: 4, Councilmember David Ryu

Project Description: The Project proposes the development of an approximately 218,316-square-foot mixed-use building on a 72,772 square-foot site composed of 12 contiguous parcels of land within the Hollywood Community Plan Area. The Project would include 231 multi-family residential units, including 15 units for Very Low Income households, within 7 stories, above 15,000 square feet of ground-floor neighborhood-serving commercial uses (up to 5,000 square feet of high-turn-over restaurant and up to 10,000 square feet of general retail) and 2 levels of subterranean parking, providing 390 vehicle parking spaces. The Project would vary in height from 23 feet to 80.4 feet and have an FAR of 3.0:1. Development of the Project Site would include the demolition and removal of the two existing single-story office buildings and two automobile storage structures ranging from one-to-two stories in height, totaling 54,661 square feet. The Applicant is requesting approval of a General Plan Amendment from Medium Density Residential and Highway Oriented Commercial land uses to Neighborhood Commercial land use for the entire Project Site; a Vesting Zone and Height District Change from C2-1D and R3-1XL to C2-2D with a D Limitation to restrict FAR to 3.0:1 in lieu of 6.0:1 for the entire Project Site; a Zoning Administrator's Adjustment to permit a zero-foot side yard along Santa Monica Boulevard in lieu of the 10-foot otherwise required; a Master Conditional Use to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption within up to three tenant spaces; and Site Plan Review for a project that results in more than 50 dwelling units. The Project will also utilize a Density Bonus by-right to permit a 27.5 percent increase in density, equal to 50 additional units, with 8 percent, equal to 15 units, set aside for Very Low Income households. The Project is not requesting any on or off-menu incentives.

APPLICANT:

Onni Santa Monica, LP
315 W. 9th Street, Suite 801
Los Angeles, CA 90015

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
Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, CA 90012-260

February 2016

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1. PROJECT DESCRIPTION

The subject of this Initial Study is the development of an approximately 218,316-square-foot mixed-use building on a 72,772 square-foot site composed of 12 contiguous parcels of land. The Project would include 231 multi-family residential units, including 15 units for Very Low Income households, within 7 stories, above 15,000 square feet of ground-floor neighborhood-serving commercial uses (up to 5,000 square feet of high-turn-over restaurant and up to 10,000 square feet of general retail) and 2 levels of subterranean parking, providing 390 vehicle parking spaces. The Project would vary in height from 23 feet to 80.4 feet and have an FAR of 3.0:1. Development of the Project Site would include the demolition and removal of the two existing single-story office buildings and two automobile storage structures ranging from one-to-two stories in height, totaling 54,661 square feet. The Applicant is requesting approval of a General Plan Amendment from Medium Density Residential and Highway Oriented Commercial land uses to Neighborhood Commercial land use for the entire Project Site; a Vesting Zone and Height District Change from C2-1D and R3-1XL to C2-2D with a D Limitation to restrict FAR to 3.0:1 in lieu of 6.0:1 for the entire Project Site; a Zoning Administrator's Adjustment to permit a zero-foot side yard along Santa Monica Boulevard in lieu of the 10-foot otherwise required; a Master Conditional Use to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption within up to three tenant spaces; and Site Plan Review for a project that results in more than 50 dwelling units. The Project will also utilize a Density Bonus by-right to permit a 27.5 percent increase in density, equal to 50 additional units, with 8 percent, equal to 15 units, set aside for Very Low Income households. The Project is not requesting any on or off-menu incentives.

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 determine whether an Environmental Impact Report (EIR) or a Mitigated Negative Declaration must be prepared or to identify the significant environmental effects to be analyzed in an EIR.

Project Information

Project Title: 6901 Santa Monica Boulevard Mixed-Use Project

Project Location: 1100, 1106, 1110, 1114, 1118, 1122, 1126 Orange Drive; 6909, 6911, 6917, 6921, 6931 Santa Monica Boulevard; and 1107, 1111, 1115, 1119, 1121 Mansfield Avenue, Los Angeles, CA 90038

Project Applicant: Onni Santa Monica, LP
315 W. 9th Street, Suite 801, Los Angeles, CA 90015

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

Regulatory Framework

According to CEQA Guidelines, Article 5. Preliminary Review of Projects and Conduct of Initial Study:

15063. INITIAL STUDY

(a) Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment. If the Lead Agency can determine that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable.

(1) All phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

(2) To meet the requirements of this section, the lead agency may use an environmental assessment or a similar analysis prepared pursuant to the National Environmental Policy Act.

(3) An initial study may rely upon expert opinion supported by facts, technical studies or other substantial evidence to document its findings. However, an initial study is neither intended nor required to include the level of detail included in an EIR.

(b) Results.

(1) If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the Lead Agency shall do one of the following:

(A) Prepare an EIR, or

(B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or

(C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration. Another appropriate process may include, for example, a master EIR, a master environmental assessment, approval of housing and neighborhood commercial facilities in urban areas, approval of residential projects pursuant to a specific plans described in section 15182, approval of residential projects consistent with a community plan, general plan or zoning as described in section 15183, or an environmental document prepared under a State certified regulatory program. The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration.

(2) The Lead Agency shall prepare a Negative Declaration if there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment.

(c) Purposes. The purposes of an Initial Study are to:

- (1) Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a Negative Declaration.*
- (2) Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration.*
- (3) Assist in the preparation of an EIR, if one is required, by:*
 - (A) Focusing the EIR on the effects determined to be significant,*
 - (B) Identifying the effects determined not to be significant,*
 - (C) Explaining the reasons for determining that potentially significant effects would not be significant, and*
 - (D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.*
- (4) Facilitate environmental assessment early in the design of a project;*
- (5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;*
- (6) Eliminate unnecessary EIRs;*
- (7) Determine whether a previously prepared EIR could be used with the project.*

(d) Contents. An Initial Study shall contain in brief form:

- (1) A description of the project including the location of the project;*
- (2) An identification of the environmental setting;*
- (3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries. The brief explanation may be either through a narrative or a reference to another information source such as an attached map, photographs, or an earlier EIR or negative declaration. A reference to another document should include, where appropriate, a citation to the page or pages where the information is found.*
- (4) A discussion of the ways to mitigate the significant effects identified, if any;*
- (5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;*

(6) *The name of the person or persons who prepared or participated in the Initial Study.*

Environmental Setting

The Project Site is located in the Hollywood Community Plan Area of the City of Los Angeles. The Project Site is not located within a specific plan area, historic preservation overlay zone or any other City designated districts. The 1.67-acre Project Site is located on Santa Monica Boulevard and is bound by Santa Monica Boulevard to the south, Orange Drive to the west, residential and office land uses to the north, and Mansfield Street to the east (refer to Figures 1 and 2). The addresses that comprise the Project Site are: 1100-1126 Orange Drive, 6909-6931 Santa Monica Boulevard, and 1107-1121 Mansfield Avenue. The Assessor Parcel Numbers (APNs) for the Project Site are 5532-017-010, 5532-017-011, and 5532-017-020. The Project Site is currently developed with 54,661 square feet of office and automobile storage buildings used for a towing business.

The existing land use designations for the Project Site are Highway Oriented Commercial and Medium Density Residential. The northern portion (2 parcels) of the Site is currently zoned R3-1XL (Multiple Dwelling Zone, Height District 1XL) with a height limit of 30 feet and a maximum permitted FAR of 3.0:1. The southern portion of the Site is currently zoned C2-1D (Commercial Zone, Height District 1, Development Limitations) with unlimited height and a maximum permitted FAR of 0.5:1, pursuant to the 'D' Limitation.

Properties located along the north side of Santa Monica Boulevard are zoned C2-1D and are improved with commercial buildings including a medical marijuana dispensary, youth center, office buildings, restaurant and office uses. Properties to the north of the Project Site are zoned R3-1XL and RD1.5XL and are improved with multi-family residential buildings. Properties to the northwest are zoned M1-1VL-SN and improved with a public storage building, production and media offices, retail and parking uses. Properties to the south of the Project Site are zoned MR1-1 and (Q)M1-1 and are improved with mostly single-story industrial or commercial buildings including production and recording studios, offices, warehouses and parking uses. Properties located just west of Sycamore Avenue are within the City of West Hollywood.

