6.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

6.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. CEQA Section 21099(d)(1) states that a project's aesthetic impacts shall not be considered significant if the project is a residential, mixed-use residential, or employment center project; that is located on an infill site within a transit priority area (TPA). An infill site is defined as an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. A TPA is defined as an area within one-half mile of major transit stop that is existing or planned. The Project meets these criteria. As such, aesthetic impacts are considered less than significant.6.0_

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less Than Significant Impact. Refer to Response to Checklist Question 1(a) above.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

Refer to Response to Checklist Question 1(a) above. As such, the Project would not have a considerable contribution to cumulative aesthetic impacts.

6.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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. The Project site is located within a highly developed and urbanized area of the City. The California Department of Conservation designates the Project site as "urban and built-up land."[1] No portion of the Project site or the surrounding area is designated as Farmland of Statewide Importance,

1 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2010, map, Sheet 2 of 3 (January 2012), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.

Unique Farmland, or Farmland of Local Importance and no farmland or agricultural activity exists on or near the Project site.[2] No impacts to farmland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site is subject to the applicable land use and zoning requirements of the Los Angeles General Plan and Municipal Code (LAMC). The Project site consists of one lot and is zoned C4-4D[3] and has the land use designation of Regional Center Commercial.[4] The Project site is not zoned for agricultural production and no Williamson Act contracts are in effect for the Project site.[5] No impacts would occur regarding agricultural zoning or Williamson Act lands.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

No Impact. As mentioned above, the Project site is zoned C4-4D and has the land use designation of Regional Center Commercial. The Project site is not zoned as forestland or timberland, and there is no timberland production at the Project site. No impacts regarding forest or timberland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

2 City of Los Angeles, ZIMAS, "Parcel Profile Report," zimas.lacity.org, accessed July 2019.
3 City of Los Angeles, ZIMAS, "Parcel Profile Report," zimas.lacity.org, accessed August 2018.
4 City of Los Angeles, Center *City Community Plan*, "Generalized Land Use Map," September 2016.
5 California Department of Conservation, *Division of Land Resource Protection*, "The California Land Conservation Act (The Williamson Act) 2014 Status Report" (2015).

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

No Impact. The site and the surrounding area does not contain any forest land as defined in the Public Resources Code (PRC). No impacts to forest land would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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?

No Impact. Neither the Project site nor the surrounding area contain agricultural or forestry uses. No impacts to farmland would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Neither the Project Site nor any of the related projects within downtown Los Angeles are used or designated as agricultural land or forest land. As such, the Project would not contribute to cumulative impacts to agricultural or forestry resources.

6.3 AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact.

Existing Project Site Emissions

The Project site is currently developed with the World Trade Center building. The current site usage generates existing vehicle trips and air quality emissions from operations related for the office, retail, and parking uses. **Table 6.3-1: Existing Operational Air Quality Emissions** identifies the existing emissions from the existing uses. The most current CARB-approved, SCAQMD-recommended air quality modeling software, the California Emissions Estimator Model (CalEEMod version 2016.3.2), was used to estimate existing air quality operational emissions.

The Project site is located within the South Coast Air Basin SCAQMD is the agency principally responsible for comprehensive air pollution control and the reduction of the emission of criteria pollutants in the Basin. To that end, SCAQMD, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies as part of its comprehensive planning obligations. SCAQMD develops rules and regulations, establishes permitting requirements, oversees an air permitting regime, inspects emissions sources, and enforces such measures through broad enforcement authority, including the ability to issue fines, order corrective measures, and to limit, condition or rescind permits to operate.

Table 6.3-1
Existing Operational Air Quality Emissions

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Area	<1	<1	<1	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	<1	8	6	<1	1	<1
Total	1	2	6	<1	2	<1
SCAQMD threshold	55	55	550	150	150	55
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

_____
Notes:
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.
Refer to Air Quality Modeling Results in ***Appendix A.***

To fulfill its commitments as an MPO under the Sustainable Communities and Climate Protection Act, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the Air Quality Management Plan. Projects that are consistent with the projections of population forecasts are considered consistent with the AQMP.

The air quality plans applicable to the Project site are the SCAQMD's 2016 AQMP, the 2016–2040 RTP/SCS, and the City's Air Quality Element.

2016 AQMP

The 2016 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP do not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, project, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP.

The Air Basin is designated as nonattainment at the federal level for O3 and PM2.5; and at the state level for O3, PM10, and PM2.5. SCAQMD developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin.

As discussed and shown in **Table 6.3-2** below, temporary emissions associated with construction of the Project would fall below SCAQMD thresholds for VOCs, NOx, CO, SOx, PM10, and PM2.5.

As discussed and shown in **Table 6.3-3** below, long-term emissions associated with operation of the Project would not exceed SCAQMD thresholds for VOCs, NOx, CO, SOx, PM10, and PM2.5.

