



## 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

CENTRAL CITY COMMUNITY PLAN AREA

## Spring Street Hotel

Case No. ENV-2015-2356-EIR

THIS DOCUMENT COMPRISES THE INITIAL STUDY ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

**Location:** 631, 633, and 635 S. Spring Street, Los Angeles, CA 90028

**Council District:** 14 – Jose Huizar

**Project Description:** The Project would involve the demolition of the existing surface parking lot and restaurant building and construction of a hotel with approximately 105,841 square feet of floor area, including: 176 hotel rooms; 6,090 square feet of restaurant space; 3,310 square feet of bar space; 1,570 square feet of retail space; and 1,250 square feet of conference space. The Project would be up to approximately 28 stories high (plus a basement level), reaching a maximum height of approximately 325 feet.

In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

- (1) Pursuant to LAMC Section 14.5.7, a Transfer of Floor Area Rights for a maximum of 49,999 square feet of floor area;
- (2) Pursuant to LAMC Section 16.05.C.1(b), a Site Plan Review for the construction of a maximum of 176 hotel guest rooms;
- (3) Pursuant to LAMC Section 12.27, a Variance to permit offsite parking for the hotel guest rooms in the Central City area;
- (4) Pursuant to LAMC Section 12.27, a Variance to permit offsite parking for the commercial uses within 1,500 feet of the Project Site with a lease in lieu of covenant;
- (5) Pursuant to LAMC Section 12.27, a Variance to permit alternative locations for required bicycle parking;
- (6) Pursuant to LAMC Section 12.24.W.1, a Master Conditional Use Permit for onsite sale and consumption of a full line of alcoholic beverages at specific locations within the hotel;
- (7) Demolition, grading, excavation, and building permits; and
- (8) Other permits, ministerial or discretionary, may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, and installation and hookup approvals for public utilities and related permits.

**APPLICANT:**

Lizard in Los Angeles, LLC  
14 Wall Street, Suite 2000  
New York, New York 10005

**PREPARED BY:**

EcoTierra Consulting, Inc.  
555 W. 5<sup>th</sup> Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90013

**ON BEHALF OF:**

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

October 2015



**Spring Street Hotel**  
**631, 633, AND 635 S. SPRING STREET**

**INITIAL STUDY**

PREPARED FOR:  
The City of Los Angeles  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012-2601

APPLICANT:  
Lizard in Los Angeles, LLC

PREPARED BY:  
EcoTierra Consulting, Inc.  
555 W. 5<sup>th</sup> Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90013

**October 2015**



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# I. INTRODUCTION

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## 1. INTRODUCTION

The subject of this Initial Study is the proposed Spring Street Hotel Project (the “Project”), an approximately 105,841-square-foot mixed-use hotel with a restaurant, pool deck and bar, retail space, and ancillary hotel facilities. The Project would involve the demolition of the existing surface parking lot and restaurant building and construction of an up to 28-story building with approximately 105,841 square feet of floor area,<sup>1</sup> which includes 176 hotel rooms; 6,090 square feet of restaurant space; 3,310 square feet of rooftop bar space; 1,570 square feet of retail space; and 1,250 square feet of conference space. The Project is located within the Downtown area of the City of Los Angeles. The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

## 2. PROJECT INFORMATION

**Project Title:** Spring Street Hotel

**Project Applicant:** Lizard in Los Angeles, LLC  
14 Wall Street, Suite 2000  
New York, New York 10005

**Project Location:** 631, 633, and 635 S. Spring Street, Los Angeles, CA 90014

**Lead Agency:** City of Los Angeles Department of City Planning  
200 N. Spring St., Room 750  
Los Angeles, CA 90012

## 3. ORGANIZATION OF THE INITIAL STUDY

This Draft Initial Study is organized into the following six sections:

**Introduction:** This Section provides introductory information such as the project title, the Project Applicant, and the designated Lead Agency for the Project.

**Project Description:** This Section provides a detailed description of the Project including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

**Initial Study Checklist:** This Section contains the completed IS Checklist showing the significance level under each environmental impact category.

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<sup>1</sup> Floor area numbers do not include the square footage for the outdoor restaurant and terrace, guest room balconies, and uncovered outdoor portion of the roof bar, which are not considered to be “floor area” per the Los Angeles Municipal Code Section 12.03.

**Environmental Impact Analysis:** This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

**Preparers of the Initial Study:** This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

**Acronyms and Abbreviations:** This Section a list of commonly used acronyms and abbreviations.

## II. PROJECT DESCRIPTION

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### 1. PROJECT APPLICANT

The Applicant for the Project is Lizard in Los Angeles, LLC, at 14 Wall Street, Suite 2000, New York, New York, 10005 (the “Applicant”).

### 2. PROJECT LOCATION

#### A. Project Site

The Project is located at 631, 633, and 635 S. Spring Street in Los Angeles, 90014 (the “Project Site”). The size of the Project Site is approximately 9,307 square feet (0.2 acre), and is located approximately mid-block between 6<sup>th</sup> Street and 7<sup>th</sup> Street, in the Downtown area of the City of Los Angeles (the “City”) (see Figure II-1, Regional Vicinity and Project Location). The Project Site is associated with Assessor Parcel Number 5144002012.

### 3. EXISTING LAND USES

#### A. Land Use Plans/Zoning

The Project Site has a General Plan land use designation of Regional Center Commercial, as set forth in the Central City Community Plan. The Central City Community Plan identifies the Project Site within the Historic Core District. The Project Site is also within the City Center Redevelopment Project area. The Project site lies within the boundaries of the historic Spring Street Financial District and directly abuts the historic Broadway Theater and Commercial District. The Project Site is zoned C5-4D (Commercial – Height District 4), as set forth in the Los Angeles Planning and Zoning Code.

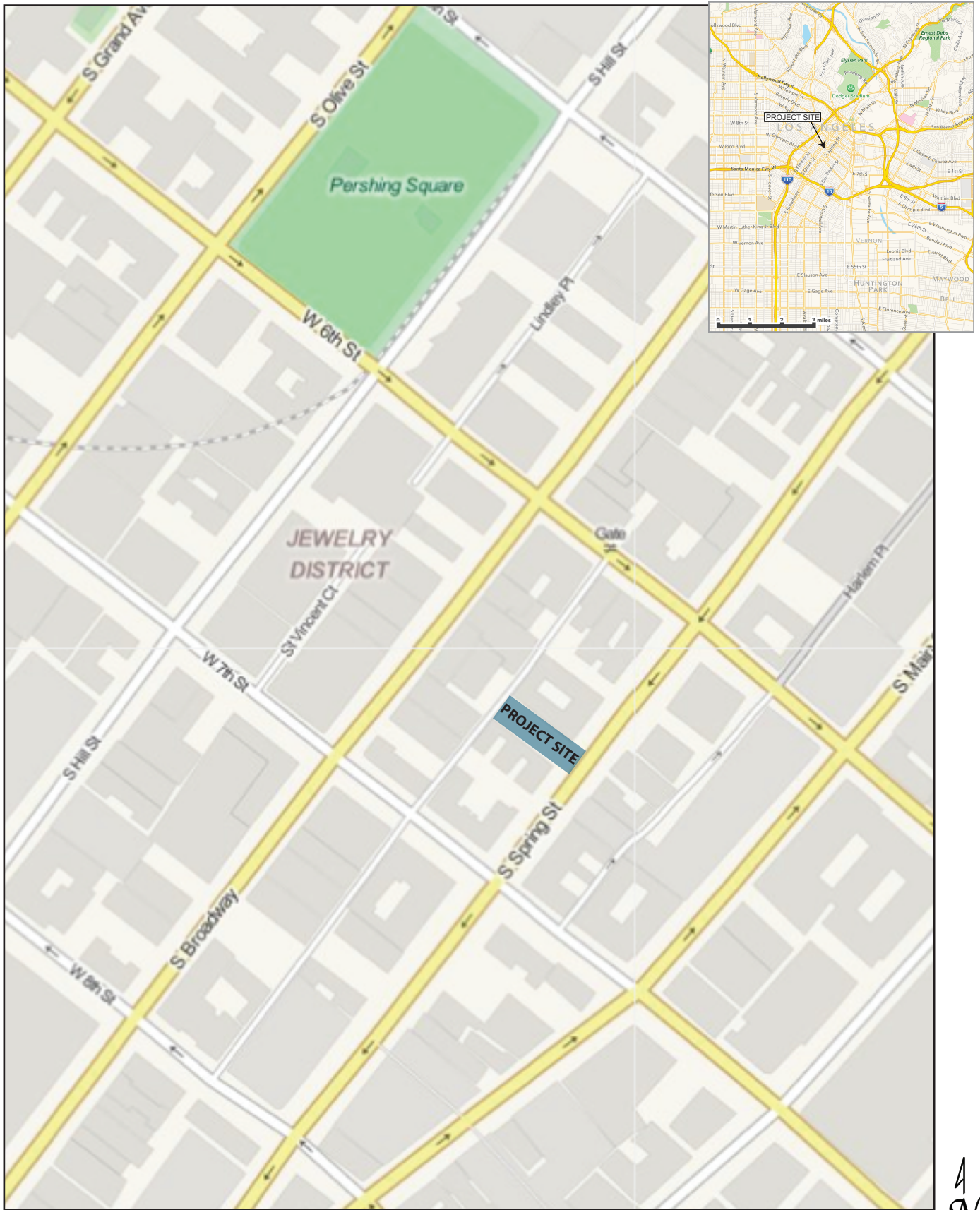
#### B. Existing Land Uses

The Project Site currently consists of a public automated surface parking lot, “Joe’s Auto Parks,” and an approximately 600-square-foot restaurant.

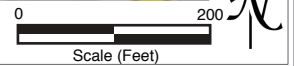
#### C. Surrounding Land Uses

The Project Site is relatively flat and is surrounded by dense urban development that characterizes Downtown Los Angeles. A mix of residential, office, and retail land uses dominate the area. Numerous historic buildings are adjacent to and in the vicinity of the Project Site.

To the east of the Project Site, across Spring Street, there are office, residential, and restaurant land uses. To the south of the Project Site is the 12-story (approximately 150 feet) Spring Tower Lofts mixed-use residential building. Abutting the Project Site to the west is a public alley, and the historic Palace Theatre (fronting Broadway) is located to the west of the alley. There is an approximately 150-foot tall retail and residential building to the north, the Premiere Towers.