The Project Site neighboring properties to the east and west lie within a transition zone between industrial and medium density residential land use designations. The Project is located just outside of an industrial area known as the "Media District" which is an area designated to encourage the growth and maintenance of Hollywood's entertainment industry, with an emphasis on media production. The Highway Oriented Commercial designation is used to signify a separation between industrial and residential zones, two land use designations that are typically considered incompatible.

Proposed Project

The Project includes demolition and removal of the existing office and automobile storage buildings used for a towing business on the Project Site and development of the Project Site with a mixed-use building, including 7 stories of residential apartment units (231 total units) above 15,000 square feet of ground-floor neighborhood-serving commercial land uses (including up to a 5,000-square-foot high-turnover

restaurant and up to 10,000 square feet of general retail), and 2 levels of subterranean parking (refer to Figure 3 for the site plan and Figures 4 and 5 for the renderings). Approximately 8%, equal to 15 units, would be restricted for Very Low-Income households. The Project would have a total of 218,316 square feet, with a corresponding floor area ratio (FAR) of 3.0:1.

Height

The Project is a variable height, mixed-use development. The maximum height of the Project would be 80 feet 4 inches, to the top of the parapet, at the southern-most portion of the building. The building would step down twice as the project approaches the existing residential uses to the north, first to a height of approximately 54 feet and then further to approximately 23 feet, to the top of parapet.

Design/Architecture

Renderings which show the design and style of the Project are provided in Figures 4 and 5. The surrounding neighborhood has a contextual identity reminiscent of light manufacturing with a strong entertainment industry legacy. The Industrial Loft style concept for the Project has been developed to provide a specific connection to the architectural identity and history of the community. The buildings utilize a simple compositional massing along Santa Monica Boulevard, which provides visual variation consistent with the street edge along this corridor. The use of exterior materials has also been carefully selected to reinforce the Industrial Loft concept to include the use of board-form concrete to create street level paseos, industrial smooth plaster, rustic metal cladding, and frosted glass railings on the upper levels, finished with an industrial color palette are all components of the light manufacturing style.

The relationship between the Project and the pedestrian streetscape has been reinforced with corner glass pavilions, which provide a transparent interior-exterior relationship, and a landscaped paseo, which in addition to retail shops, would activate the street along Santa Monica Boulevard. The main resident lobby has been situated along the active edge of the Project Site at Santa Monica Boulevard. The architecture and flow of the Project has also been designed to integrate the building into the adjacent residential neighborhood. The massing and scale of the building is reduced through a series of gradual steps as the building proceeds to the north. Ground level residences have also been integrated into the Project along both Orange Drive and Mansfield Avenue to create a townhome row, which reinforces the residential scale of these secondary streets.

Parking

As shown on Table 1, the Project includes 390 vehicle parking spaces, including 360 residential parking spaces, and 30 commercial parking spaces. Additionally, the Project would include 270 bicycle parking spaces (refer to Table 2) and a 100 square-foot bicycle repair station on the ground level.

**Table 1
Project Vehicle Parking**

Land Use	LAMC Parking Requirement ^a	Parking Spaces Required
Residential		
71 Studio Units	1 space/unit	71 spaces
50 1-bedroom Units	1 space/unit	50 spaces
74 1-bedroom-plus-den Units	2 spaces/unit	148 spaces
36 2-bedroom Units	2 spaces/unit	72 spaces
<i>Total Residential Parking</i>		<i>341 spaces</i>
Commercial		
Retail/Restaurant – 15,000 sf	2 spaces/1,000 sf	30 spaces
<i>Total Parking Required</i>		<i>371 spaces</i>
15% Reduction (Residential)		- 50 spaces
20% Reduction (Commercial)		- 6 spaces
Total Parking Required		315 spaces
Total Parking Provided		390 spaces - 360 residential spaces - 30 commercial spaces
<i>sf = square feet</i> ^a LAMC Section 12.22-A,25(d)(1) permits projects qualifying for a Density Bonus to provide a minimum of one parking space per studio or one-bedroom unit and two parking spaces per two-bedroom unit. LAMC Section 12.21-A,4(x)(6) permits projects within any Enterprise Zone to provide a minimum of one space per 1,000 square feet of retail/restaurant uses.		

**Table 2
Project Bicycle Parking**

Land Use	LAMC Bicycle Parking Requirement ^a	Parking Spaces Required
231 residential dwelling units	Long-term: 1 space/du	231 spaces
	Short-term: 1 space/10 du	23 spaces
<i>Total Residential Bicycle Parking</i>		<i>254</i>
Retail/Restaurant – 15,000 sf	Long-term: 1 space/2,000 sf	8 spaces
	Short-term: 1 space/2,000 sf	8 spaces
<i>Total Commercial Bicycle Parking</i>		<i>16 spaces</i>
<i>Total Bicycle Parking Required</i>		<i>270 spaces</i>
Total Bicycle Parking Provided		270 spaces
<i>du = dwelling unit sf = square feet</i> ^a LAMC Section 12.21-A,16(a).		

Access

Vehicular access to the Project Site would be provided via two driveways: one on Orange Drive and one on Mansfield Avenue.

Open Space

The Project includes 31,869 square feet of open space. Level 3 includes an indoor club room and fitness center, a 9,111 square-foot main courtyard with a pool, spa, barbeque area and lounge area and a 10,393 square-foot north courtyard with a dog run, bocce court, sunning area, game area, barbeque area and fire pit. Level 6 includes a 2,150 square-foot deck area with seating. In addition, the townhomes located at Level 1 include private outdoor patios while the upper level residential units include private balconies. Table 3 details the open space required for the Project based on LAMC requirements. Table 4 includes a breakdown of the open space provided by the Project.

Table 3
Open Space Requirements for the Project

Residential Land Use	Number of Dwelling Units	Open Space Requirement ¹	Open Space (square feet)
<3 habitable rooms	121	100 sf/unit	12,100
3 habitable rooms	74	125 sf/unit	9,250
>3 habitable rooms	36	175 sf/unit	6,300
<i>Total Open Space Required</i>			27,650
Total Open Space Provided			31,869
¹ LAMC 12.21-G,2: New construction (resulting in additional floor area and additional units) of a building or group of buildings containing six or more dwelling units on a lot shall provide at a minimum the following usable open space per dwelling unit: 100 square feet for each unit having less than three habitable rooms; 125 square feet for each unit having three habitable rooms; and 175 square feet for each unit having more than three habitable rooms. Kitchens do not count as habitable rooms for open space calculations.			

Table 4
Open Space Provided by the Project

Provided Open Space	Size (square feet)
3rd Level Main Courtyard	9,111
3 rd Level North Courtyard	10,393
6th Level Deck	2,150
Club Room and Fitness Center	4,465
Private Open Space (balconies)	5,750
Total Open Space Provided	31,869
<i>Source: RC Architecture, 2015.</i>	

Landscaping

Figures 6 through 8 provide the landscaping plans for the ground level, 3rd level, and 6th level, respectively. The ground level would include landscaping around the perimeter of the Project Site, which would include various trees, shrubs, and perennials. In addition, a landscaped paseo would be provided on the ground level, which in addition to retail shops, would activate the street at Santa Monica Boulevard. The third level would include two separate and distinct landscaped amenity areas. One area includes a pool, spa, lounge, and landscaped courtyard area. The second landscaped area includes multiple seating

areas, a game area, bocce court, barbeques, and fire pits. Finally the 6th level would include a landscaped deck with various seating areas.

Lighting/Signage/Site Security

For site security, the Project would include the following features: on-site security guards; key card entrances for the residential portion; locked security gates; and a 24/7 concierge. In addition, night lighting for security and wayfinding would be provided. Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances and pedestrian entrances.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).¹

Construction

Project construction is expected to take approximately 18 months. It is expected that approximately 78,000 cubic yards of dirt would be exported from the Project Site.