The Project's maximum potential NOx, CO, PM10, and PM2.5 daily emissions during construction and operation were analyzed to determine potential effects on localized concentrations and to determine if the potential exists for such emissions to cause or affect a violation of an applicable AAQS. As shown in **Table 6.3-4**, NOx, CO, PM10, and PM2.5 emissions would not exceed the SCAQMD localized significance thresholds.

The Project is also located in an urban area, which would reduce vehicle trips and vehicle miles traveled due to the Project's urban infill characteristic and proximity to public transit stops. These measures and features are consistent with existing recommendations to reduce air emissions. Since the AQMP forms the basis for strategies by growth projections, the future development would be consistent with the planned land uses and would not conflict or obstruct implementation with the AQMP.

2016–2040 RTP/SCS

The growth projections from SCAG's 2016–2040 RTP/SCS form the basis for the strategies identified in the AQMP. The City of Los Angeles had a total of 3,845,500 people in 2012, and it is projected that a total population of 4,609,400 by the year 2040.[6] The population increase within the City between 2012 and 2040 was forecasted to be 763,900. As discussed in **Section 3.0** above, the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. This would yield to approximately 0.1 percent of the anticipated increased projected within the City. This increase would not result in population and housing growth that would cause growth within the City to exceed the SCAG population forecast. Furthermore, as discussed in **Table 3.1-1** above and **Section 6.13: Population and Housing** below, the Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Project is consistent with SCAG policies. Because the Project is located in a TPA and provides for needed housing and affordable housing, the population growth generated by the Project would not conflict with the City's and SCAG's growth policies.

Air Quality Element

The City's Air Quality Element includes Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. **Table 6.3-2: Applicable Goals and Policies of the Air Quality**

6 Southern California Association of Governments, *Final 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy* (April 2016), Demographics and Growth Forecast.

Element, evaluates the consistency of the Project with the applicable air quality goals, objectives, and policies in the Air Quality Element. As discussed below, the Project construction and operations would not conflict with or be inconsistent with applicable air quality policies of the General Plan.

Table 6.3-2
Applicable Goals and Policies of the Air Quality Element

Recommendation	Analysis of Project Consistency
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**Consistent**. The Project would be consistent with SCAG RTP/SCS goals and objectives under SB 375 to implement "smart growth". The Project would provide residential uses and employment opportunities in close proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would meet the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The project would also reduce VMT as a result of its urban infill location in a dense mixed-use area. The Project would add new infill residential units, with convenient access to public transit, which would allow people to live near work and recreational amenities. The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and inter-city transit operators. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.
Policy 1.3-1: Minimize particulate emissions from construction sites.	**Consistent**. The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions associated with construction-related vehicular traffic
Goal 2: Less reliance on single-occupant vehicles with fewer commute and nonwork trips.	**Consistent**. The Project's land use characteristics would reduce trips and VMT due to its urban infill location in a dense mixed-use area that includes nearby housing, employment, commercial and service uses with nearby access to multiple nearby public transportation routes. As discussed above, The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and inter-city transit operators.
Policy 2.1-1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be within a quarter-mile of existing and future public transportation, and would provide access and pedestrian links to surrounding services and employment.

Recommendation	Analysis of Project Consistency
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**Consistent**. The Project's characteristics would reduce trips and VMT due to its infill location, ready access to public transportation, close proximity to multiple other destinations including job centers, commercial uses, and services, and is pedestrian and bicycle friendly. As discussed above, The Project site is in a highly urbanized area in the City within a High Quality Transit Area (HQTA) and a Transit Priority Area (TPA) The Project site is currently served by a total of seven local and inter-city transit operators.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would provide new residential units in an infill location that is walkable to public transportation, employment retail, restaurant, and entertainment uses.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would provide new residential units in an infill location that is walkable to public transportation. The Project would also provide bicycle parking and would maintain the existing pedestrian bridges connecting to adjacent uses.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project environmental review includes an analysis of air quality impacts.
Policy 4.2.5: Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.	**Consistent.** The Project would provide new residential units in an infill location that is walkable to public transportation, employment retail, restaurant, and entertainment uses. The Project would also provide bicycle parking and would maintain the existing pedestrian bridges connecting to adjacent uses.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures, including passive methods such as site orientation and tree planting.	**Consistent**. The Project would be designed and operated to meet the applicable requirements of the State of California Green Building Standards Code and City of Los Angeles Green Building Code. The Project would incorporate sustainability measures and performance standards including implementing a construction waste management plan to diver all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. As described above, the Project would include providing green space, landscaping, recreational amenities on three levels, and planting of 143 trees within the Project site and adjacent rights-of-way.
Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed and operated to meet the applicable requirements of the City of Los Angeles Green Building Code and provide the quantity of electric vehicle parking required by the City.