■ Project Site  
Source: Mapquest, September 2014.



A bikeway runs along the length of the western side of S. Spring Street, on the same side of the street as the Project Site. It is painted green and distinguished from the vehicle travel lanes. S. Spring Street is a one-way southbound street that is classified as a secondary roadway by the City.

Along Spring Street and throughout the surrounding area, office, retail, and residential buildings of a variety of ages, sizes, and architectural styles dominate the landscape.

#### **4. PROJECT CHARACTERISTICS**

The Project would involve the demolition of the existing surface parking lot and restaurant building and construction of a building with approximately 105,841 square feet of floor area, which includes: 176 hotel rooms; 6,090 square feet of restaurant space; 3,310 square feet of bar space; 1,570 square feet of retail space; and 1,250 square feet of conference space. The Project would be up to approximately 28 stories high (plus a basement level), reaching a maximum height of approximately 325 feet. The building concept is illustrated in Figure II-2, Project Concept Plot Plan.

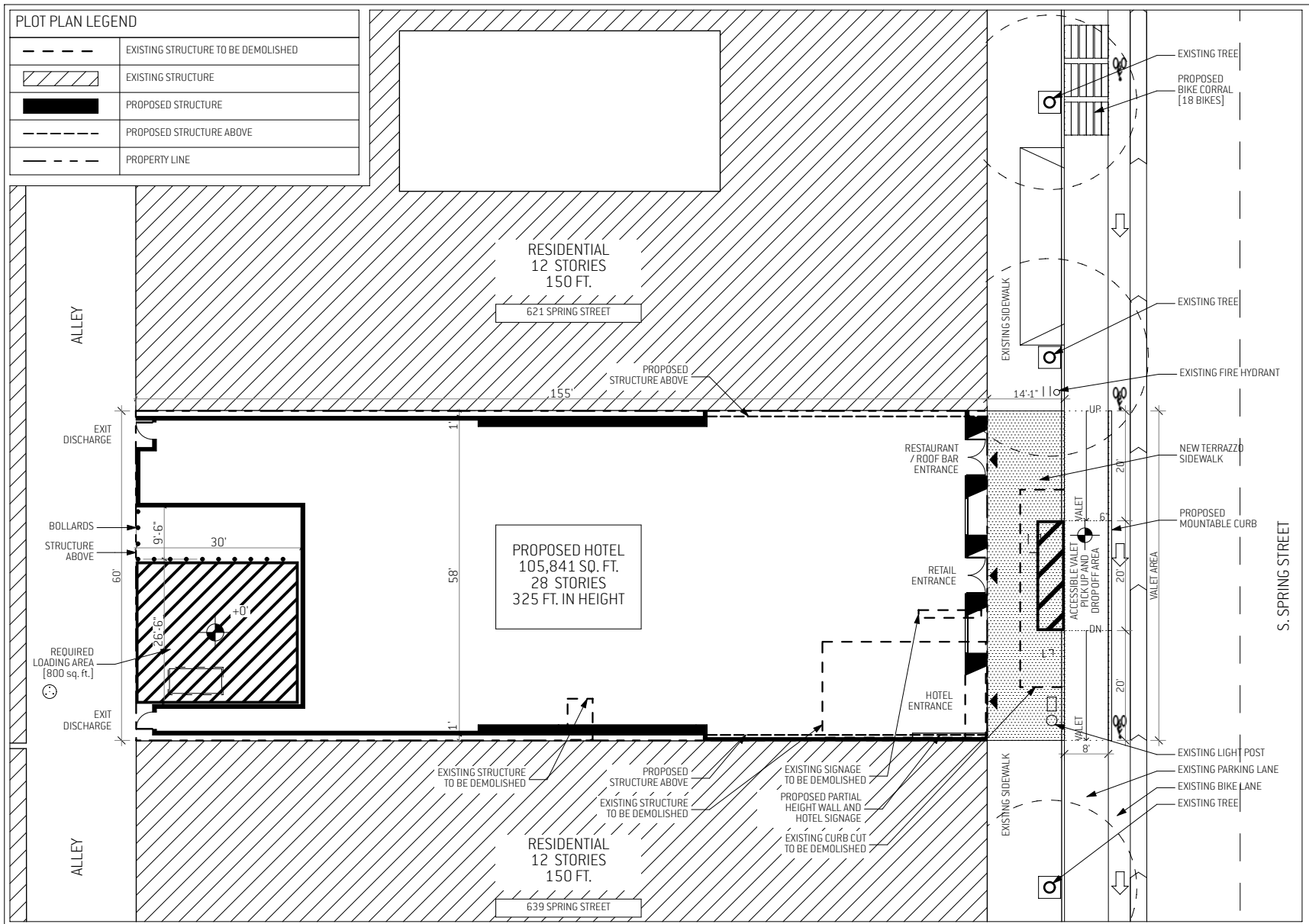
#### **5. ACCESS AND PARKING**

Visitors would access the Project via S. Spring Street. The Project would provide the required 53 vehicle parking spaces required by the Los Angeles Municipal Code (various sections of LAMC 12.21.A.4) in an off-site parking lot. Valet service would be provided at the curb, and all of the visiting vehicles would be parked at an off-site parking lot located at 530 S. Spring Street.

Eighteen long-term bicycle parking spaces would be provided on the Project Site and 18 short-term bicycle parking spaces would be provided in an outdoor proposed bicycle corral located in the public right-of-way in front of the adjacent property at 621 S. Spring Street. This corral would require removal of one on-street parking space.

#### **6. CONSTRUCTION**

The Project would be constructed over approximately 24 months. Construction activities would include the demolition of the existing parking lot and structure, excavation, and building construction. Demolition activities are anticipated to start in the third quarter of 2016, and completion of the building construction is anticipated to be completed in the third quarter of 2018.



Source: Adam Sokol Architecture Practice pllc, June 2015.

## 7. DISCRETIONARY ACTIONS AND APPROVALS

The City of Los Angeles, Department of City Planning is the lead agency for the Project. In order to permit development of the Project, the City may require approval of one or more of the following discretionary actions:

- (1) Pursuant to LAMC Section 14.5.7, a Transfer of Floor Area Rights (TFAR) for a maximum of 49,999 square feet of floor area;
- (2) Pursuant to LAMC Section 16.05.C.1(b), a Site Plan Review for the construction of a maximum of 176 hotel guest rooms;
- (3) Pursuant to LAMC Section 12.27, a Variance to permit offsite parking for the hotel guest rooms in the Central City area;
- (4) Pursuant to LAMC Section 12.27, a Variance to permit offsite parking for the commercial uses within 1,500 feet of the Project Site with a lease in lieu of covenant;
- (5) Pursuant to LAMC Section 12.27, a Variance to permit alternative locations for required bicycle parking;
- (6) Pursuant to LAMC Section 12.24.W.1, a Master Conditional Use Permit for onsite sale and consumption of a full line of alcoholic beverages at the following locations within the hotel;
  - a. Hotel lounge and bar located on the lower level;
  - b. Restaurant located on the 3<sup>rd</sup> and 4<sup>th</sup> floors with an outdoor dining terrace on the 4<sup>th</sup> floor;
  - c. Cinema screening room located on the 3<sup>rd</sup> floor for hotel guests only;
  - d. Indoor and outdoor hotel bar located on the 25<sup>th</sup> and 26<sup>th</sup> floors;
  - e. Pool deck located on the 27<sup>th</sup> floor;
  - f. In-room alcohol access cabinets within the 176 hotel rooms
- (7) Demolition, grading, excavation, and building permits; and
- (8) Other permits, ministerial or discretionary, may be necessary in order to execute and implement the project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, permits for driveway curb cuts, storm water discharge permits, and installation and hookup approvals for public utilities and related permits.

Federal, state, and regional agencies that may have jurisdiction over some aspect the project include, but are not limited to:

- Regional Water Quality Board; and
- South Coast Air Quality Management District.



**CITY OF LOS ANGELES**  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
CALIFORNIA ENVIRONMENTAL QUALITY ACT

**LEAD CITY AGENCY:**

City of Los Angeles, Department of City Planning

**COUNCIL DISTRICT:**

CD 14 – Jose Huizar

**PROJECT TITLE:**

Spring Street Hotel

**ENVIRONMENTAL CASE:**

ENV-2015-2356-EIR

**CASE NO.**

TBD

**PROJECT LOCATION:** 631, 633, and 635 S. Spring Street**PROJECT DESCRIPTION:** See Section II, Project Description.**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY**Lizard in Los Angeles, LLC  
14 Wall Street, Suite 2000  
New York, New York 10005**FINDING:**

The Department of City Planning of the City of Los Angeles finds that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

**NAME OF PERSON PREPARING FORM**

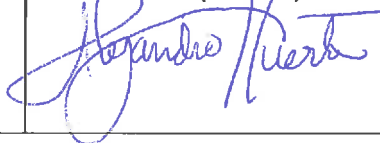
Alejandro Huerta

**TITLE**

Planning Assistant

**TELEPHONE NUMBER**

(213) 978-1454

**ADDRESS**200 North Spring Street  
Major Projects & EIR, Room 750  
Los Angeles, CA 90012**SIGNATURE (Official)****DATE**

September 17, 2015

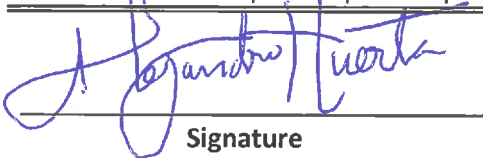
**CITY OF LOS ANGELES**  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**  
**INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)**