Discretionary and Ministerial Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. The Project, as proposed, would require approval of the following actions from the City:

Discretionary Actions:

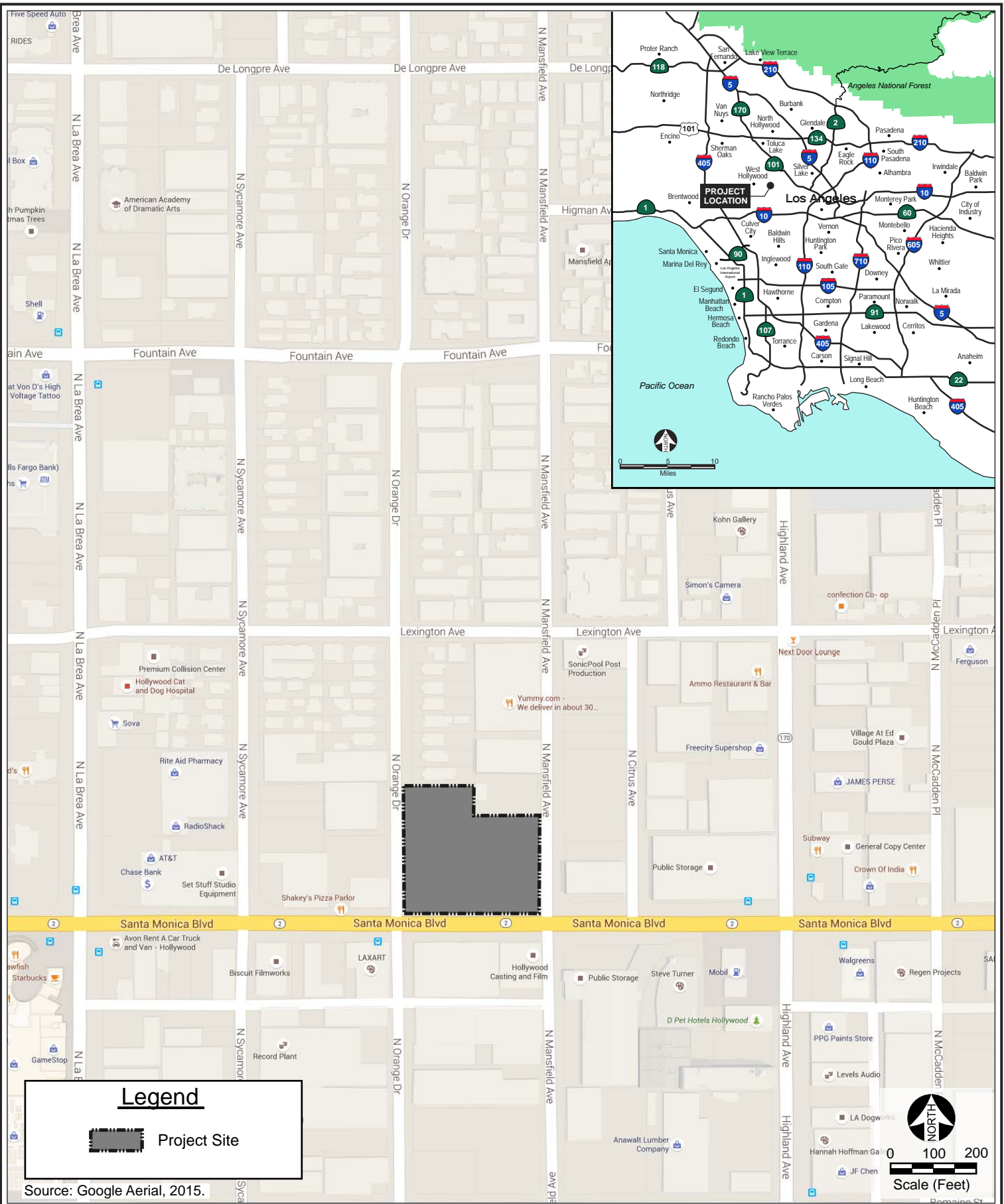
- A General Plan Amendment, pursuant to City Charter Section 555 and Los Angeles Municipal Code Section 11.5.6, to amend the Property's Hollywood Community Plan land use designation from Highway Oriented Commercial and Medium Density Residential to Neighborhood Commercial;
- A Vesting Zone and Height District Change, pursuant to LAMC Section 12.32, to change the Property's zoning from C2-1D and R3-1XL to C2-2D, with a D limitation restricting maximum FAR to 3:1 in lieu of 6:1 otherwise permitted in Height District 2;
- A Zoning Administrator's Adjustment, pursuant to Section 12.28-A, to permit a zero-foot side yard along Santa Monica Boulevard in lieu of the ten feet otherwise required by LAMC Sections 12.14-C,2 and 12.11-C,2;

¹ Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>

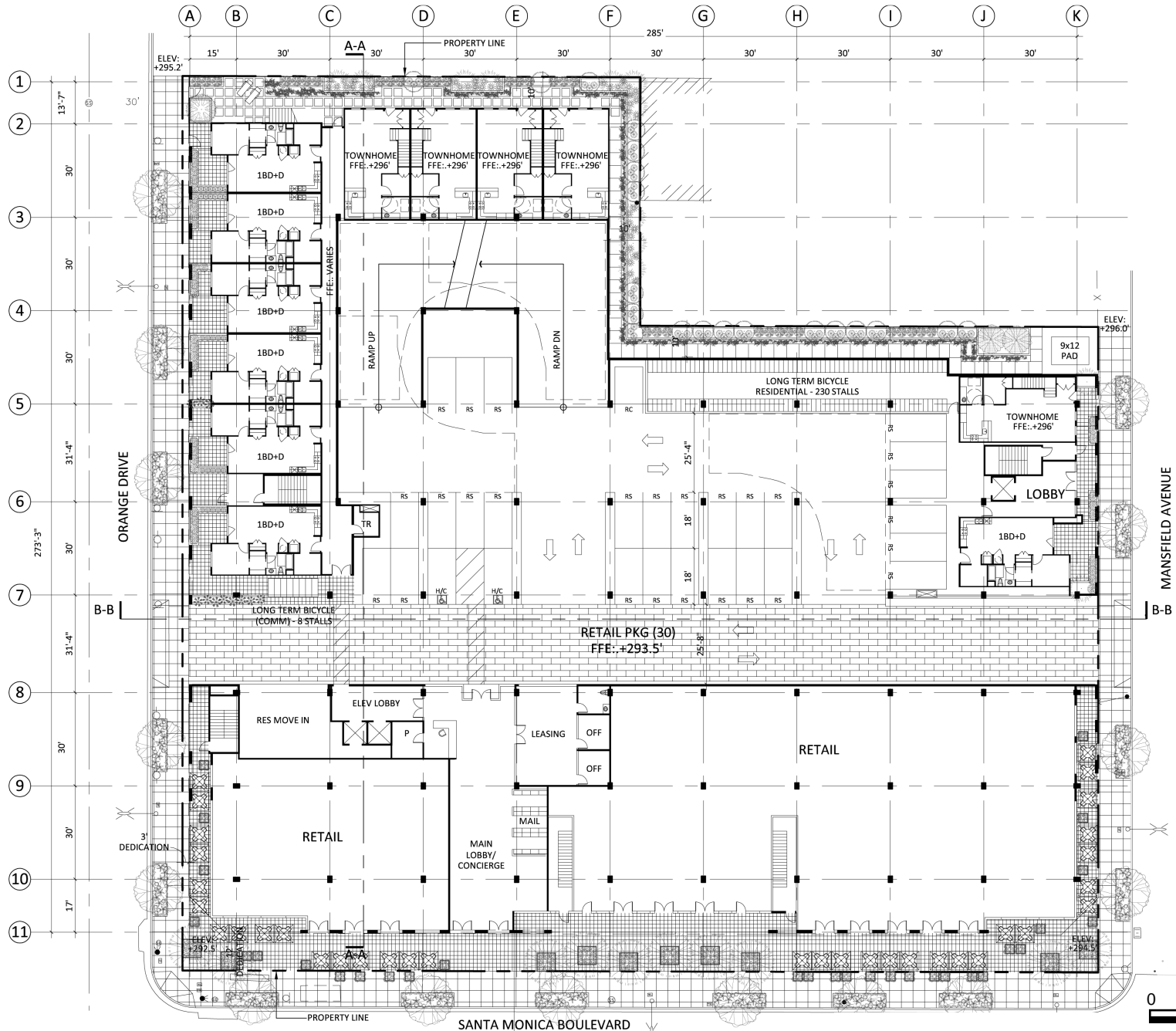
- A Master Conditional Use Permit, pursuant to LAMC Section 12.24-W,1, to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption within up to three tenant spaces; and
- Site Plan Review, pursuant to LAMC Section 16.05-C, for a project that results in an increase of more than 50 dwelling units.