Emissions

Construction of the proposed Project is expected to last approximately 39 months and would fall into four principal phases: (1) demolition of existing uses; (2) building foundation; (3) structure construction; and

(4) exterior and interior finishing. Construction emissions were estimated according to the SCAQMD CEQA Air Quality Handbook and construction emission factors contained in the California Emissions Estimator Model (CalEEMod). The emission calculations assume the use of standard construction practices, such as compliance with SCAQMD Rule 403—Fugitive Dust, which requires all unpaved demolition and construction areas to be wetted at least three times a day during excavation and construction to minimize the generation of fugitive dust. In addition, SCAQMD Rule 1403 – Asbestos emissions from demolition/renovation activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities.

Construction of the Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from workers and haul trucks traveling to and from the Project site. In addition, fugitive dust emissions would result from various soil-handling activities. Mobile-source emissions, primarily NOx, would result from the use of construction equipment, such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

Each phase of construction would result in varying levels of intensity and a number of construction personnel. The construction workforce would consist of approximately 17 worker trips per day and 134 total hauling trips during demolition; 17 worker trips per day and 25 vendor trips per day during site preparation; 21 worker trips per day and 65 vendor trips per day during grading; 84 worker trips per day and 70 vendor trips per day during building construction; 147 worker trips per day and 45 vendor trips per day during architectural coating; and 147 worker trips per day and 45 vendor trips per day during paving.

The Project's maximum unmitigated daily emissions during construction are listed in **Table 6.3-3: Maximum Construction Emissions;** and unmitigated operational emissions are shown in **Table 6.3-4: Maximum Operational Emissions**. The analysis assumes that operation of all construction equipment for a given activity would occur simultaneously and continuously over the day. This would not actually occur, given that most equipment would operate only a fraction of each workday; moreover, many of the activities would not overlap on a daily basis. Therefore, the analysis represents a conservative scenario for construction activities. As shown in **Table 6.3-3**, emissions associated with construction would not exceed the applicable maximum daily SCAQMD thresholds for criteria pollutants. Furthermore, any asbestos or lead-based paint found from removal of the existing building would be properly removed and abated as required by State law, specifically Title 22 of the California Code of Regulations (CCR), the California Health and Safety Code, including the Hazardous Waste Control Law.

Operational emissions would be generated by both stationary and mobile sources from normal day-to-day activities associated with the Project. Stationary emissions would be generated by the consumption of natural gas for space- and water-heating equipment. Mobile emissions would be generated by motor

vehicles traveling to and from the Project site. The analysis of daily operational emissions has been prepared using the data and methodologies identified in the SCAQMD CEQA Air Quality Handbook and current motor vehicle emission factors in the CalEEMod model. The estimated emissions are based on development of all the proposed land uses on the Project site. As shown in **Table 6.3-4**, the emissions associated with the proposed Project would not exceed the SCAQMD recommended operational emission thresholds. The majority of emissions associated with Project operation (NOx and CO) are attributed to anticipated vehicular traffic traveling to and from the Project. Taking into account the removal of the existing uses, the overall net operational emissions would be below the applicable SCAQMD thresholds. As such, the Project would not conflict with or obstruct the implementation of the AQMP. Impacts would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG 2016- 2040 RTP/SCS Program EIR contained mitigation measures that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. Those measures are not applicable to the proposed Project as no significant effects have been identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Table 6.3-3
Maximum Construction Emissions

	VOC	NOx	CO	SOx	PM10	PM2.5
Unmitigated Maximum			**pounds/day**			
Year 2020	4	45	23	<1	21	12
Year 2021	11	31	30	<1	4	2
Year 2022	11	28	29	<1	4	2
Year 2023	10	17	25	<1	4	2
Maximum	11	45	30	<1	21	12
SCAQMD threshold	75	100	550	150	150	55
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes: Model assumed Tier 1 equipment
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.
Refer to Air Quality Modeling Results in ***Appendix A.***

Table 6.3-4
Maximum Operational Emissions

	VOC	NOx	CO	SOx	PM10	PM2.5
Source	**pounds/day**					
Area	15	1	47	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	2	8	24	<1	9	2
Total	17	10	71	<1	9	2
Existing	*1*	*2*	*6*	*<1*	*2*	*<1*
Net Total	16	8	65	<1	7	2
SCAQMD threshold	55	55	550	150	150	55
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.
Refer to Air Quality Modeling Results in ***Appendix A.***

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Basin is currently in State nonattainment for ozone, PM10, and PM2.5.[7] In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."[8] Therefore, if a project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

7 California Air Resources Board (CARB), "Area Designation Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm.

8 South Coast Air Quality Management District (SCAQMD), *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003),* Appendix A.