<b>LEAD CITY AGENCY:</b> City of Los Angeles	<b>COUNCIL DISTRICT:</b> CD 14 – Jose Huizar	<b>DATE:</b> September 17, 2015
<b>RESPONSIBLE AGENCIES:</b> Department of City Planning		
<b>ENVIRONMENTAL CASE:</b> ENV-2015-2356-EIR	<b>RELATED CASES:</b>	
<b>PREVIOUS ACTIONS CASE NO.</b> <b>None</b>	<input type="checkbox"/> DOES have significant changes from previous actions. <input checked="" type="checkbox"/> DOES NOT have significant changes from previous actions.	
<b>PROJECT DESCRIPTION:</b> See Section II, Project Description.		
<b>ENV PROJECT DESCRIPTION:</b> See Section II, Project Description.		
<b>ENVIRONMENTAL SETTING:</b> See Section II, Project Description.		
<b>PROJECT LOCATION:</b> 631, 633, and 635 S. Spring Street		
<b>COMMUNITY PLAN AREA:</b> Central City <b>STATUS:</b> <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed	<input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan	<b>AREA PLANNING COMMISSION:</b> Central  <b>CERTIFIED NEIGHBORHOOD COUNCIL:</b> Downtown Los Angeles
<b>EXISTING ZONING:</b> C5-4D	<b>MAX DENSITY ZONING:</b> Unlimited	<b>LA River Adjacent:</b> No
<b>GENERAL PLAN LAND USE:</b> Regional Center Commercial	<b>MAX. DENSITY PLAN:</b> Unlimited	

**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.

  
Signature

Planning Assistant  
Title

(213) 978-1454  
Phone

**Evaluation of Environmental Impacts:**

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

## 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 type="checkbox"/> AGRICULTURE AND FOREST RESOURCES <input checked="" type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input checked="" type="checkbox"/> CULTURAL RESOURCES <input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> GREENHOUSE GAS EMISSIONS <input type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input checked="" type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input checked="" type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input checked="" type="checkbox"/> TRANSPORTATION/CIRCULATION <input checked="" type="checkbox"/> UTILITIES <input checked="" type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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### INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

#### *Background*

**APPLICANT NAME:**

Lizard in Los Angeles, LLC

**APPLICANT ADDRESS:**

14 Wall Street, Suite 2000  
New York, New York 10005

**AGENCY REQUIRING CHECKLIST:**

Department of City Planning

**PROPOSAL NAME (If Applicable):**

Spring Street Hotel

**PHONE NUMBER:**

(646) 368-8856

**DATE SUBMITTED:**

September 17, 2015

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN SECTION IV OF THIS INITIAL STUDY, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN SECTION IV FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.</b></p>					
<b>I. AESTHETICS</b>					
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, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-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"/>
<b>II. AGRICULTURE AND FOREST RESOURCES</b>					
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(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"/>
<b>III. AIR QUALITY</b>					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>IV. BIOLOGICAL RESOURCES</b>					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<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"/>
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 (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
<b>V. CULTURAL RESOURCES</b>					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VI. GEOLOGY AND SOILS</b>					
a.	EXPOSURE OF 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii.	STRONG SEISMIC GROUND SHAKING?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv.	LANDSLIDES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c.	BE LOCATED ON A GEOLOGIC UNIT 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"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>VII. GREENHOUSE GAS EMISSIONS</b>					
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS</b>					
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>IX. HYDROLOGY AND WATER QUALITY</b>					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?				
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN 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 checked="" type="checkbox"/>	<input type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>X. LAND USE AND PLANNING</b>					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<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"/>
<b>XI. MINERAL RESOURCES</b>					
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"/>
<b>XII. NOISE</b>					
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUND BORNE VIBRATION OR GROUND BORNE 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"/>
<b>XIII. POPULATION AND HOUSING</b>					
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 checked="" 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"/>	<input checked="" type="checkbox"/>
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIV. PUBLIC SERVICES</b>					
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	PARKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	OTHER PUBLIC FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XV. RECREATION</b>					
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XVI. TRANSPORTATION/CIRCULATION</b>					
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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G.,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?				
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>XVII. UTILITIES</b>					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE</b>					
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology – Seismic Hazard Maps and reports are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the Project Site, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The Project as identified in the project description may cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report shall be prepared to address all potential adverse impacts on the environment.

### ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the Major Projects & EIR Section, Room 750, City Hall.

For City information, addresses, and phone numbers: visit the City's website at <http://www.lacity.org>; City Planning- and Zoning Information Mapping Automated System (ZIMAS) [cityplanning.lacity.org/](http://cityplanning.lacity.org/) or Major Projects & EIR Section, City Hall, 200 N Spring Street, Room 750. Seismic Hazard Maps – <http://gmw.consrv.ca.gov/shmp/> Engineering/Infrastructure/Topographic Maps/Parcel Information – <http://boemaps.eng.ci.la.ca.us/index0.1htm> or City's main website under the heading "Navigate LA."

<b>PREPARED BY:</b> Alejandro Huerta	<b>TITLE:</b> Planning Assistant	<b>TELEPHONE NO.:</b> (213) 978-1454	<b>DATE:</b> September 17, 2015
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## IV. ENVIRONMENTAL IMPACT ANALYSIS

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### INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist. The thresholds of significance are based on the practices of the City of Los Angeles, the *L.A. CEQA Thresholds Guide 2006*, the State CEQA Guidelines, and other sources as noted.

#### 1. AESTHETICS

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

**No Impact.** For the purpose of this Initial Study, a significant impact may occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide 2006* ("*L.A. CEQA Thresholds Guide*"), the determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

The Project Site is located in the Central City community of the City of Los Angeles. The existing visual character of the surrounding locale is typical of a dense urban area with multi-story buildings along Spring Street, 6<sup>th</sup> and 7<sup>th</sup> Streets, as well as Broadway and Main Street to the west and east, respectively. Views in the vicinity of the Project Site are largely constrained by tall structures on adjacent parcels, and the area's relatively flat topography, creating an urban canyon effect. At the street level, views are also limited and the Project Site does not contain nor provide views of any unique scenic vistas, as it is a surface parking lot sandwiched between buildings.

There are no significant natural features (such as trees, topography, rock outcroppings, bodies of water, or substantial stands of native vegetation) on the Project Site that could be considered scenic. In addition, there are no aesthetically significant man-made architectural structures, monuments, or gardens on the Project Site. However, there are two murals on the walls of the adjacent buildings directly to the north and south of the Project Site. The Project has been designed to incorporate the murals and they would be preserved upon completion of the Project. Therefore, no impacts to scenic vistas would occur and further analysis of this issue is not required.

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

**No Impact.** Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur only if a project affected views from a designated scenic highway. There are no scenic highways in the vicinity of the Project Site.<sup>1</sup> As the Project is not located along or within any scenic vistas or viewsheds of a scenic highway, there would be no impacts to scenic resources. Therefore, no impact would occur and further analysis of this issue is not required.

**c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact would occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant aesthetic impact shall be made considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and a one-story restaurant building in a dense urban area within a historic district. As such, the Project could change the visual character of the Project Site and its surroundings through the introduction of new visual elements. This potential impact shall be evaluated in an EIR.

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<sup>1</sup> *California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, accessed: January 23, 2015; and City of Los Angeles, Department of City Planning, Transportation Element of the General Plan, Scenic Highways, Map E, September, 1999.*

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

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project introduces new sources of light or glare on or from the Project Site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant nighttime illumination impact shall be made considering the following factors:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

### **Light**

The Project Site is located in a well-lit urban area where there are high levels of ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows), automobile headlights and brightly lighted commercial land uses. As Spring Street is characterized by pedestrian activities and high-rise residences, the level of ambient lighting is high 24 hours a day. Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, so that light emanating from any one source contributes to, rather than is solely responsible for, lighting impacts on a particular use. The downtown area contains a number of skyscrapers continuously brightly lit to create a vibrant and dynamic skyline. As development surrounding the Project Site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any noticeable effect. The Project, by introducing new sources of light on a site with only a surface parking lot and small building, could have the potential to alter lighting patterns in the area. This potential impact shall be evaluated in an EIR.

### **Glare**

Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but increases the ambient heat reflectivity in a given area. The proposed Project would be built on a property where only a small building (about 600 square feet) currently exists; therefore, the introduction of a larger building would increase the amount of building surfaces that could be a source of reflection. As such, this potential impact shall be evaluated in an EIR.

### **Shade and Shadows**

The issue of shade and shadow pertains to the effect of shadows cast upon adjacent areas by proposed structures. The effects of shading are site-specific. As described in the *L.A. CEQA Thresholds Guide*,

shadow effects are dependent upon several factors, including the local topography, the height and bulk of the project's structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered to be sensitive because sunlight is important to function, physical comfort, or commerce.

The *L.A. CEQA Thresholds Guide* states that a project would have a significant impact if it would cast shadow on shade-sensitive land uses for more than three hours between the hours of 9 AM and 3 PM (between late October and early April), or for more than four hours between the hours of 9 AM and 5 PM (between early April and late October).

The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and one-story restaurant. The proposed building would, therefore, introduce new shadows to the Project vicinity that could cast shadow on shade-sensitive land uses. As such, this potential impact shall be evaluated in an EIR.

## 2. AGRICULTURE AND FOREST RESOURCES

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

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, 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 Project Site is developed with a paved surface parking lot and a small structure, and is located in the dense urban area of Downtown Los Angeles. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.<sup>2</sup> Therefore, no impact would occur and further analysis of this issue is not required.

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<sup>2</sup> *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2006, Map, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf>, accessed October 16, 2014.*

**b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use.

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned C5-4D (Commercial - Height District 4) and has a land use designation of Regional Center Commercial in the Central City Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.<sup>3</sup> Therefore, no impact would occur and further analysis of this issue is not required.

**c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the conversion of land zoned for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code). The Zoning Code includes development standards for the various districts in the City of Los Angeles. The Project Site is currently zoned C5-4D and has a land use designation of Regional Center Commercial in the Central City Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use.

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<sup>3</sup> California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland in California, 2006, California Division of Land Resource Protection, website: [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006\\_wallsize.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf), accessed October 16, 2014.

The Project Site is developed with a paved surface parking lot and a small structure, and is located in the dense urban area of Downtown Los Angeles. No forestland exists on or in the vicinity of the Project Site. Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project results in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

The Project Site is developed with a paved surface parking lot and a small 1,000-square-foot structure, and is located in the dense urban area of Downtown Los Angeles. Neither the Project Site, nor nearby properties, are currently utilized for agriculture or forestry and, as discussed above (Section 2(a)), the Project Site is not classified in any "Farmland" category designated by the State of California. Therefore, no impact would occur and further analysis of this issue is not required.