Ministerial Actions:

- 35% density bonus pursuant to LAMC Section 12.22-A,25;
- Demolition, grading, and building permits;
- Haul Route approval; and
- Other approvals as deemed necessary by the City.







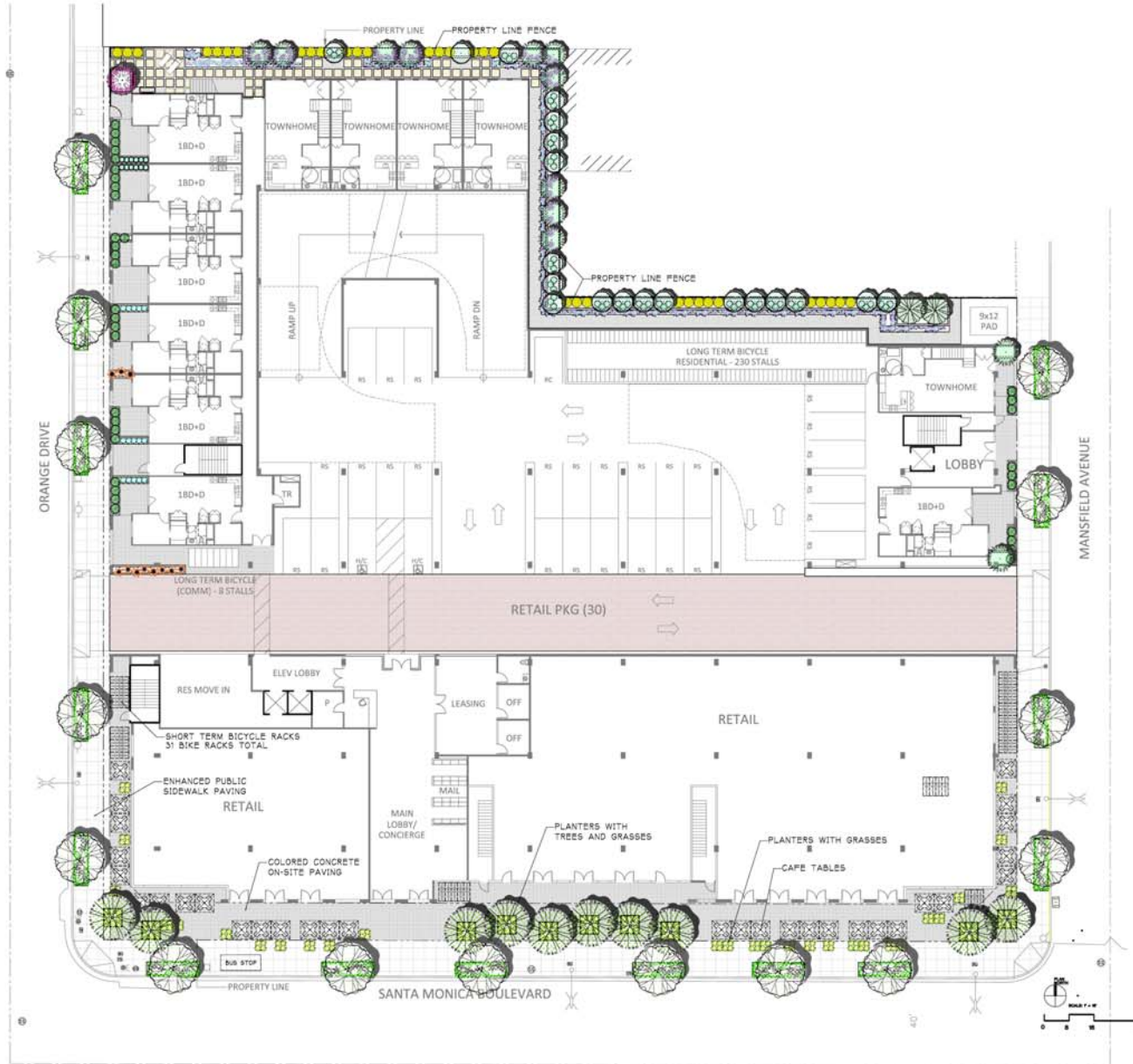
Source: Roschen Van Cleve Architects, 2015.



Source: Roschen Van Cleve Architects, December 14, 2015.









Source: Roschen Van Cleve Architects, December 14, 2015.



PLANT LIST

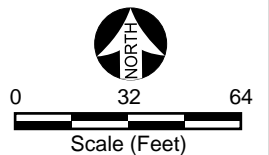
TREES

-  AGONIS FLEXUOSA "AFTERDARK"
PURPLE PEPPERMINT TREE
-  CASSIA LEPTOPHYLLA
GOLD MEDALION TREE
-  GLEDITZIA TRIACANTHOS
HONEY LOCUST
-  TRISTANIA CONFERTA
BRISBANE BOX
-  PITTOSPORUM TENUIFOLIUM
"SILVER SHEEN"
-  PODOCARPUS ELONGATUS
"ICEE BLUE"
BLUE PODOCARPUS