As discussed above, the Project would not generate construction or operational emissions that exceed SCAQMD's regional thresholds of significance. The Project would therefore not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant.

The SCAQMD devised the Localized Significance Threshold (LST) methodology[9] to assess the potential air quality impacts that would result in the near vicinity of the Project. This methodology considers emissions generated from on-site sources and excludes emissions from off-site vehicular traffic. The SCAQMD provides mass rate lookup tables as a screening tool to determine the likelihood of localized impacts from Project construction and operation. The lookup tables provide values for 1-, 2-, and 5-acre sites based on the geographic location of the Project and the proximity of sensitive receptors (i.e., schools, residences, hospitals, etc.). The Project is located in the Central Los Angeles County, SRA 1. As described above, the Project area is dominated by high-rise commercial office buildings and skyscrapers developed with park-like plazas.

Sensitive receptors are defined as schools, residences, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions who would be adversely impacted by changes in air quality. Sensitive receptors adjacent to the site include the mid- and high-rise office and hotel buildings to the north and northwest, across 3rd Street, and the L.A. Grand Hotel Downtown Building and the Westin Bonaventure Hotel & Suites to the south and west.

The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project site; and (3) the distance between the project site and the nearest sensitive receptors (e.g., residences, schools, hospitals). The SCAQMD provides screening criteria distances of 25, 50, 100, 200, and 500 meters and allows for linear interpolation to estimate the screening criteria between these distances. The Project Site (3.7 acres) is located within Source Receptor Area (SRA) 1, which covers the Central Los Angeles

9 South Coast Air Quality Management District, *Final Localized Threshold Methodology*, July 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

County.[10] On-site emissions from construction activities and Project operations have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table 6.3-5: Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated within the Project Site would not exceed the SCAQMD-recommended thresholds. Localized air quality impacts from construction and operational activities to the off-site sensitive receptors would be less than significant.

Table 6.3-5
Localized Significance Threshold (LST) Worst-Case Emissions

	NOx	CO	PM10	PM2.5
Source			**pounds/day**	
Construction				
Maximum daily emissions	42	22	20	12
LST threshold	179	8,637	190	110
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational				
Maximum daily emissions	2	8	<1	<1
LST threshold	179	8,637	46	27
Threshold Exceeded?	**No**	**No**	**No**	**No**

*Source: Refer to **Appendix A***
Note: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

Carbon Monoxide Hot Spot Analysis

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection operating at LOS D or worse where the project would increase the volume demand to capacity (V/C) ratio by two percent or more.[11]

A stated in the Transportation Impact Report prepared for this project, attached as **Appendix F**, would not worsen the LOS of any of the study intersections below C, nor increase the V/C ratio by two percent of

10 South Coast Air Quality Management District, SRA Monitoring Map, accessed July 2019, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf
11 SCAQMD, *CEQA Air Quality Handbook,* April 1993.

more for an intersection rated D or worse. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection.

Based on the above, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Less than Significant Impact. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings such as paint and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD *CEQA Air Quality Handbook,* land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.[12] The proposed Project would not include any of these or any other type of odor-producing uses. Odors associated with Project operation would be limited to on-site waste generation and disposal. All trash receptacles would be covered and properly maintained in accordance with City requirements to minimize odors. Impacts would be less than significant.

12 SCAQMD, *Air Quality Handbook*, accessed July 2018, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The *CEQA Air Quality Handbook* identifies possible methods to determine the cumulative significance of land use projects. All of SCAQMD's methods are based on performance standards and emission reduction targets necessary to attain the federal and State air quality standards identified in the AQMP. The analysis presented above evaluates whether the project is consistent with the AQMP and thus, would not jeopardize attainment of State and federal ambient air quality standards in the Basin. In addition to the cumulative significance methodologies contained in *CEQA Air Quality Handbook*, SCAQMD staff has suggested that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As presented above in **Tables 6.3-3** through **6.3-5**, construction and operation of the Project would result in daily emissions that fall below thresholds of significance recommended by SCAQMD. Therefore, the contribution of these emissions to the air quality within the South Coast Air Basin is not considered to be cumulatively considerable, and thus a less than significant impact.

The proposed project's implementation would not result in any new exceedance of air pollution standards nor contribute significantly to an existing air quality violation. Furthermore, the analysis determined that the implementation of the proposed project would not result in any significant adverse air quality impacts. As a result, no significant adverse cumulative impacts would occur.

6.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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 regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant. A project could have a significant impact on biological resources if it were to result in (a) 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; (b) 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 (c) interference with habitat such that normal species' behaviors are disturbed to a degree that may diminish the chances for long-term survival of a sensitive species.