### 3. AIR QUALITY

- a) **Would the project conflict with or obstruct implementation of the SCAQMD or congestion management plan?**

**Potentially Significant Impact.** A significant impact may occur if the project is not consistent with the applicable air quality plan or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the Air Quality Management Plan (AQMP) that is prepared by the South Coast Air Management District (SCAQMD). Construction and operation of the Project could result in an increase in emissions by introducing a new land use and intensity of development to the Project Site. These emissions may conflict with implementation of the AQMP. As such, this potential impact shall be evaluated in an EIR.

- b) **Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Potentially Significant Impact.** A project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Air pollutants would be emitted as a result of demolition, grading, and the construction of the Project. In addition, air pollutants would be emitted as a result of automobiles travelling to and from the Project Site during operation. Because the Project introduces a new intensity of development to the Project Site, the resulting emissions could violate air quality standards set by the SCAQMD. Therefore, this potential impact shall be evaluated in an EIR.

- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

**Potentially Significant Impact.** A significant impact may occur if a project would add a considerable cumulative contribution to federal or state non-attainment pollutant. The South Coast Air Basin, wherein the Project Site is located, is currently in nonattainment for ozone, nitrogen dioxide, and particulate matter. The construction and operation of a new intensity of development from the Project could emit criteria air pollutants that could potentially result in a cumulatively considerable net increase of criteria air pollutants. This potential impact shall be evaluated in an EIR.

- d) **Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** A significant impact may occur where a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors. The SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site causes localized pollutant levels to exceed state ambient air quality standards at sensitive receptors or where a project causes an increase in local contaminants during construction and operation of the project. A significant impact may also occur where a project would cause concentrations at sensitive receptors located near congested intersections to exceed the national or state ambient air quality standards and the traffic generated by the project contributes to the concentrations. Sensitive receptors in close proximity to the Project Site include, but are not limited to,<sup>4</sup> the residents along Spring Street. The construction and operation of a new intensity of development from the Project could emit substantial concentrations of air pollutants near those sensitive receptors. This potential impact shall be evaluated in an EIR.

- e) **Would the project create objectionable odors affecting a substantial number of people?**

**Less-Than-Significant Impact.** A significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of a hotel, which is a land use that is not typically associated with odor complaints according to the SCAQMD. As the Project involves no elements related to industrial or other odor-generating land uses, no objectionable odors are anticipated. Therefore, the potential impacts associated with objectionable odors would be less than significant and no mitigation measures are required.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. The Project would use typical construction techniques, and the odors would be typical of

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<sup>4</sup> Additional sensitive receptors may be identified during the preparation of the EIR.

most construction sites and temporary and intermittent in nature. Therefore, construction of the Project would result in less-than-significant impacts related to odors and further analysis of this issue is not required.

#### **4. BIOLOGICAL RESOURCES**

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

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is developed with a paved surface parking lot and a small structure, and is located in the dense urban area of Downtown Los Angeles. The Project Site does not contain any habitat capable of sustaining 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. In addition, there are no known locally designated natural communities at the Project Site or in the project vicinity. Therefore, the Project would have no impact on sensitive biological species or habitat and further analysis of this issue is not required.

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

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- The alteration of an existing wetland habitat; or

- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is developed with a paved surface parking lot and a small structure, and is located in the dense urban area of Downtown Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. Therefore, the Project would have no impact to riparian habitat or other sensitive natural communities and further analysis of this issue is not required.

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

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat.

The Project Site is developed in an urbanized area with a paved surface parking lot and a small structure. Furthermore, review of the National Wetlands Inventory identified no protected wetlands in the project area.<sup>5</sup> Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above) and no impacts to riparian or wetland habitats would occur and further analysis of this issue is not required.

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

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

As discussed in Section 4(a), the Project Site is located in an urban area. Due to the urban surroundings, there are no wildlife corridors or native wildlife nursery sites in the project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species. No impact would occur and further analysis of this issue is not required.

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

**No Impact.** A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources. For the purpose of this Initial Study, a significant impact could occur if the project would be inconsistent with local regulations pertaining to biological resources, including, but not limited to, the City of Los Angeles Protected Tree Ordinance No. 177,404. The Project

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<sup>5</sup> *National Wetlands Inventory, U.S. Fish & Wildlife Service, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed October 16, 2014.*

Site is not currently planted with trees or other vegetation. The Project Site is developed with a paved surface parking lot and a small structure. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources. No impact would occur and further analysis of this issue is not required.

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

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited. The highly urbanized Project Site and vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur and further analysis of this issue is not required.

## **5. CULTURAL RESOURCES**

**a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

**Potentially Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the State CEQA Guidelines defines a historical resource 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.

The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on a significant resource if it would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines when one or more of the following occurs:

- Demolition of a significant resource that does not maintain the integrity and significance of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;

- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings ("Standards"); or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

A significant impact would occur if a project were to adversely affect an historical resource meeting one of the above definitions. Because the Project Site is in the historic Spring Street Financial District and abuts the Broadway Theater and Commercial District, the Project has the potential to affect a historic resource. The Project will be evaluated in an EIR to determine if it would cause a substantial material change to the integrity and significance of historical resources or their contributing setting within the Project vicinity.

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

**Potentially Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the Project Site. The Project Site is developed with a surface parking area and a building. The Project would include the excavation of soil to accommodate a basement level. The proposed excavation could potentially disturb previously unknown archaeological resources. Therefore, this potential impact shall be evaluated in an EIR.

**c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Potentially Significant Impact.** A significant impact could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is developed with a surface parking area and a building, and there are no visible unique geologic features onsite. However, the Project would include the excavation of soil to accommodate a basement level which could potentially disturb previously unknown paleontological resources or unique geologic features. Therefore, this potential impact shall be evaluated in an EIR.

**d) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

**Potentially Significant Impact.** A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site is developed with a surface parking area and a building. The Project would include the excavation of soil to accommodate a basement level. The proposed excavation could potentially disturb human remains. This potential impact shall be evaluated in an EIR.

## 6. GEOLOGY AND SOILS

- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

The Project Site is located in the seismically active region of southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. However, there are no mapped active or potentially active faults identified by the State, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map<sup>6</sup> known to be present on or beneath the Project Site. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. The distance to the nearest active fault to the site, the Puente Hills Blind Thrust, is approximately 1 kilometer or 0.62 miles.<sup>7</sup> The potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. Additionally, the City of Los Angeles Building Code, with which the Proposed Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk. Therefore, impacts related to ground rupture from known earthquake faults would be less than significant and further analysis of this issue is not required.

(ii) **Strong seismic ground shaking?**

**Potentially Significant Impact.** 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. As the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Thus, in order to be considered a significant geologic impact under the *L.A. CEQA Thresholds Guide*, the project must exceed the typical risk of hazard for the region. An impact would be considered significant if a project represents an increased risk to public safety or destruction of property by exposing people,

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<sup>6</sup> *Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, Earthquake Zones of Required Investigation, Official Map released November 6, 2014* [http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood\\_EZRIM/Hollywood\\_EZRIM.pdf](http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf), accessed November 20, 2014.

<sup>7</sup> *City of Los Angeles Department of Planning, Zoning Information and Map Access System, 633 S. Spring Street, <http://zimas.lacity.org>*, accessed November 18, 2014.

property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

The Project Site is within the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. Seismic ground shaking could damage the buildings, parking areas, and utility infrastructure. The Project Site is located approximately 0.62 mile from the Puente Hills Blind Thrust Fault,<sup>8</sup> and nearby many other faults on a regional level. Therefore, there is the potential for the Project to experience strong seismic ground shaking. This potential impact shall be evaluated in an EIR.

**(iii) Seismic-related ground failure, including liquefaction?**

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a Project Site is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project located within a liquefaction zone.

The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and the grain size, relative density, and confining pressures of the soil at the site.

According to the State of California Geologic Survey Seismic Hazard Zone, Hollywood Quadrangle Map (1999),<sup>9</sup> Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, the City of Los Angeles Safety Element<sup>10</sup> and City of Los Angeles Department of Planning Zoning Information and Map Access System (ZIMAS) Parcel Profile Report<sup>11</sup> the Project Site is not located within an area identified as having potential for liquefaction.

Furthermore, the site was explored between October 9, 2014, and October 10, 2014, by excavating two exploratory borings. The exploratory borings varied between 80 and 130 feet in depth below the existing site grade. Groundwater was encountered at a depth of 115 ½ feet below the existing site grade in Boring Number 1. The historically highest groundwater level was established by review of California Geological Survey Seismic Hazard Zone Report of the Hollywood Quadrangle which indicates that the historically highest groundwater level is on the order of 70 feet below the existing site grade. Based on the dense nature of the underlying soils, and the depth to historic highest groundwater level,

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<sup>8</sup> City of Los Angeles Department of Planning, Zoning Information and Map Access System (ZIMAS), 633 S. Spring Street, website: <http://zimas.lacity.org>, accessed: November 18, 2014.

<sup>9</sup> Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, Earthquake Zones of Required Investigation, Official Map of Seismic Hazard Zones released March 25, 1999 [http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood\\_EZRIM/Hollywood\\_EZRIM.pdf](http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf), accessed November 20, 2014.

<sup>10</sup> City of Los Angeles Safety Element, Exhibit B: Areas Susceptible to Liquefaction in the City of Los Angeles, October 1993.

<sup>11</sup> City of Los Angeles Department of Planning, Zoning Information and Map Access System, 633 S. Spring Street, <http://zimas.lacity.org>, accessed November 18, 2014.

the potential for liquefaction occurring at the site is considered to be remote.<sup>12</sup> Therefore, impacts with respect to potential liquefaction would be less than significant and further analysis of this issue is not required.

**(iv) Landslides?**

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project Site and surrounding vicinity are relatively flat and are not located adjacent to any hillsides or steep slopes. Moreover, the Project Site is located in an area where there are no known landslides, nor is the site in the path of any known or potential landslides.<sup>13,14</sup> Therefore, no impact would occur and further analysis of this issue is not required.