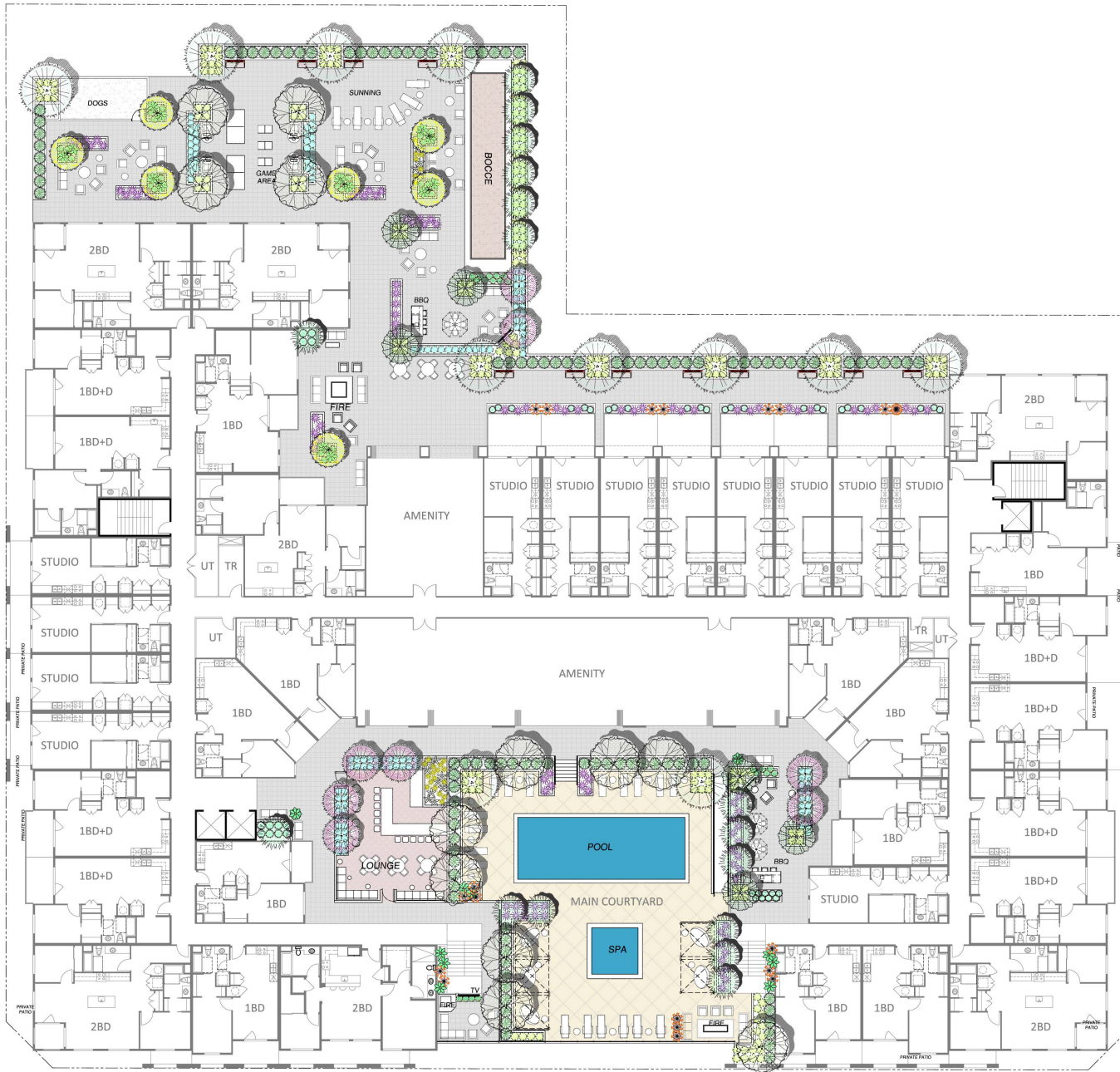
SHRUBS & PERENNIALS

-  ANIGOZANTHOS Hy 'HARMONY'
-  AGAVE ATTENUATA VARIEGATA
-  CORDYLINE Hy 'ELECTRIC PINK'
-  PHORMIUM "BRONZE BABY"
-  DIANELLA "SILVER STREAK"
-  EUPHORBIA "STICKS ON FIRE"
-  MYRTUS COMMUNIS
(HEDGED)
-  NANDINA DOMESTICA
-  OLEA EUROPAEA "LITTLE OLLIE"
(HEDGED)
-  ORNAMENTAL GRASSES
MISCANTHUS "ARABESQUE"
SESSLERIA AUTUMNALIS

LEVEL 1



Source: Caeter Romanek Landscape Architects Inc., December 14, 2015.



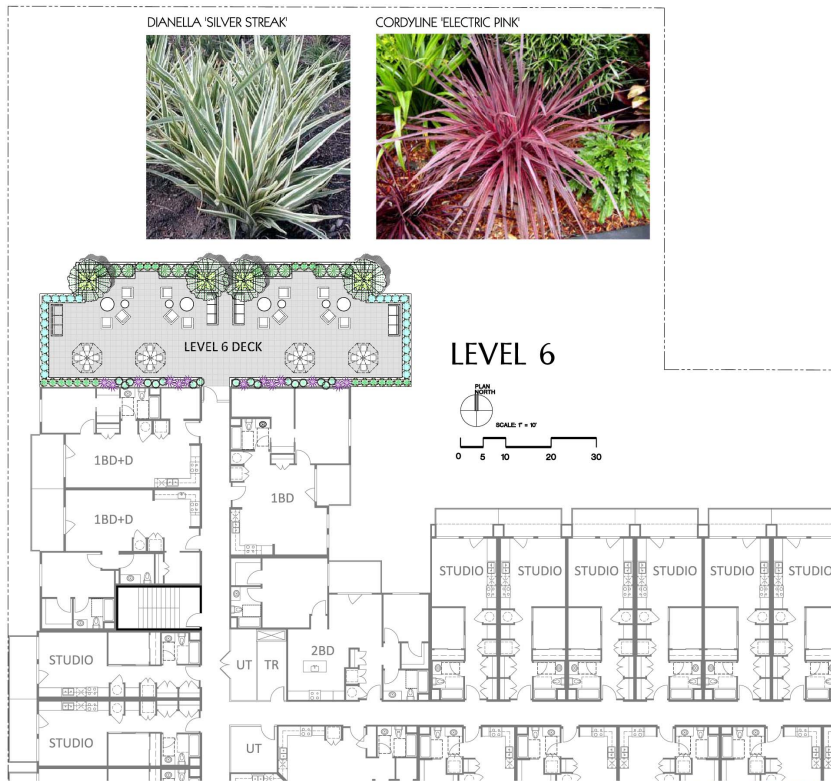
PLANT LIST

- TREES
- AGONIS FLEXUOSA "AFTERDARK"
PURPLE PEPPERMINT TREE
 - CASSIA LEPTOPHYLLA
GOLD MEDALION TREE
 - CERODIUM "DESERT MUSEUM"
HYBRID PALO VERDE
 - GLEDITZIA TRIACANTHOS
HONEY LOCUST
 - OLEA EUROPAEA
"MAJESTIC BEAUTY"
NON-FRUITING OLIVE
 - PODOCARPUS ELONGATUS
"ICE BLUE"
BLUE PODOCARPUS
- SHRUBS & PERENNIALS
- ANIGOZANTHOS Hy "HARMONY"
 - AGAVE ATTENUATA VARIEGATA
 - CORDYLINE Hy "ELECTRIC PINK"
 - PHORMIUM "BRONZE BABY"
 - DIANELLA "SILVER STREAK"
 - EUPHORBIA "STICKS ON FIRE"
 - MYRTUS COMMUNIS (HEDGED)
 - OLEA EUROPAEA "LITTLE OLLIE" (HEDGED)
 - ORNAMENTAL GRASSES
MISCANTHUS "ARABESQUE"
SESSLERIA AUTUMNALIS
 - YUCCA RECURVIFOLIA

LEVEL 3



Source: Caeter Romanek Landscape Architects Inc., December 14, 2015.



DIANELLA 'SILVER STREAK'



CORDYLINAE 'ELECTRIC PINK'

PLANTS FOR ALL LEVELS

PLANT LIST

- TREES
 - CASSIA LEPTOPHYLLA GOLD MEDALION TREE
- SHRUBS & PERENNIALS
 - ANGOZANTHOS Hy 'HARMONY'
 - AGAVE ATTENUATA VARIEGATA
 - CORDYLINAE Hy 'ELECTRIC PINK'
 - PHORMIUM 'BRONZE BABY'
 - DIANELLA 'SILVER STREAK'
 - EUPHORBIA 'STICKS ON FIRE'
 - MYRTUS COMMUNIS (HEDGED)
 - OLEA EUROPAEA 'LITTLE OLLIE' (HEDGED)



FRUITLESS OLIVE



PITOSPORUM 'SILVER SHEEN'



CASSIA LEPTOPHYLLA



EUPHORBIA 'STICKS ON FIRE'



OLEA 'LITTLE OLLIE'



GLEDITSIA TRIACANTHOS



PODOCARPUS 'ICE BLUE'



TRISTANIA CONFERTA



MISCANTHUS ARABESQUE



SESSLERIA AUTUMNALIS

Source: Caeter Romanek Landscape Architects Inc., December 14, 2015.

2. INITIAL STUDY CHECKLIST

LEAD CITY AGENCY City of Los Angeles	COUNCIL DISTRICT 4, David Ryu	DATE February 2016
RESPONSIBLE AGENCIES City of Los Angeles		
PROJECT TITLE/NO. 6901 Santa Monica Boulevard Mixed-Use Project		CASE NO. 2015-4612-EIR
PREVIOUS ACTIONS CASE NO. N/A	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: See Section 1 (Project Description).		
ENVIRONMENTAL SETTING: See Section 1 (Project Description).		
PROJECT LOCATION 1100, 1106, 1110, 1114, 1118, 1122, 1126 Orange Drive; 6909, 6911, 6917, 6921, 6931 Santa Monica Boulevard; and 1107, 1111, 1115, 1119, 1121 Mansfield Avenue, Los Angeles, CA 90038		
PLANNING DISTRICT Hollywood Community Plan Area		STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED
EXISTING ZONING R3-1XL, C2-1D	MAX. DENSITY ZONING C2: 1 unit/400 square feet R3: 1 unit/800 square feet	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN
PLANNED LAND USE & ZONE Neighborhood Commercial C2-2D	MAX. DENSITY PLAN C2: 1 unit/400 square feet R3: 1 unit/800 square feet	
SURROUNDING LAND USES RD1.5XL, R3-1XL, C2-1D, MR1-1, M1-1VL-SN	PROJECT DENSITY 1 unit/400 square feet	

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.

Sarah Moline Pearson
Signature

City Planning Associate
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 than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - 1) Earlier Analysis Used. Identify and state where they are available for review.
 - 2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - 3) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared

or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

- 7) **Supporting Information Sources:** A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - 1) The significance criteria or threshold, if any, used to evaluate each question; and
 - 2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

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

BACKGROUND

PROPONENT NAME

Onni Santa Monica, LP

PHONE NUMBER

213-629-2041

PROPONENT ADDRESS

315 W. 9th Street, Suite 801, Los Angeles, CA 90015

AGENCY REQUIRING CHECKLIST

City of Los Angeles Planning Department

DATE SUBMITTED

February 2016

ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA to provide that Aesthetic impacts of infill mixed-use projects “shall not be considered significant impacts on the environment.” However, the following discussion provides an analysis and disclosure of the potential aesthetic impacts of the Project.