Due to the urbanized and previously disturbed nature of the Project Site and the surrounding areas, species likely to occur on site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of undisturbed wildlife habitat currently on the Project Site, it is unlikely any special-status species listed by the California Department of Fish and Wildlife or by the U.S. Fish and Wildlife Service would be present on site. Existing trees and shrubs may provide temporary habitat for migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). Additionally, Section 3503, 3503.5 and 3512 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). However, tree removal would be undertaken pursuant to applicable City permits and requirements and would be required to comply with existing federal and State laws (MBTA and California Fish and Game Code, respectively). Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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. The Project site is previously developed in an urbanized setting. According to the California Department of Fish and Wildlife's CNDDB data, no riparian or other sensitive natural community are located on or adjacent to the Project site.[13] The Project site is also not located within a significant ecological area as determined by the City or County of Los Angeles.[14] No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

13 CDFW, CNDDB, "Maps and Data," https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

14 *City of Los Angeles General Plan,* "Conservation Element" (2001), "Exhibit B2: SEAs [Significant Ecological Areas] and Other Resources," January 2001.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A project could have a significant impact if it would result in the alteration of an existing wetland habitat. The Project site is entirely developed and largely covered with impermeable surfaces. The Project site is not in proximity to nor does it contain wetland habitat or a blue-line stream that is subject to the jurisdiction of the US Army Corps of Engineers or the CDFW. No federally protected streams, wetlands, or other water bodies, or any riparian habitat are located on or adjacent to the Project site.[15] Further, the Project site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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. A project could have a significant impact on biological resources if it would result in interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project site has been previously developed and is located in a heavily urbanized area of the City and is not located near any natural open space areas used by wildlife for movement. There are no wildlife migration corridors in the vicinity of the Project site.[16] No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

15 USFWS, *National Wetlands Inventory,* "National Wetlands Mapper," http://137.227.242.85/wetland/wetland.html.

16 County of Los Angeles*,* General Plan 2035*,* Fig. 9.2: Regional Habitat Linkages, available at http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf.

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

Less than Significant with Project Mitigation. A project-related, significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance.[17] As described in the Tree Report included as **Appendix B** to this document, there are nonnative ornamental trees on or adjacent to the Project site that would be removed during construction. These trees are not protected species under the City of Los Angeles Protected Tree Ordinance. However, they are off-site and within the public right of way and thus subject to the Board of Public Works, Urban Forestry Division.

Mitigation Measures

In order to ensure that potential impacts to public trees are less than significant, the following mitigation measure shall be incorporated into the Project.

MM-BIO-1 Tree Removal (Nonprotected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- Removal or planting of any tree in the public right(s)-of-way requires approval of the Board of Public Works. All trees in the public right(s)-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

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. A significant impact would occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[18] No impacts would occur.

17 City of Los Angeles Department of City Planning, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21

18 CDFW, "NCCP Plan Summaries," accessed September 2018, https://www.wildlife.ca.gov/conservation/planning/nccp/plans.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The project would not involve any loss of protected habitat since no such habitat is found within the project site's boundaries. New street trees would be planted in accordance with City requirements. Related projects within the surrounding area of downtown Los Angeles would be subject to the same requirements. As a result, no cumulative impacts on biological resources would be associated with the proposed project's implementation. As such, the Project would not contribute to cumulative impacts on biological resources.

6.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to section15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. Consistent with Section 15064.5(b) of the CEQA Guidelines, a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the CEQA Guidelines defines a historic resource as a resource that is (1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register.[19] The California Register automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (National Register).

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

19 CEQA Guidelines Section, 15064.5(a)(3).

A. Associated with events that have made a significant contribution to the broad patterns of our history; or

B. Associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Yield, or may be likely to yield, information important in prehistory or history.

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (SOHP) and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; Or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

The Los Angeles City Council adopted the Cultural Heritage Ordinance15 in 1962 and amended it in 2018 (Ordinance No. 185472). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission comprises five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The three criteria for HCM designation are stated below:

1. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, or community; or
2. The proposed HCM is associated with the lives of historic personages important to national, state, or local history; or
3. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

The Project site is not currently listed under national, state, or local landmark or historic district programs. It was not identified as being historic or potentially historic under federal, state, and local criteria in any historic resource surveys of the area. However, the current building on the property is approximately 45 years of age, the age at which it must be evaluated as a potential historical resource pursuant to CEQA. Therefore, the existing building on the Project site was evaluated to determine whether it meets the applicable standards to be deemed a potential historical resource within in the *Historical Resource Technical Report* prepared for the Project.[20]

The existing building was determined not to eligible for listing in the National Register of Historic Places, California Register of Historical Resources, nor did it contain sufficient historical significance or architectural distinction to qualify as a Los Angeles Historic-Cultural Monument. It does not have an important association with the redevelopment of Bunker Hill, nor does it represent the history of Bunker Hill in any significant way. No individuals of historic significance were identified during the course of research that were associated with this building. The property has elements of both Late Modernism and Sculpturalist (Glass Skin) architecture. The World Trade Center possesses some of the character-defining features of the style, including lack of traditional ornamentation, integrated landscape elements (in this case, courtyards, and concrete planters), steel windows, and prominent signs (though nonoriginal, the building's existing signs are similar in placement, size, and configuration). However, the property is not an excellent example of the style. It lacks many of the stylistic features of Late Modern architecture, and the dominant visual element of the building is that of a typical and utilitarian concrete parking structure. Accordingly, the Project would not result in any direct impacts on a historical resource.