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

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impact if it would:

- Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

The Project Site is currently improved with a paved parking lot and a one-story restaurant. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, grading and excavation would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in a Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

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<sup>12</sup> Geotechnologies, Inc., *Geotechnical Engineering Exploration Proposed Mixed-Use Development 633 S. Spring Street, Los Angeles, California, November 11, 2014.*

<sup>13</sup> CA Landslide Hazard Zones - Landslide Hazard Zones, website: [http://www.arcgis.com/home/webmap/viewer.html?url=http://services.arcgis.com/jDGuO8tYggdCCnUJ/ArcGIS/rest/services/Landslide\\_Hazard\\_Zones/FeatureServer/0&source=sd](http://www.arcgis.com/home/webmap/viewer.html?url=http://services.arcgis.com/jDGuO8tYggdCCnUJ/ArcGIS/rest/services/Landslide_Hazard_Zones/FeatureServer/0&source=sd), accessed: July 29, 2015.

<sup>14</sup> *Landslide Inventory Map of the Hollywood Quadrangle California Geological Survey, April 2013*, website: [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/lslm/LSIM\\_Hollywood.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/lslm/LSIM_Hollywood.pdf), accessed: July 29, 2015.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project.

Therefore, impacts with respect to soil erosion would be less than significant and further analysis of this issue is not required.

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

**No Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this environmental issue, 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. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6 (a)(iii) and 6 (a)(iv), above.

There is no evidence that the Project Site is susceptible to lateral spreading or subsidence. The site is not located on or near a hillside area and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. All construction would comply with the City Building Code (LAMC Chapter IX), which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions. Therefore, there would be no impact and further analysis of this issue is not required.

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

**Less-Than-Significant Impact.** For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Expansive soils generally result from specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. The ability of clayey soil to change volume can result in uplift or cracking to foundation elements or other rigid structures, such as sidewalks or slabs, founded on these soils. According to the *Geotechnical Engineering Investigation* prepared for the Project, the onsite soil materials are in the very low expansive range.<sup>15</sup>

Though the existing 15 to 17 ½ foot thick fill materials are considered to be unsuitable for support of the proposed foundations, floor slabs, or additional fill, they would be removed as it is anticipated that excavations up to 35 feet would be required for the two proposed subterranean garage levels and foundation elements. The proposed excavation would remove the existing fill materials and expose the

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<sup>15</sup> *Geotechnologies, Inc., Geotechnical Engineering Exploration Proposed Mixed-Use Development 633 S. Spring Street, Los Angeles, California, November 11, 2014.*

underlying dense native soils. It is recommended that the proposed structure be supported on a mat foundation bearing in the underlying dense native soils.

Due to the location of the proposed structure relative to property lines, public way, and existing structures, the excavation of the proposed subterranean level would require shoring measures to provide a stable excavation.

Construction of the Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code, which include building foundation requirements appropriate to site-specific conditions. With compliance with existing regulations, implementation of all site-specific requirements identified in the *Geotechnical Engineering Investigation*,<sup>16</sup> there would be a less-than-significant impact associated with expansive soils. Therefore, no further analysis is required.

**e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, this question would apply to a project only if it was 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. The existing land uses are connected to the City's sewer system. No septic tanks or alternative disposal systems are necessary nor are they proposed. Therefore, no impact would occur and further analysis of this issue is not required.

## **7. GREENHOUSE GAS EMISSIONS**

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

**Potentially Significant Impact.** Construction and operation of the Project would generate greenhouse gas (GHG) emissions. Generally, the evaluation of an impact under CEQA requires measuring data from a project against a "threshold of significance."<sup>17</sup> Furthermore, "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."<sup>18</sup> For greenhouse gas emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact.

Section 15064.4 of the State CEQA Guidelines states the following:

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<sup>16</sup> *Ibid.*

<sup>17</sup> *CEQA Guidelines Section 15064.7.*

<sup>18</sup> *CEQA Guidelines Section 15064.7(c).*

(b) A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

According to Appendix G of the *State CEQA Guidelines*, a project could have a significant environmental impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As such, the Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) or Appendix G of the State CEQA Guidelines. The Project would increase the intensity of land uses on the Project Site from a surface parking lot with a one-story 600-square-foot building to a 28-story hotel; therefore, the Project would increase GHG emissions during construction and operation. Therefore, this increase could impact the environment. This potential impact from GHG emission will be evaluated in an EIR.

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

**Potentially Significant Impact.** A significant greenhouse gas emissions impact may occur if a project is not consistent with the AB 32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions, such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan. As discussed above, the construction and operation of the Project could generate GHG emissions, which could potentially conflict with applicable plans, policies, or regulations. This potential impact shall be evaluated in an EIR.

## 8. HAZARDS AND HAZARDOUS MATERIALS

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

**Less-Than-Significant Impact.** 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 types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other hotel developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and a less-than-significant impact would occur and further analysis of this issue is not required.

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

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, asbestos, chemicals or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

#### Construction

The *Phase I Environmental Site Assessment Report* ("Phase I ESA") revealed no evidence of recognized environmental conditions in connection with the Project Site.<sup>19</sup> However, the Phase I ESA recommends surveys for asbestos and lead-based paint. If asbestos and/or lead-based paint were found during construction, then they would be removed in compliance with applicable standards and procedures.

During construction, all asbestos-containing materials would be removed by a licensed abatement contractor in accordance with all federal, State, and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated asbestos-containing materials to acceptable levels.

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<sup>19</sup> Andersen Environmental, *Phase I Environmental Site Assessment Report Performed At 631, 633, and 635 South Spring Street, Los Angeles, California 90014 APN No.: 5144-002-012, May 9, 2013.*

With respect to lead-based paint, the contractor would comply with the OSHA Lead In Construction Standard and Cal/OSHA Construction Safety Orders, Lead Section 1532.1, Title 8, California Code of Regulations. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with lead-based paint to acceptable levels.

Mandatory compliance with applicable standards and procedures would ensure that the hazardous material impact associated with asbestos and lead-based paint during construction would be less than significant. Therefore, further analysis of this issue is not required.

### Operation

The analysis in the Phase I ESA indicated that there is no evidence of recognized environmental conditions that could pose a hazard to the public or the environment during the operation of the Project. The Project Site is not located within a methane zone or a methane buffer zone.<sup>20</sup> No hazardous gases or other materials are known to exist beneath the Project Site that could pose a risk to future Project occupants. Therefore, no impact would occur during operation of the Project. Therefore, further analysis of this issue is not required.

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

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- A project involved the creation of any health hazard or potential health hazard.

The closest school to the Project Site is the Jardin de la Infancia, a charter school within the Las Familias del Pueblo community center, located at 307 East Seventh Street, which is one-quarter mile away from the Project Site.

The construction of the Project would not emit hazardous materials with mandatory compliance with applicable federal and State standards and procedures associated with asbestos and lead-based paint. Therefore, the impact during construction would be less than significant.

The Project would not employ hazardous or acutely hazardous materials above those commonly used for maintenance and janitorial services associated with hotels. The Project would use, at most, minimal amounts of hazardous materials for routine cleaning and, therefore, would not pose any substantial risk for accident conditions involving the release of hazardous materials. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste

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<sup>20</sup> Andersen Environmental, *Phase I Environmental Site Assessment Report Performed At 631, 633, and 635 South Spring Street, Los Angeles, California 90014 APN No.: 5144-002-012, May 9, 2013.*

within one-quarter mile of an existing or proposed school and a less-than-significant impact would occur. Further analysis of this issue is not required.

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

**No Impact.** California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

During the preparation of the Phase I ESA, local and state agencies, such as environmental health departments, fire prevention bureaus, and building and planning departments were contacted to identify any current or previous reports of hazardous materials use, storage, and/or unauthorized releases that may have impacted the Project Site. Correspondence from the Los Angeles County Department of Health Services Public Health Investigations, the appropriate divisions of the Los Angeles Fire Department, the Los Angeles Regional Water Quality Control Board, the California Division of Oil, Gas, and Geothermal Resources, the South Coast Air Quality Management District, and the California Department of Toxic Substances Control indicate that there are no files for the Project Site.

The response from the Los Angeles Bureau of Sanitation (LABS) reports that there are files for industrial wastewater at the Project Site. According to the information provided, Mai Super Tacos located at 633 South Spring Street from November 2002 to April 2008 and Mai Mexican Kitchen occupying the site from January 2009 to 2013 (the date of the Phase I ESA) were permitted for the discharge of industrial wastewater from braising, deep frying, floor washing, general equipment washing, and grilling operations. Based on the oversight by the LABS, the permitted natures of the discharge, and the wastewater constituents (no hazardous materials), these permits are not expected to represent a significant environmental concern for the Project Site.<sup>21</sup>

In addition, a search of federal, state, tribal, and local databases containing known and suspected sites of environmental contamination was conducted. The Project Site was not identified in any of the databases.<sup>22</sup>

As the Project Site was not found in any of the databases compiled pursuant to Government Code Section 65962.5, no impact related to hazardous materials sites would occur.

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<sup>21</sup> *Ibid.*

<sup>22</sup> *Ibid.*

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

**No Impact.** A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The closest public airports to the Project Site are the Santa Monica Airport and the Los Angeles International Airport. However, neither of these airports is located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area.<sup>23</sup> Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur and further analysis of this issue is not required.

- g) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less-Than-Significant Impact.** According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which a project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

The Project is not located on or near an adopted emergency response or evacuation route.<sup>24</sup> The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to the Los Angeles Fire Department during review of plans as part of the building permit process.

Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and evacuation routes would be maintained during construction.

Therefore, the Project is not expected to interfere with any adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and further analysis of this issue is not required.

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<sup>23</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed: January 27, 2015.

<sup>24</sup> City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Critical Facilities & Lifeline Systems in the City of Los Angeles*, April 1995.

- h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the Project Site is located in proximity to wildland areas and poses a significant fire hazard, which could affect persons or structures in the areas in the event of a fire.

The Project Site is located in a dense urban area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Fire High Fire Hazard Severity Zone.<sup>25</sup> Therefore, no impacts from wildland fires would occur and further analysis of this issue is not required.

## **9. HYDROLOGY AND WATER QUALITY**

- a) Would the project violate any water quality standards or waste discharge requirements?**

**Potentially Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which 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 would contribute stormwater runoff to the existing drainage system, which could potentially contain water pollutants. This potential impact shall be evaluated in an EIR.

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

**Less-Than-Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would:

- Change potable water levels sufficiently to:

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<sup>25</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed: November 21, 2014.

- Reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought;
- Reduce yields of adjacent wells or well fields (public or private); or
- Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity.

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. The historically highest groundwater in the Project area is estimated to be 70 feet below the ground surface. During the borings conducted to support the Geotechnical Engineering Exploration, groundwater was not encountered during exploration to a depth of 115.5 feet. The maximum depth of excavation for the Project is approximately 35 feet.<sup>26</sup> As such, no dewatering (i.e., removal of groundwater) during construction would be necessary.

In addition, operation of the Project would not interfere with groundwater recharge. The Project Site is currently developed with a building and paved surfaces. Therefore, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. With the Project, the amount of permeable surface area would be similar to existing conditions. As such, construction and operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?**

**Potentially Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and one-story restaurant building, which could result in a change to the existing drainage pattern. Changes to the drainage pattern could temporarily create erosion or siltation on the Project Site during construction activities. This potential impact shall be evaluated in an EIR.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase**

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<sup>26</sup> Geotechnologies, Inc., *Geotechnical Engineering Exploration Proposed Mixed-Use Development 633 S. Spring Street, Los Angeles, California, November 11, 2014.*

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

**Potentially Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and one-story restaurant building, which could result in a change to the existing drainage pattern. Changes to the drainage pattern could increase the rate of runoff in a manner that could result in flooding on- or off-site. This potential impact shall be evaluated in an EIR.

**e) Would the project 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?**

**Potentially Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and a one-story restaurant building, which could contribute runoff water in excess of the capacity of the existing stormwater drainage system. This potential impact shall be evaluated in an EIR.

**f) Would the project otherwise substantially degrade water quality?**

**Potentially Significant Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project includes sources of water pollutants that would have the potential to substantially degrade water quality. The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and one-story restaurant building, which could contribute stormwater runoff water to the existing stormwater drainage system. The stormwater runoff could potentially contain water pollutants. This potential impact shall be evaluated in an EIR.

**g) Would the project 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?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if a project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood which results from a severe rainstorm with a probability of occurring approximately once every 100 years.

The Project Site is not located within a City designated Flood Hazard Zone.<sup>27</sup> Therefore, the Project would not place housing within a 100-year flood hazard area. No impact would occur and further analysis of this issue is not required.

**h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project was located within a 100-year flood zone, which would impede or redirect flood flows.

As discussed in Question 9(g), the Project Site is not in an area designated as a 100-year flood hazard area.<sup>28</sup> The Project is located in a dense urban area and would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur and further analysis of this issue is not required.

**i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**Less-Than-Significant Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

Although the Project Site vicinity is within a City-designated potential inundation area, the Project Site itself is located in an area that is designated as having a low flooding potential.<sup>29</sup> Furthermore, the Project Site is not located within an area designated by FEMA as presenting substantial flooding risks associated with a 100- or 500-year flooding event.<sup>30,31</sup> Therefore, impacts related to potential inundation from the failure of a levee or dam would be less than significant and further analysis of this issue is not required.

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<sup>27</sup> *Ibid.*

<sup>28</sup> *City of Los Angeles Department of City Planning, Parcel Profile Report, website: [www.zimas.lacity.org](http://www.zimas.lacity.org) and City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994.*

<sup>29</sup> *City of Los Angeles Department of City Planning, Safety Element of the General Plan, Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.*

<sup>30</sup> *U.S. Department of Homeland Security, Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Panel 1620F, Map Number 06037C1620F, effective date September 26, 2008.*

<sup>31</sup> *City of Los Angeles Department of City Planning, Safety Element of the General Plan, Exhibit F, 100-Year & 500-Year Flood Plains, March 1994.*

**j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a Project Site 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 Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The Project Site is located at least 12 miles from the Pacific Ocean and is not in the vicinity of any other major water bodies; therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. Furthermore, the Project Site is located in a dense urban area, where little open space exists. The Project Site is relatively flat and is not located adjacent to a hillside area. Therefore, the potential for mudflows to impact the Project Site would also be highly unlikely. Therefore, no impacts with respect to risk of loss, injury, or death by seiche, tsunami, or mudflow would occur and further analysis of this issue is not required.

## **10. LAND USE AND PLANNING**

**a) Would the project physically divide an established community?**

**No Impact.** A significant impact may occur if a project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

Physically dividing elements may include land use incompatibility caused by contrasting scale or land use.

The Project Site is located in an urbanized setting surrounded by dense urban development that characterizes Downtown Los Angeles. A mix of residential, office, and retail land uses dominate the area. Numerous historic buildings are adjacent to and in the vicinity of the Project Site, which is within the Historic Core of Downtown Los Angeles.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Since the Project would not

physically disrupt or divide the surrounding established community, no impact would occur and further analysis of this issue is not required.

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

**Potentially Significant Impact.** A significant impact may occur if the project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Section II, Project Description, lists the entitlements and approvals that are requested as part of the Project. These entitlements could potentially conflict with the LAMC and applicable plans and policies. This potential impact shall be evaluated in an EIR.

- c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.** Although not specified in the *L.A. CEQA Thresholds Guide*, a project-related significant adverse effect could occur if the project site were located within an area governed by a habitat conservation plan or natural community conservation plan.

As discussed in Section 4(f) above, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area that has been previously developed with commercial uses, and is also within an urbanized area of Los Angeles. Therefore, the Project would not have the potential to cause such effects. No impact would occur and further analysis of this issue is not required.

## **11. MINERAL RESOURCES**

- a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

**No Impact.** A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if a project development would convert an existing or future regionally-important mineral extraction use to another use, or if a project development would affect access to a site used or potentially available for regionally-important mineral

resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, a project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and
- Whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is fully developed and no oil wells are present on the Project Site.<sup>32</sup> According to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is not located within an oil field or major oil drilling area. According to the California Division of Mines and Geology Mineral Land Classification Map, the Project Site is within a mineral resources zone (MRZ-2).<sup>33</sup> However, as the Project Site is entirely developed, there would be no impact on existing or future regionally important mineral extraction sites. Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** Because the Project Site is subject to the applicable land use and zoning requirements in LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site.<sup>34</sup> Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact associated with mineral resources would occur and further analysis of this issue is not required.

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<sup>32</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed: November 21, 2014.

<sup>33</sup> California Division of Mines and Geology, *Mineral Land Classification Map, Hollywood Quadrangle*, May 25, 1979.

<sup>34</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report*, website: [www.zimas.lacity.org](http://www.zimas.lacity.org), accessed: November 21, 2014.

## 12. NOISE

- a) **Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Impact.** Although not specified in the City of Los Angeles *LA CEQA Thresholds Guide*, a significant impact may occur where a project would not comply with the City of Los Angeles General Plan Land Use Compatibility Standards for Noise or the City of Los Angeles Noise Ordinance (Municipal Code Ordinance No. 144,331). Noise that could be generated by the Project includes construction noise and traffic noise during construction and operation, which could potentially exceed local noise standards. Noise from the introduction of a new land use would also result from operation of the Project. This potential impact shall be evaluated in an EIR.

- b) **Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the U.S. is referenced as vibration decibels (VdB). Persons could be exposed to excessive groundborne vibration and groundborne noise as a result of the construction of the Project. This potential impact shall be evaluated in an EIR.

- c) **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Impact.** A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the project. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would typically have a significant impact on noise levels from project operations if the project would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level is at least 75 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more would cause a significant impact. Permanent noise levels above current ambient noise levels could be generated during the operation of the Project because of the introduction of a new hotel on a site that currently has few people. This potential impact shall be evaluated in an EIR.

- d) **Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Potentially Significant Impact.** A significant impact may occur if the project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA (CNEL) or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA (CNEL) or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5dBA (CNEL) at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.

Temporary or periodic noise could be generated during the construction of the Project compared to the existing land uses on the Project Site. This potential impact shall be evaluated in an EIR.

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

**No Impact.** A significant impact would occur if the Project Site was located within the noise impact area of a public airport land use plan or within two miles of a public use airport and would expose people residing or working in the project area to excessive noise levels from aircraft operations.

The Project Site is not located within the noise impact area of a public airport land use plan or within two miles of a public use airport.<sup>35</sup> Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** A significant impact may occur if a project were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located within the vicinity of a private airstrip. Therefore, no impact would occur and further analysis of this issue is not required.

### **13. POPULATION AND HOUSING**

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

**Less-Than-Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project

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<sup>35</sup> Los Angeles County Airport Land Use Commission, *Comprehensive Land Use Plan, Revised December 1, 2004*, website: [http://planning.lacounty.gov/assets/upl/data/pd\\_alup.pdf](http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf), accessed: January 26, 2015.

results in a significant impact on population and housing growth shall be made considering the following factors:

- The degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;
- Whether a project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

### **Construction**

Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Therefore, construction workers employed for the Project would not likely relocate their place of residence as a result of working on the Project. Further, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, the construction workers would not likely relocate their homes as a result of employment on the Project. Impacts on population and housing due to construction activities would be less than significant.

### **Operation**

Operation of the Project would generate approximately 115 full- and part-time jobs.<sup>36</sup> While new employment opportunities would be created with the Project, it is anticipated that most of the expected employees would be drawn from the existing labor force in the region and would not require the need to relocate or place a demand for housing in the area. It is possible that some of the future employees would be permanent residents to the area; however, it is unlikely that this growth would be substantial in the context of the growth forecasted for the City or the Central City Community Plan Area. Thus, any impacts on area population growth would be less than significant.

The Project would also not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the Project would not indirectly induce population growth and impacts would be less than significant. Further analysis of this issue is not required.

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<sup>36</sup>  $100,931 \text{ sf} \times 1.1325 \text{ employees}/1,000 \text{ sf} = 114.3$  (Employee generation rates were derived from the Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002, page ES-2.)

**b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** For the purpose of this Initial Study, a significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- A net loss of housing equal to or greater than a one-half block equivalent of habitable housing units through demolition, conversion, or other means; or
- A net loss of any existing housing units affordable to very low- or low-income households (as defined by federal and/or City standards), through demolition, conversion, or other means.

The Project Site contains a surface parking lot and a single-story 1,000-square-foot restaurant. No housing units would be removed. Therefore, no impact would occur and further analysis of this issue is not required.