Response a:

A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is in an urbanized portion of Los Angeles, and topographically relatively flat. Near the Project Site, ground-level views are primarily limited to those of the mix of highly urban land uses, including manufacturing/warehouse, restaurant, office and multi- and single-family residential, in addition to roadways, signage, and other utility infrastructure. Due to topography, vegetation, and development, medium and long-distance views are not available from the Project Site area. The Project Site is not visible within any scenic views. Therefore, the Project would not have any adverse effect on a scenic vista, and no impacts related to this issue would occur. No further analysis of this issue is required.

Response b:

A significant impact would occur only where scenic resources would be damaged or removed by the project. None of the roadways near the Project site is a scenic highway and no rock outcroppings or historic buildings are located on the Project site. Therefore, the Project would not result in any significant impacts related to scenic resources, and no further analysis of this issue is required.

Response c:

A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. The Project would increase the building height on the Project Site from existing uses, and would introduce new architectural elements to the area. The potential to create visual elements that would be incompatible with the character of the area, including shade and shadow impacts to sensitive receptors, will therefore be analyzed in the EIR.

Response d:

A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Site or which pose a safety hazard, such as to motorists utilizing adjacent streets. The Project Site and surrounding area are developed with a mix of manufacturing/warehouse, restaurant, retail, office, and multi- and single-family residential land uses and roadway and utility infrastructure, all of which produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, etc.) typical of such uses in a highly urbanized area of the City. The Project includes development with the Project Site with 231 multi-family residential units and 15,000 square feet of neighborhood-serving commercial uses, which could add new sources of light and glare. Therefore, this issue will be addressed in the EIR.

	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Potentially Significant 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 the Forest

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Responses a-e:

A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use, the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use, results in the rezoning of forest land or timberland, or involves other changes in the existing environment which, could result in conversion of Farmland to non-agricultural use. The Project Site is currently developed with automobile land uses. 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.² The Site is zoned commercial (C2) and residential (R3). No Williamson Act Contract applies to the Site. Therefore, no impact would occur and no further analysis of this issue is required.

² State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.

	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:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	■	□	□	□
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	■	□	□	□
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard including releasing emissions which exceed quantitative thresholds for ozone precursors?	■	□	□	□
d. Expose sensitive receptors to substantial pollutant concentrations?	■	□	□	□
e. Create objectionable odors affecting a substantial number of people?	□	□	□	■

Response a:

A significant impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. 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], PM₁₀, 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.³ With regard to air quality planning, SCAG has prepared the Regional

³ SCAG is the federally designated metropolitan planning organization (MPO) for Southern California region.

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 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. 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:

A project would result in a significant air quality impact if project-related emissions exceed federal, State or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. Construction and operation of the Project has the potential to generate emissions which could exceed federal, State, or regional standards or thresholds or contribute to an existing or projected air quality violation. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact would occur if the Project would result in a cumulatively considerable net increase in a federal or State non-attainment pollutant. 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 or State non-attainment pollutant. Therefore, this issue will be analyzed further in an EIR.

Response d:

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.⁴ The Project could expose these sensitive receptors to substantial pollutant concentrations. Therefore, this issue will be analyzed further in an EIR.

⁴ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, Figure 5-1, April 1993.

Response e:

A significant impact would only occur if the Project would generate substantial odors. 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.

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. Mandatory compliance with SCAQMD Rules prohibiting construction activities or materials that would create a significant level of objectionable odors and limits potential objectionable odor impacts during the Project’s short-term construction phase. The Project would not create objectionable odors affecting a substantial number of people during construction or long-term operation because it does not include uses associated with common odor complaints. Therefore, no impact would occur and no further analysis of this issue is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. Biological Resources. Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response a:

A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the State or federal regulatory agencies cited above. The Project Site is located in a highly urbanized area of the City and is surrounded by existing residential development, and therefore it is not expected that the Project area contains habitat for any species identified or designated as a candidate, sensitive, or special status species. However, development of the Project would require removal of existing trees. Depending on the time of year that the Project Site is developed, nesting birds (which are protected by law) could inhabit the trees on the Project Site. As such, the Project Applicant would be required to implement the following standard City mitigation measure to ensure that no significant impacts related to nesting birds would occur. Therefore, impacts related to this issue would be less than significant, and no further analysis of this issue is required.

Mitigation Measure

4-1: Nesting Species

To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Conduct vegetation removal associated with construction from September 1st through January 31st, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1st through August 31st) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest

abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.

OR...

- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

Response b:

A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited would be adversely modified by a project. The Project Site and surrounding area are completely developed with highly urbanized land uses. No riparian habitat or sensitive natural communities are located on or near the Project Site. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur, and no further analysis of this issue is required.

Response c:

A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. The Project Site and surrounding area are completely developed with highly urbanized land uses. No wetlands are located on or near the Project

Site.⁵ Thus, the Project would not 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. Therefore, no impacts related to this issue would occur, and no further analysis of this issue is required.

Response d:

A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site and surrounding area are completely developed with highly urbanized land uses and are not part of a migratory wildlife corridor or near a native wildlife nursery site. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, no impacts related to this issue would occur, and no further analysis of this issue is required.

Response e:

A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. The Project would be confined to the previously developed Site and would not involve substantial changes in the existing environment. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404. Any removed native tree would need to comply with the ordinance. Therefore, the Project would result in a less than significant impact related to this issue, and no further analysis of this issue is required.

Response f:

A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impacts related to this issue would occur. No further analysis of this issue is required.

⁵ U.S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Response a:

Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions. No historic structures are located on the Project Site. Thus, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the Project, and no further analysis of this issue is required.

Response b:

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which met the criteria for historical resources, 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. There are no known archaeological resources within the Project Site. However, the excavation for the subterranean parking levels has the potential to affect unknown archaeological resources. Implementation of the following standard City mitigation measure would be required to ensure that impacts with respect to archaeological resources are less than significant. In the event any of the tribes consulted, pursuant to the requirements of AB 52, have

reason to believe that the Project Site may contain any archaeological resources, further analysis may be required in the EIR.

Mitigation Measure

5-1: Cultural Resources (Archaeology)

If any archaeological materials are encountered during the course of Project development, all further development activity shall be halted in the area of the discovery and:

- a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center located at California State University Fullerton, or a member of the Society of Professional Archaeologists (SOPA), or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- b. The archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.
- d. Project development activities may resume once copies of the archaeological survey, study, or report are submitted to the South Central Coastal Information Center at California State University Fullerton.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

Response c:

A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. There are no known paleontological resources within the Project Site. However, the excavation for the subterranean parking levels has the potential to affect unknown paleontological resources. Implementation of the following standard City mitigation measure would be required to ensure that impacts with respect to paleontological resources are less than significant. Therefore, further analysis of this issue in the EIR is not required.

Mitigation Measure**5-2: Cultural Resources (Paleontology)**

If any paleontological materials are encountered during the course of Project development, all further development activities shall be halted in the area of the discovery and:

- a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology – USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum – who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- b. The paleontologist’s survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
- d. Project development activities may resume once copies of the paleontological survey, study, or report are submitted to the Los Angeles County Natural History Museum.
- e. Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.
- f. A covenant and agreement binding the applicant to this condition shall be recorded prior to the issuance of a grading permit.

Response d:

A project-related significant adverse effect could occur if grading or excavation activities associated with the proposed project would disturb previously interred human remains. The Project Site is located in a heavily urbanized area, and is currently developed with automotive uses. The likelihood of encountering human remains on the Project Site is minimal. However, during the construction and excavation of the Project Site, there is a possibility that human remains could be encountered. Implementation of the following standard City mitigation measure would be required to ensure that impacts with respect to human remains are less than significant. In the event any of the tribes consulted, pursuant to the requirements of AB 52, have reason to believe that the Project Site may contain human remains, further analysis may be required in the EIR.