20 GPA Consulting, *Historical Resource Technical Report* (October 2019); provided as **Appendix** C to this Initial Study.

There are five historical resources in the surrounding area: Bunker Hill Towers (222-234 S. Figueroa Street), Bank of America Plaza (333 S. Hope Street), Westin Bonaventure (404 S. Figueroa Street), Union Bank Building (445 S. Figueroa Street), and a portion of the Calvin S. Hamilton Pedway System. The threshold for determining significant impacts on historical resources is whether the proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the significance of the historical resource is materially impaired.

During construction, the pedestrian bridges attached to the building (part of the Calvin S. Hamilton Pedway system) may be altered, damaged, or removed but would be repaired or reinstalled in their original locations as part of the Project. The proposed work would comply with the Standards and therefore would have a less than significant impact on the pedway system as a historical resource.

None of the other historical resources in area would be affected by the Project, due to the physical and visual separation between these resources and the Project. As such, the Project would not cause a loss of integrity for any of these historical resources, and they would all continue to be eligible for listing as historical resources defined by CEQA. Therefore, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?

Less than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project would disturb unique archaeological resources that could exist within the Project site. A unique archaeological resource is defined as an artifact or object that meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The Project site was previously developed and minimal new ground disturbance activities are proposed. A records search of the California Historic Resources Information System (CHRIS) did not identify any

unique archaeological finds on or adjacent to the Project site.[21] As such, the likelihood of unearthing unique archeological resources is considered low.

It is possible that unknown archaeological resources could exist at the Project Site and could be encountered during grading and excavation activities. Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidently discovered during construction. The Project Applicant would be required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources. In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with federal, state, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Compliance with this condition would ensure that Project impacts related to unknown archaeological resources would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. A significant adverse effect could occur if grading or excavation activities would disturb previously interred human remains, including those interned outside formal cemeteries. No known burial sites are located on or adjacent to the Project site.[22] While additional excavation of depths up to 30-feet will be necessary for new footings, excavation for the existing parking levels would likely have disturbed subsurface remains that may have been present. Furthermore, the Project Applicant shall be required to comply with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the measures to be taken if human remains are

21 Tribal Cultural Resources Assessment, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this Initial Study.

22 See Tribal Cultural Resources Assessment, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this Initial Study.

discovered during excavation, grading, or construction activities. If human remains are encountered, Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains. With regulatory compliance, any potential significant impacts of the Project related to this threshold would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and related projects) that involves ground-disturbing activities is required to comply with the City's standard conditions of approval related to the discovery of artifacts during ground disturbance. For these reasons, the Project would not make a considerable contribution to significant cumulative impacts related to cultural resources. Impacts would be less than significant.

6.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

This section analyzes the Project's potential impacts on energy resources, focusing on three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This analysis addresses both construction and operational impacts associated with the consumption of energy resources. This section evaluates the demand for energy resources attributable to the Project and determines whether the current and planned electrical, natural gas, and petroleum-based fuel supplies and distribution systems are adequate to meet the Project's forecasted energy consumption. The information presented herein is based, in part, on the California Emissions Estimator Model (CalEEMod) outputs as calculated for **Section 6.3: Air Quality,** and **Section 6.8: Greenhouse Gases,** and on the calculations for this section as presented in **Appendix D: Energy Calculations**.

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

Less than Significant Impact. The determination of whether the project results in a significant impact on energy shall be made considering the following factors: (a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity-enhancing alterations to existing facilities; (b) whether and when the needed infrastructure was anticipated by adopted plans; and (c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements. A significant impact would occur if the Project required additional energy supply facilities and/or distribution infrastructure, creating significant direct or indirect impacts to the environment.

Construction

Construction of the proposed Project would require the use of various forms of energy. **Table 6.6-1: Summary of Energy Use during Construction**, summarizes the quantity of petroleum fuels and electricity

that would be consumed during construction. As shown in **Table 6.6-1,** a total of 12,283,800 gallons of diesel fuel, 48,097,334 gallons of gasoline fuel, and 216 kilowatt-hours of electricity would be consumed during construction. When compared to the worldwide oil supply in 2023 (buildout) of 103.9 million barrels per day,[23] and the City's 2023 (buildout) estimated power demand of 22,425 gigawatt-hours,[24] the oil and electricity usage during construction would be minimal.