**c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**No Impact.** For the purpose of this Initial Study, a project-related significant adverse effect could occur if a project would result in the displacement of a substantial amount of people. The Project Site contains a surface parking lot and a single-story 1,000-square-foot restaurant. No people would be displaced because there are no residential land uses on the Project Site. Therefore, no impact would occur and further analysis of this issue is not required.

## **14. PUBLIC SERVICES**

**Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:**

**a) Fire protection?**

**Potentially Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance. The LAFD Fire Code identifies the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company is one (1) mile and a truck company is one and a half (1.5) mile. If either response distance is exceeded, installation of automatic fire sprinkler systems would be required for all structures

located on the Project Site.<sup>37</sup> The Project would require more fire protection services than the existing land uses because it involves a new intensity of development on the Project Site. The Project could, therefore, potentially result in the need for increased fire protection. This potential impact shall be evaluated in an EIR.

**b) Police protection?**

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and a project's proportional contribution to the demand; and
- Whether a project includes security and/or design features that would reduce the demand for police services.

The Project would require police protection services because it would introduce employees and visitors to the area that would require police protection, which could potentially result in the need for new or physically altered governmental facilities. This potential impact shall be evaluated in an EIR.

**c) Schools?**

**Less-Than-Significant Impact.** For the purpose of this Initial Study, 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). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on public schools shall be made considering the following factors:

- The population increase resulting from a project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and a project's proportional contribution to the demand;

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<sup>37</sup> Section 507.3.3, Table 507.3.3 City of Los Angeles Fire Code. website: [http://www.ecodes.biz/ecodes\\_support/free\\_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf](http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf), accessed: January 26, 2015.

- Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether a project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Los Angeles Unified School District (LAUSD) currently provides public education services for the residents of Los Angeles. The LAUSD jurisdiction encompasses an area of 720 square miles, serves approximately 640,000 students, and operates over 900 schools and 187 public charter schools.<sup>38</sup> The LAUSD is divided into seven local districts and the Project Site is located within Local District 2. Schools located in the City that would serve the Project Site are the following: 9<sup>th</sup> Street Elementary School, Liechty Middle School, and Belmont High School.<sup>39</sup> Table IV-1 (LAUSD School Capacity and Enrollment) lists the location, enrollment capacities, 2013 to 2014 enrollments, and number of students above or below capacity for each of the schools.

**Table IV-1**  
**LAUSD School Capacity and Enrollment**

School Type (Grade)	School Name	Location	Capacity	2013-2014 Resident Enrollment <sup>a</sup>	(-)Under / (+)Over Capacity
Elementary School (Grades K-6)	9 <sup>th</sup> Street	835 Stanford Avenue	267	199	-68
Middle School (Grades 7-8)	Liechty	650 S. Union Avenue	1,197	1,367	+170
Senior High School (Grades 9-12)	Belmont High School	1575 W. 2 <sup>nd</sup> Street	7,699	6,461	-1,238
<sup>a</sup> Resident enrollment is the total number of students living in the school's attendance area and who are eligible to attend the school. Resident enrollment includes magnet students. In the case of the three schools listed in this table, actual enrollment is less than resident enrollment. However, resident enrollment is used here to present a conservative analysis.					
Source: Letter correspondence, Los Angeles Unified School District, Rena Perez, Director, November 10, 2014.					

As shown in Table IV-1, 9<sup>th</sup> Street Elementary School and Belmont High School are operating under capacity. Liechty Middle School is operating over capacity.

9<sup>th</sup> Street Elementary is estimated to have a capacity of 267 seats and had a resident enrollment of 199 students in the 2013-2014 school year. Therefore, 9<sup>th</sup> Street Elementary has a capacity to accommodate 68 additional students and, thus, operates below capacity.

Liechty Middle School is estimated to have a capacity of 1,197 students and had a resident enrollment of 1,367 students in the 2013-2014 school year. Although Liechty Middle School currently operates above

<sup>38</sup> Los Angeles Unified School District website: <http://achieve.lausd.net/about>, accessed: June 10, 2015.

<sup>39</sup> Letter correspondence, Los Angeles Unified School District, Rena Perez, Director, November 10, 2014.

capacity, the LAUSD's five-year projection indicates that this school will have a seating overage of 154 seats in the future (2018-2019 school year).<sup>40</sup> As discussed in Section II (Project Description) of this Initial Study, the estimated completion of Project building construction is the third quarter of 2018. Therefore, Liechty Middle School would operate below capacity at the time that construction of the Project is completed, and would be able to accommodate 154 additional students.<sup>41</sup>

Belmont High School is estimated to have a capacity of 7,699 seats and had a resident student enrollment of 6,461 for the 2013-2014 school year. Therefore, Belmont High School operates below capacity and would be able to accommodate 1,238 additional students.

As shown in Table IV-2 (Project Student Generation), the Project would generate a net increase of approximately 26 students.

**Table IV-2  
Project Student Generation**

Land Use	Size	Student Generation Factor	Total <sup>b</sup>
<b>Existing Uses</b>			
Restaurant <sup>a</sup>	1,000 sf	0.000344	1
<b>Total Existing Students</b>			<b>1</b>
<b>Proposed Uses</b>			
Hotel <sup>a</sup>	105,841 sf	0.000254	27
<b>Subtotal</b>			<b>27</b>
Less Existing			1
<b>Total Net New Students Generated</b>			<b>26</b>
<i>Note: sf = square feet</i> <sup>a</sup> Los Angeles Unified School District Justification Study (March 2014). <sup>b</sup> Rates were rounded up to the nearest whole number. <i>Source (table): EcoTierra Consulting, 2015.</i>			

Typically, new employees associated with hotel uses (including the various guest amenities) would generally include hotel managers, desk clerks, bellhops, valets, housekeeping and janitorial staff, administrative staff, maintenance staff, restaurant staff. These positions, many of which are part-time, are typically filled by persons already residing in the vicinity of or within commuting distance of the workplace. Though such employees generally do not relocate their households due to such employment opportunities and although it is very likely that some of the students indirectly generated by the Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the Project would be new to the school district. As previously discussed, all three schools serving the Project Site would operate under capacity at the time that construction of the Project is completed. The net increase of 26 new students to local LAUSD schools would not cause the schools reach or surpass their capacities. In addition, pursuant to the California Government Code Section

<sup>40</sup> Letter correspondence, Los Angeles Unified School District, Rena Perez, Director, November 10, 2014.

<sup>41</sup> Letter correspondence, Los Angeles Unified School District, Rena Perez, Director, November 10, 2014.

17620, payment of school fees established by the LAUSD would be required for the project. Therefore, impacts on the schools would be less than significant.

**d) Parks?**

**Less-Than-Significant Impact.** For the purpose of this Initial Study, a significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and a project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The parks nearest to the Project Site are listed in Table IV-3, Parks and Recreational Facilities.

**Table IV-3  
Parks and Recreational Facilities**

Type	Park Name	Address	Distance (miles)	Size (acres)
Pocket park	Spring Street Park	428 Spring Street	<0.5	0.8
Neighborhood park	Alpine Recreation Center	817 Yale Street	<1.0	1.93
Neighborhood park	City Hall Park	200 N. Spring Street	<1.0	1.71
Neighborhood park	Pershing Square Park	525 S. Olive Street	<1.0	4.44
Community park	Echo Park	1632 Bellevue Avenue	<2.0	29.41
Community park	MacArthur Park	233 W. 6th Street	<2.0	32.15
<i>Note: sf = square feet</i>				
<i>Source: Letter correspondence, City of Los Angeles Department of Recreation and Parks, Ramon Barajas, Assistant General Manager, Planning, Construction and Maintenance Branch, December 2, 2014.</i>				

Although there are several parks in the vicinity of the Project Site, it is located in an area of the City that does not meet City's standard parkland-to-population ratio for neighborhood and community parks.

However, the Project would not increase the residential population within the project area and, thus, would not increase demand for public parkland based on the standard minimum parkland-to-population ratio identified above. Additionally, the proposed hotel would offer on-site recreational amenities and

facilities for guests, including a rooftop pool and gym as well as open spaces (e.g., terraces) that would reduce demand for park services by hotel guests. Therefore, impacts to parks and recreational facilities would be less than significant.

**e) Other public facilities?**

**No Impact.** For the purpose of this Initial Study, 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 a Project Site. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for library services (e.g., library facilities or direct financial support to the Los Angeles Public Library).

The Project Site is less than one mile from two branches of the LAPL:

- Richard J. Riordan Central Library (Central Library), located at 630 W. 5th Street, 0.6 miles northwest; and
- Little Tokyo Library, located at 203 S. Los Angeles Street, 0.7 miles northeast.

Two additional branches serve the Project site:

- Chinatown Branch, located at 639 N. Hill Street, 1.4 miles north; and
- Pico Union Branch, located at 1030 S. Alvarado Street, 2.2 miles southwest.

At 538,000 square feet, the Richard J. Riordan Central Library meets and exceeds the current demand for library services in the community. The Richard J. Riordan Central Library is open seven days and four nights a week. Currently, the Richard J. Riordan Central Library houses approximately 2.6 million volumes and has 275 staff positions. It presently has resources for children, teens, adults, and Spanish speakers. The Richard J. Riordan Central Library also provides free wireless Internet access and wireless printing. Similar to every branch of the LAPL, the Richard J. Riordan Central Library offers free use of computer workstations that provide access to the LAPL's information network. These workstations also provide Internet access, the ability to search the LAPL online catalog, subscription databases, word

processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.<sup>42</sup>

The three branch libraries serve a total population of approximately 200,000 and the Central Library serves the entire population of the City of Los Angeles (approximately 3.8 million).<sup>43</sup> The existing facilities adequately meet the current demand for library services. The Project would generate approximately 120 jobs,<sup>44</sup> many of which are part-time positions and would not result in the generation of permanent residents. The type of jobs associated with a hotel are typically filled by persons already residing in the vicinity of or within commuting distance of the workplace and not likely to relocate their households due to such employment opportunities. Further, the current and expected labor force may already be residents within the LAPL service area and not new to the entire system. Therefore, the Project would not result in the need for expanded or newly constructed library facilities and no impact would occur.