Mitigation Measure

5-3: In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- a. Stop immediately and contact the County Coroner.
- b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the coroner has 24 hours to notify the Native American Heritage Commission.
- c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendant of the deceased Native American.
- d. The most likely descendant has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- e. If the descendant does not make recommendations within 48 hours, the owner shall reinter the remains in an area of the property secure from further disturbance.
- f. If the owner does not accept the descendant’s recommendations, the owner or the descendant may request mediation by the Native American Heritage Commission.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VI. Geology and Soils. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	■	□	□	□
ii. Strong seismic ground shaking?	■	□	□	□
iii. Seismic-related ground failure, including liquefaction?	■	□	□	□
iv. Landslides?	□	□	□	■
b. Result in substantial soil erosion or the loss of topsoil?	■	□	□	□

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

Response a.i:

Given the Project Site’s location in a seismically active region, the Project Site could potentially experience fault rupture in the event of an earthquake. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response a.ii:

A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing 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. Southern California is active seismic region (UBC Seismic Zone IV). Given the Project Site’s location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response a.iii:

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response a.iv:

A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding. Landslides can occur on slopes under normal gravitational forces

and during earthquakes when strong ground motion can cause failure. Landslides tend to occur in loosely consolidated, wet soil, and/or rock on unstable sloping terrain. The Project Site and surrounding area are flat and do not contain any areas that contain landslides. Therefore, no impacts related to this issue would occur, and no further analysis of this issue is required.

Response b:

A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The construction and operational activities associated with the Project could cause erosion. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response c:

A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The degree to which geologic or soil instabilities exist at the Project Site are unknown at this time. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response d:

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. The degree to which expansive soils exist at the Project Site is unknown at this time. A geotechnical report is being prepared for the Project, and this issue will be addressed in the EIR.

Response e:

A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, 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 they proposed. Therefore, no impact would occur and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 | ■ | □ | □ | □ |

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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for the purpose of reducing the emissions of greenhouse gases?

Responses a and b:

Construction and operation of the Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. In addition, the Project will need to be fully evaluated for consistency with all applicable plans, policies, and regulations for the purpose of reducing the emissions of greenhouse gases. Therefore, the Project’s generation of greenhouse gas emissions and consistency with plans will be analyzed in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. Hazards and Hazardous Materials. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
the project 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?	□	□	□	■

Response a:

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 Project includes development of the Project Site with typical commercial and residential land uses similar to those already found in the Project area. These uses would use common types of cleaning products, paint, petroleum products, etc. The Project would not require the transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. However, the Project includes the demolition and removal of the existing automobile land uses on the Project Site. Therefore, the potential exists for the Project to create a significant hazard to the public or environment through upset or accident conditions involving the release of hazardous materials into the environment during demolition and construction. As such, this issue will be addressed in the EIR.

Response b:

A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions. The Project includes the demolition and removal of the existing automobile land uses on the Project Site. Therefore, the potential exists for the Project to create a significant hazard to the public or environment through upset or accident conditions involving the release of hazardous materials into the environment. As such, this issue will be addressed in the EIR.

Response c:

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 includes development of the Project Site with typical commercial and residential land uses similar to those already found in the Project area. These uses would use common types of cleaning products, paint, petroleum products, etc. The Project would not require the transport,

use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Also, there are no existing or proposed schools within one-quarter mile of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur and no further analysis of this issue is required.

Response d:

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. The Project Site is not currently included on any list compiled pursuant to Government Code Section 65962.5. Nevertheless, because of the automotive uses currently located on the Project Site, a Phase I Environmental Site Assessment is being prepared. Therefore, this issue will be analyzed further in the EIR.

Responses e and f:

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 not located in the vicinity of a public airport or private airstrip. Therefore, no impact would occur and no further analysis of this issue is required.

Response g:

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. It is unknown whether the Project would generate traffic congestion or otherwise interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan (such as along Santa Monica Boulevard which is a designated Selected Disaster Route). Therefore, this issue will be analyzed in the EIR.

Response h:

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 located in a highly urbanized area of the City and is not subject to wildland fire hazards.⁶ Thus, the Project would not 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

⁶ City of Los Angeles General Plan, Safety Element, Exhibit D, 1996.

intermixed with wildlands. Therefore, no impacts related to this issue would occur and no further analysis of this issue is 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response a:

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 includes development of the Project Site with typical commercial and residential land uses similar to those already found in the Project area. 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. However, the Project would comply with all applicable water standards, including the City’s Low Impact (LID) Development Ordinance No. 181,899. Therefore, the Project would have a less than significant impact related to this issue and no further analysis of this issue is required.

Response b:

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 Site and the surrounding area are completely developed. During storm events, all runoff ultimately enters the City’s storm drain system. Storm water in the Project area does not reach groundwater level. As such, the Project Site is not a source of groundwater recharge. Under the Project, this condition would remain unaltered. Additionally, all water consumption associated with the Project would be supplied by the Metropolitan Water District (MWD) and not from groundwater beneath the Project site. Finally, the proposed subterranean garage would not impact groundwater. Thus, the Project would have no effect on groundwater supplies or recharge, and no impacts related to this issue would occur, and no further analysis of this issue is required.

Response c:

During the Project’s construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction

include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion and siltation during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, less than significant impacts related to erosion and siltation would occur as a result of Project operation, and no further analysis of this issue is required.

Response d:

The Project site is currently developed with impervious surfaces. As such, during storm events, most of the stormwater flows from the site to the local streets where the runoff enters the City's stormdrain system. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing stormdrain facilities. As such, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to stormdrain capacity would be less than significant, and no further analysis of this issue is required.

Response e:

Refer to Checklist Question and Response IX(d), above.

Response f:

To address water quality during the Project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to

review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant, and no further analysis of this issue is required.

During the Project's construction phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet the City's water quality standards. Therefore, Project impacts related to operational water quality would be less than significant, and no further analysis of this issue is required.

Response g-h:

The Project Site is not located within an area identified by Federal Emergency Management Agency (FEMA) as potentially subject to 100-year floods⁷. As the Site is located in an area of minimal flooding, the 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.

Response i:

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 located within a potential inundation area.⁸ However, these areas (including all dams and levees), as with other reservoirs and dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the US Army Corps of Engineers) to guard against the threat of dam and reservoir failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams and reservoirs are intended to ensure that all dams and reservoirs are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the development of the Project. No impact would occur and no further analysis of this issue is required.

⁷ City of Los Angeles General Plan, Safety Element, Exhibit F, 1996.

⁸ City of Los Angeles General Plan, Safety Element, Exhibit G, 1996.

Response j:

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 in an area susceptible to seiches, tsunamis, or mudflows.⁹ Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impact would occur and no further analysis of this issue is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. Land Use And Planning. Would the project:

a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Response a:

A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized area of the City and is developed with automotive land uses. Additionally, the Project Site is largely surrounded by existing development and roadways. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur, and no further analysis of this issue is required.

Response b:

A significant impact may occur if a project is inconsistent with the General Plan or zoning designations

⁹ City of Los Angeles General Plan, Safety Element, Exhibit G, 1996.

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 by the City. The EIR will provide additional analysis to assess the consistency with applicable General Plan policies, zoning code restrictions, Southern California Association of Governments (SCAG) policies, any other applicable City (such as the Hollywood Community Plan) or regional plans and policies (such as the SCAQMD and Metro CMP).

Response c:

A significant impact may occur if a project is inconsistent with policies in any draft or adopted conservation plan. The Project Site was previously developed and is located in an urbanized area. As discussed under Checklist Question and Response 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. No impact would occur and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. Mineral Resources. Would the project:

- | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. | Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. | Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Response a:

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 located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity and the Project Site is not located within an oil field or oil drilling area, and is not part of any Oil Drilling and Surface Mining Supplemental Use District.¹⁰ Thus, the Project would not 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. Therefore, no impacts related to issue would occur, and no further analysis of this issue is required.

¹⁰ City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: <http://cityplanning.lacity.org/cwd/gnlpln/safetyelt.pdf>, accessed December 21, 2015.

Response b:

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. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site.¹¹ Thus, the Project would not 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. Therefore, no impacts related to issue would occur, and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. Noise. Would the project result in:

a. Exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹¹ Ibid.

Response a:

A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Construction would require the use of construction equipment during grading, excavation, hauling, establishing building foundations, and other construction activities. The concurrent use of construction equipment and machinery has the potential to increase noise levels above the applicable standards of the City's Noise Ordinance. Existing on-site noise sources include the existing automobile uses. The Project would increase the activities that would occur on the Site and noise levels from on-site sources also have the potential to increase during Project operation. In addition, the traffic attributable to the Project has the potential to cause noise levels to exceed City Noise Ordinance standards. Therefore, this issue will be analyzed further in an EIR.

Response b:

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, establishing building foundations, and other construction activities. The use of earthmoving equipment and machinery has the potential to cause groundborne vibration and noise. During operation, ground-borne vibration may also occur from increased road traffic or other on-site activities. Therefore, this issue will be analyzed further in an EIR.

Response c:

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. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, this issue will be analyzed further in an EIR.

Response d:

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 Project or on a periodic basis during the operation of the Project. As discussed above, construction activity has 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. Therefore, this issue will be analyzed further in an EIR.

Response e:

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 Project. As discussed under Checklist Question and

Response VIII(e), 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 not expose people residing or working in the Project area to excessive noise levels from an airport use. No impact would occur and no further analysis of this issue is required.

Response f:

A significant impact may occur if a project is located within the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. As discussed under Checklist Question and Response VIII(f), there are no private airstrips in the vicinity of the Site. The Project would not expose people residing or working in the area to excessive noise levels from an airport use. No impact would occur and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. Population And Housing. Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■

Response a:

The Project would add 231 multi-family residential units to the Project Site, and as such, the Project could increase the number of residents in the Project area. Therefore, this issue will be addressed in the EIR.

Response b:

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 because there is no housing on the Site. Further, the Project would develop residential units. Therefore, no impact would occur and further evaluation in an EIR is not required.

Response c:

A significant impact may occur if a project would result in displacement of existing residents, necessitating the construction of replacement housing elsewhere. As there is no housing on the Site, the Project would not displace any people necessitating 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
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XIV. Public Services. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response a:

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. The Project is served by several fire stations, including:

- Fire Station No. 27, located at 1327 North Cole Avenue, approximately 0.9 mile from the Site.
- Fire Station No. 41, located at 1439 North Gardner Street, approximately 1.1 miles from the Site.
- Fire Station No. 61, located at 5821 West 3rd Street, approximately 2.1 miles from the Site.
- Fire Station No. 82, located at 5769 Hollywood Boulevard, approximately 2.2 miles from the Site.
- Fire Station No. 52, located at 4957 Melrose Avenue, approximately 2.4 miles from the Site.

The Project would increase the intensity of development at the Project Site, and therefore, the potential impact of the Project on fire protection services will be analyzed in the EIR.

Response b:

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 Project would increase the intensity of development at the Project Site, and therefore, the potential impacts of the Project on police protection services will be analyzed in the EIR.

Response c:

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). The Project would directly impact local schools by providing new housing to families with school-age children, and indirectly impact schools by providing jobs that may cause employees with families to relocate to an area. Thus, the potential impact of the Project on school facilities will be analyzed in the EIR.

Response d:

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, 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. The EIR will evaluate the Project's on-site open space and recreational amenities and will determine the impacts on park facilities.

Response e:

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site, 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 Los Angeles Public Library (LAPL). Residential developments typically have the greatest potential to result in impacts to libraries since they generate a permanent increase in residential population. The EIR will evaluate the Project's impacts upon library facilities.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. Recreation.

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| a. | Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ■ | □ | □ | □ |
| b. | Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | □ | □ | ■ | □ |

Response a:

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, Parks). While on-site open space and recreational amenities would be included within the Project designs, 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:

The Project includes 31,869 square feet of open space, which exceeds the amount of open space required by the LAMC. Level 3 includes an indoor club room and fitness center, a 9,111 square-foot main courtyard with a pool, spa, barbeque area and lounge area and a 10,393 square-foot north courtyard with a dog run, bocce court, sunning area, game area, barbeque area and fire pit. Level 6 includes a 2,150 square-foot deck area with seating. In addition, the townhomes located at Level 1 include private outdoor patios while the upper level residential units include private balconies. Inclusion of these Project amenities would reduce any potential impacts to parks such that the Project would not cause substantial deterioration of park and recreational facilities. Therefore, impacts related to recreational facilities would be less than significant and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVI. Transportation/Traffic.

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	■
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response a:

A significant impact would occur if a Project generated traffic at each study intersection that would exceed City of Los Angeles Department of Transportation (LADOT) standards. According to LADOT policy, a significant project impact would occur when the Critical Movement Analysis (CMA) value increases by 0.010 or more when the final Level of Service (LOS) at a given study intersection is E or F, by 0.020 or more when the final LOS is D, or by 0.040 or more when the final LOS is C. It is unknown at this time whether the Project may result in a potentially significant traffic impact during operation and construction. The potential impacts of the Project are currently being evaluated in a traffic study in

accordance with the assumptions, methodology, and procedures approved by LADOT. Therefore, this issue will be analyzed further in an EIR.

Response b:

A significant impact may occur if adopted California Department of Transportation (Caltrans) and County of Los Angeles Metropolitan Transit Authority (MTA) thresholds are exceeded. The Congestion Management Program (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. Therefore, this issue will be analyzed further in an EIR.

Response c:

A significant impact would occur if a 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. Furthermore, as discussed under Checklist Question and Response VIII(e), 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. Safety risks associated with a change in air traffic patterns would not occur. Therefore, no impact would occur and further evaluation in an EIR is not required.

Response d:

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. However, no incompatible use would occur. The driveway width and queuing length will be evaluated to ensure there is adequate space to accommodate the vehicles for the Project. Therefore, this issue will be analyzed further in an EIR.

Response e:

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 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 traffic impacts.

Response f:

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. The potential of the Project to conflict with adopted policies, plans, and programs supporting alternative transportation will be analyzed in the EIR.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. Utilities and Service Systems. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	■	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	■	<input type="checkbox"/>

Response a:

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 State's wastewater treatment requirements which, in the project area, are enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB). The HTP has a current capacity of 450 million gallons per day (mgd). The potential to exceed wastewater treatment requirements of the LARWQCB will be analyzed in the EIR.

Response b:

A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the site would be exceeded. The Project is expected to increase water usage and wastewater generation as compared to the existing uses on the Project Site. It is not known whether the Project may result in a 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. Thus, potential impacts to the public water and wastewater infrastructure system will be analyzed in the EIR.

Response c:

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. As discussed in response to Checklist Question and Response IX(e), the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant, and no further analysis of this issue is required.

Response d:

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 uses on the Site. Any potential impacts with respect to water supply will be analyzed in the EIR.

Response e:

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 and Response XVII(b), the Project is estimated to generate an increase in wastewater as compared to the existing development on the Site. Therefore, potential impacts related to wastewater treatment plant capacity and availability will be analyzed in the EIR.

Response f:

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. The potential impacts associated with the ability of the local landfills to serve the Project will be analyzed in the EIR.

Response g:

Solid waste management is guided by the California Integrated Waste Management Act of 1989 (AB 939), 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, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), City of Los Angeles Source Reduction and Recycling Plan (CiSRRE), Ordinance No. 171,687 and the Framework Element of the General Plan. The CiSWMPP, adopted in November 1994, is the City's long-range policy plan that provides direction for solid waste management and serves as an umbrella document for the CiSRRE. Together, the CiSWMPP and CiSRRE specify goals, objectives, and programs for achieving AB 939. The General Plan Framework Element supports AB 939 and its goals and addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs. Finally, Ordinance No. 171,687 (the "Space Allocation Ordinance") requires the provision of an adequate recycling area or room for collecting and loading recyclable materials for all new construction projects, multi-family residential projects of four or more units where the addition of floor area is 25 percent or more, and other development projects where the addition of floor area is 30 percent or more. The Project would provide clearly marked, durable, source sorted recycling bins throughout the Project Site to facilitate recycling in accordance with Ordinance No. 171,687. The Project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts to regulations related to solid waste would be less than significant and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. Mandatory Findings Of Significance.

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|----|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. | Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. | Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Response a:

Based on the analysis contained in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. These impacts would be less than significant, and no further analysis of these issues is required.

Response b:

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.

Response c:

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
Sarah Molina Pearson	City Planning Associate	(213)473-9983	2-11-2016