Although construction would consume energy resources, construction activities would be temporary and would cease at the end of construction; therefore, there would be no long-term energy impacts associated with construction activities. The adopted energy conservation plans do not specifically discuss energy uses from construction activities. For this reason, and because the amount of fuel and electricity used during construction would be minimal and met by existing sources, impacts from construction would be less than significant.

Table 6.6-1
Summary of Energy Use during Construction

Fuel Type		Quantity
Diesel		
On-site construction equipment		112,779 gallons
Off-site motor vehicles		12,171,021 gallons
	Total	12,283,800 gallons
Gasoline		
On-site construction equipment		0 gallons
Off-site motor vehicles		48,097,334 gallons
	Total	48,097,334 gallons
Electricity		216 kWh

Source: Meridian Consultants, November 2019, ***Appendix D****.*

Operation

During operation of the proposed Project, energy would be consumed for a variety of purposes, including electricity consumption for lighting, laundry equipment, appliances, HVAC equipment, water supply and

23 Organization of the Petroleum Exporting Countries (OPEC), *2019 World Oil Outlook (September 2018)*. Available at https://www.opec.org/opec_web/en/publications/340.htm

24 City of Los Angeles Department of Water and Power, *2018 Retail Electric Sales and Demand Forecast,* November 5, 2018, Page 15, http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf.

delivery, and other commercial operations; natural gas consumption for space heating, cooking, and laundry dryers; and transportation fuel consumption from motor vehicles driving to and from the site.

As discussed in**,** above, CalEEMod was run for the Project utilizing the baseline conditions, and for the proposed Project in order to produce a net difference. The output for CalEEMod, takes into account that the Project would meet Title 24 energy requirements, including installation of high-efficiency lighting and the use of low-flow appliances for water conservation.

Specific measures that would be implemented to achieve the CALGreen standards would be identified during the Project's design. Typical methods that could be incorporated into the Project design's to improve energy efficiency and meet CALGreen standards include use of efficient building techniques, such as insulation in walls and roofs, and use of high-performance glazing; installation of energy-efficient appliances, such as kitchen appliances and laundry rooms; high-efficiency lighting; design that maximizes reliance on natural lighting; and reduced water consumption through methods such as low-flow fixtures (faucets, showers, toilets) and water-efficient landscaping and irrigation.

Table 6.6-2: Summary of Annual Energy Use during Operation, summarizes the estimated annual energy consumption from operations for the proposed Project with incorporation of the energy conservation and efficiency measures that were previously described. Operation of the proposed Project would result in a permanent increase in electricity and natural gas consumption. Furthermore, the building would be built in compliance with the CALGreen ordinance, including reducing water consumption by at least 20 percent.

The availability of electricity depends on adequate general capacity of the grid and sufficient fuel supplies. LADWP estimates that electricity consumption within the City will be approximately 22,425 GWh per year by 2023, the anticipated Project buildout year.[25] As shown in **Table 6.6-2,** the proposed Project would use 2,877,115 kWh per year, which is 0.013 percent of the 2023 forecasted demand. LADWP expects to have adequate electricity supply and transmission capability to meet the needs of its customers well beyond 2023. Because the proposed Project would use a low percentage of the total electricity demand projected for the future and LADWP anticipates it will have sufficient capability to meet future needs, construction and operation of the proposed Project would not require the expansion of existing facilities or the construction of new electricity-generating or transmission facilities.

Natural gas consumption would increase during Project operations. The 2018 California Gas Report indicates that sufficient capacity exists in the utility network to meet future demand in Southern California.

25 City of Los Angeles Department of Water and Power, 2018 Retail Electric Sales and Demand Forecast, November 5, 2018, Page 15, http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2019/04/2018%20Load%20Forecast_Final.pdf.

The total gas supply available in 2022, the latest year available, is estimated to be 2,519 MMcf per day,[26] equivalent to 2,569,380 million British thermal units (Btu) per year or 2,569,380,411 thousand Btu (kBtu).[27] As shown in **Table 6.6-2**, the proposed Project would use approximately 4,946,565 kBtu per year, which is 0.19 percent of the 2022 forecasted demand. Because the proposed Project would use a low percentage of the total natural gas demand projected for the future and SoCalGas anticipates it will have sufficient capability to meet future needs, construction and operation of the proposed Project would not require the expansion of existing facilities or the construction of new natural gas facilities.