## 15. RECREATION

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

**Less-Than-Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.

As discussed previously, the Project would not increase the residential population within the project area and, thus, would not increase demand for public parkland based on the standard minimum parkland-to-population ratio identified above. Additionally, the proposed hotel would offer on-site recreational amenities and facilities for guests, including a rooftop pool and gym as well as open spaces that would reduce demand for park services by hotel guests. Therefore, Project impacts would be less than significant with respect to the deterioration of park or recreational facilities.

- 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?**

**No Impact.** For the purpose of this Initial Study, a significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

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<sup>42</sup> Email correspondence, City of Los Angeles Public Library, Tom Jung, Management Analyst II, Business Office, December 11, 2014.

<sup>43</sup> Email correspondence, City of Los Angeles Public Library, Tom Jung, Management Analyst II, Business Office, December 11, 2014.

<sup>44</sup>  $105,841 \text{ sf} \times 1.13 \text{ employees}/1,000 \text{ sf} = 119.6$  (Employee generation rates were derived from the Los Angeles Unified School District, Lodging Development School Fee Justification Study, March 2014, page 15.)

The Project does not include the construction or expansion of parks facilities. Therefore, no impact would occur.

## 16. TRANSPORTATION/TRAFFIC

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

**Potentially Significant Impact.** A significant impact would occur if the change in traffic volumes at the study-area intersections associated with project equals or exceeds the thresholds of significance adopted by the City of Los Angeles. The construction and operation of the Project would generate traffic from construction vehicles that could potentially conflict with an applicable plan, ordinance, or policy. Operation of the proposed hotel could also increase traffic from guests and employees driving to and from the Project Site as well as using bicycles or public transit to travel. This potential impact shall be evaluated in an EIR.

- b) **Would the project 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?**

**Potentially Significant Impact.** A significant impact may occur if the project would cause a substantial change in freeway conditions or Congestion Management Program (CMP)-designated surface streets when compared to conditions without the project. The operation of the Project would generate traffic, as stated above. Similarly, construction would increase traffic, which could conflict with a CMP. This potential impact shall be evaluated in an EIR.

- c) **Would the project 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?**

**No Impact.** This question would apply to the Project only if it were an aviation-related use. The Project does not include any aviation-related uses; therefore, it would have no impact on any airport. The Project would also not require any modification to flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur and further analysis of this issue is not required.

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

**No Impact.** For the purpose of this Initial Study, a significant impact may occur if a project included new roadway design or introduced a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. No hazardous design features or incompatible uses would be introduced with the Project that would create significant

hazards to the surrounding roadways. Therefore, no impact would occur and further analysis of this issue is not required.

**e) Would the project result in inadequate emergency access?**

**No Impact.** For the purpose of this Initial Study, a significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or threatened the ability of emergency vehicles to access and serve the project site or adjacent uses. As previously discussed in Question 8(g), the Project is not located in or near an adopted emergency response or evacuation plan.<sup>45</sup> Moreover, the Project would provide adequate emergency access in conformance with City requirements. Furthermore, the Applicant would consult with the LAPD and LAFD prior to Project construction. Therefore, there would be no impact related to emergency access and further analysis of this issue is not required.

**f) Would the project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if the project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site. The Project could potentially result in an increase the demand for public transit, bicycle, and pedestrian facilities from hotel guests and employees; this includes, but is not limited to, the bikeway that fronts the Project Site along Spring Street and the use of local Metro rail lines and bus lines. This potential impact shall be evaluated in an EIR.

## **17. UTILITIES AND SERVICE SYSTEMS**

**a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**Less-Than-Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency.

This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

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<sup>45</sup> *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Critical Facilities & Lifeline Systems in the City of Los Angeles, April 1995.*

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the project area. The Project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the Project would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB. Therefore, impacts would be less than significant and further analysis of this issue is not required.

**b) Would the project 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?**

**Potentially Significant Impact.** For the purpose of this Initial Study, 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 a Project Site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water or wastewater shall be made considering the following factors:

- The total estimated water demand for a project;
- Whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project buildout;
- The amount by which a project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.
- A project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or
- A project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The construction and operation of the Project would generate wastewater, and would increase the demand for water supplies compared to the existing surface parking lot and 600-square-foot structure; this increase could potentially increase the need for new or expanded water or wastewater treatment facilities. This potential impact shall be evaluated in an EIR.

- c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if the volume of storm water runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new storm water drainage facilities. The Project would develop a 28-story building on a property that is currently occupied by a surface parking lot and one-story restaurant building, which could contribute stormwater runoff to the existing drainage system; potentially resulting in the need for new or expanded stormwater drainage facilities. This potential impact shall be evaluated in an EIR.

- d) **Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on water shall be made considering the following factors:

- The total estimated water demand for a project;
- Whether sufficient capacity exists in the water infrastructure that would serve a project, taking into account the anticipated conditions at project buildout;
- The amount by which a project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and
- The degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The Project could increase the demand for water supplies to the Project Site by introducing new users to the Project Site as compared to the existing water use. This potential impact shall be evaluated in an EIR.

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

**Potentially Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if:

- A project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- A project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Project would generate wastewater from the addition of a new hotel, which could require additional wastewater treatment capacity. This potential impact shall be evaluated in an EIR.

**f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**Potentially Significant Impact.** For the purpose of this Initial Study, 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of a project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether a project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

The construction and operation of the Project would generate solid waste, which would be disposed of at local landfills that may or may not have sufficient permitted capacity. Furthermore, the demand for solid waste disposal would be greater than the existing land uses on the Project Site. This potential impact shall be evaluated in an EIR.

**g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**Potentially Significant Impact.** A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The construction and operation of the Project would generate solid waste, which could result in non-compliance with statutes and regulations. This potential impact shall be evaluated in an EIR.

## **18. MANDATORY FINDINGS OF SIGNIFICANCE**

**a) Does the project 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?**

**Potentially Significant Impact.** With respect to the overall quality of the environment, the Project's potential impact is addressed throughout this Initial Study and will also be addressed in the Draft EIR. As discussed under Questions 4(a) through 4(f), the Project would result in no impact with respect to biological resources. However, the Project could potentially result in a significant impact with respect to historic resources, as discussed under Question 5(a). The Project Site is located within a historic district, which could represent an example of a major period of California's history. As such, the Project could result in a potential impact on historic resources. This potential impact shall be evaluated in an EIR.

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

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project, in combination with the related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The impacts of the Project could potentially combine with the impacts of related projects. For those environmental issues discussed above that are to be analyzed in the EIR, the EIR will include an analysis of the cumulative impacts associated with those environmental issues. The following is a list of the cumulative impacts analyses to be included in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation/Traffic
- Utilities

For those environmental issues that are to be scoped out of the EIR, the cumulative impacts analysis is provided below.

**Agriculture and Forest Resources**

**No Impact.** Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use nor result in the loss of forestland or conversion of forestland to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site

and the surrounding area are not included in the Important Farmland category.<sup>46</sup> The Project Site and the related projects are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur and further analysis of this issue is not required.

### Biological Resources

**No Impact.** As discussed above, the Project would not have significant impacts on biological resources. It is unlikely that any related projects would result in impacts to biological resources because the Project vicinity is highly developed and urbanized. Therefore, the Project would not contribute to any potential cumulative impact on biological resources. Therefore, no cumulative impact would occur and further analysis of this issue is not required.

### Mineral Resources

**No Impact.** As discussed above, the Project would have no impact on mineral resources. It is unlikely that any related projects would result in the loss of availability of known mineral resources because the Project vicinity is developed and urbanized. In addition, according to the Los Angeles City General Plan Safety Element Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is not located within an oil field or major oil drilling area. Therefore, because the Project would not contribute to any cumulative impact on mineral resources, there would be no cumulative impact. Further analysis of this issue is not required.

### Population and Housing

**Less-Than-Significant Impact.** The related projects and other potential development projects that may occur throughout the City of Los Angeles SCAG subregion would be expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its housing projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. The Project would not directly add population or housing to the City of Los Angeles subregion, and the Project's indirect additions to population growth would not be substantial. Accordingly, the effects of cumulative population and housing growth associated with the Project and other development within the City of Los Angeles subregion would be accommodated in SCAG forecasts over time and the Project would not contribute to a cumulatively considerable effect with respect to population and housing growth. Therefore, cumulative impacts would be less than significant and further analysis of this issue is not required.

### Parks

**Less-Than-Significant Impact.** Implementation of the Project, in combination with the related projects and regional growth, would further increase demand for park and recreational facilities in the Central

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<sup>46</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Farmland Mapping and Monitoring Program, Important Farmland in California, 2006, [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006\\_wallsize.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_wallsize.pdf), accessed October 16, 2014.

City area. However, employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities and would not, therefore, contribute to the future demand on parks. Future impacts on park facilities would be mitigated through the collection of park fees on new development and the provision of parkland. Additionally, the Project includes recreational amenities that would be used by project residents, which would help reduce the demand of project residents on parks and recreational facilities in the community. Therefore, the cumulative impact would be less than significant.

## Recreation

**Less-Than-Significant Impact.** Implementation of the Project, in combination with the related projects and regional growth, would further increase demand for recreational facilities. Employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit recreational facilities and would not, therefore, contribute to the future demand on parks. Future impacts on parks and recreational facilities would be mitigated through the collection of park fees on new development and the provision of parkland. Additionally, the Project includes recreational amenities that would be used by project residents, which would help reduce the demand of project residents on parks and recreational facilities in the community. Therefore, the cumulative impact would be less than significant.

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

**Potentially Significant Impact.** For the purpose of this Initial Study, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. The Project could potentially result in direct or indirect adverse environmental effects on human beings with respect to the following subjects:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation/Traffic
- Utilities

These potential impacts shall be evaluated in an EIR.

## V. PREPARERS OF THE INITIAL STUDY

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## VI. ACRONYMS AND ABBREVIATIONS

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AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CiSWMPP	City Solid Waste Management Policy Plan
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CWC	California Water Code
cy	Cubic yards
ESCP	Erosion and Sediment Control Plan
HTP	Hyperion Treatment Plant
IS	Initial Study
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAUSD	Los Angeles Unified School District
LID	Low Impact Development
LOS	Level of Service
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollution Discharge Elimination System
ppm	parts per million
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District

SMGB	State Mining and Geology Board
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
V/C	Volume/capacity
VdB	Vibration decibels
WDR	Waste Discharge Requirements
ZIMAS	Zoning Information and Map Access System