Table 6.6-2
Summary of Annual Energy Use during Operation

Source	Units	Project	Existing	Net Difference
Electricity				
General Office Building	kWh/yr	0	383,205	-383,205
Apartments High Rise	kWh/yr	2,257,250	0	2,257,250
Parking structure	kWh/yr	363,320	0	363,320
Building Subtotal	kWh/yr	2,620,570	383,205	2,237,365
Indoor water use	kWh/yr	483,571	68,271	415,300
Outdoor water use	kWh/yr	260,152	35,702	224,449
Water Subtotal	kWh/yr	743,723	103,973	639,750
Electricity Total	kWh/yr	**3,364,293**	**487,178**	**2,877,115**
Natural Gas				
General Office Building	kBtu/yr	0	307,095	-307,095
Apartments High Rise	kBtu/yr	5,253,660	0	5,253,660
Parking structure	kBtu/yr	0	0	0
Natural Gas Total	kBtu/yr	**5,253,660**	**307,095**	**4,946,565**
Mobile				
Diesel	Gallons	24,434	4,198	20,235
Gasoline	Gallons	158,356	27,210	131,146

Source: Meridian Consultants, November 2019, ***Appendix D.***
Notes: kWh/yr = thousand kilowatt-hours per year, kBtu/yr = thousand British Thermal Units per year
Electricity and Natural Gas for the Project is total operational usage. Net difference, takes total Project usage and subtracts existing uses. Mobile gasoline and diesel usage was calculated using VMT which was provided by CalEEMod outputs.

26 California Gas and Electric Utilities, *2018 California Gas Report (2018).* Available at https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

27 *The Climate Registry,* "Table 12.1: U.S. Default Factors for Calculating CO2 Emissions from Fossil Fuel and Biomass Combustion" (April 2015), Available at https://www.theclimateregistry.org/wp-content/uploads/2016/03/2015-TCR-Default-EFs.pdf.

Although operation of the proposed Project would increase electricity and natural gas consumption, the Project would be designed and operated in accordance with the applicable State Building Code Title 24 regulations and City of Los Angeles Green Building code, which impose energy conservation measures. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy efficiency. Energy Commission staff estimates that the implementation of the 2016 Building Energy Efficiency Standards may reduce Statewide annual electricity consumption by approximately 281 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 16 million therms per year.[28] As such, impacts of the Project would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As stated above, the Project would be designed and operated in accordance with the with applicable State Building Code Title 24 regulations and City of Los Angeles Green Building code, which impose energy conservation measures. As such, the Project would not conflict with energy efficiency plans. Impacts would be less than significant.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts: The proposed project's implementation would not result in any new energy sources. As a result, no significant adverse cumulative impacts would occur.

Cumulative Impacts

Buildout of the Project, and related projects, would cumulatively increase the demand for energy. However, the Project would be consistent with growth expectations for the region utilized by energy providers to manage power generation and other facilities. As the Project is consistent with these forecasts, it would not make a considerable contribution to cumulative impacts on energy systems.

28 California Energy Commission, *2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (June 2015,* https://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf.

6.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?	☐	☐	☒	☐

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less than Significant Impact. A significant impact could occur if a project were located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to the City's General Plan, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.[29] Additionally, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, nor do any known active faults cross the Project site.[30] The closest potentially active fault is the Puente Hills Blind Thrust, located approximately one mile from the Project site. The potential risk for surface fault rupture through the Project site is considered low. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. Strong seismic ground shaking?

Less than Significant Impact. A significant impact could occur if a project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to

29 City of Los Angeles, *General Plan,* "Safety Element" (1996).

30 California Department of Conservation, *Regulatory Maps: Beverly Hills Quadrangle,* PDF Map, "Earthquake Zones of Required Investigation Beverly Hills Quadrangle," accessed July 2018, http://maps.conservation.ca.gov/cgs/informationwarehouse/.

seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project site is not located within a seismic hazard zone for land sliding or faulting; however, it is in a zone for liquefaction.[31] The site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. The Project would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Adherence to applicable building codes, agency guidance, and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground-shaking hazards that represent an increased risk associated with locations in the Southern California region. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. A significant impact could occur if a project site were located within a liquefaction zone and thereby were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure As stated in the City's General Plan "Safety Element," and as noted in the City's parcel information report, the Project site is located within an area identified as having the potential for liquefaction. The Project is an addition to an existing structure and would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

31 City of Los Angeles, Department of City Planning, *General Plan,* "Safety Element" (1996). Exhibit B.

iv. Landslides?

No Impact. A project-related, significant adverse effect could occur if the project were located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project site is on relatively level terrain and is not in a designated earthquake-induced landslide hazard zone.[32] There is also no risk of landslides from other causes. Therefore, the probability of landslides is considered to be low. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. Although development of the Project site has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. No grading is planned as part of the project. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the site; furthermore, the Project site would be almost entirely built upon, with little or no soil exposed. For these reasons, Project impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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?

Less than Significant Impacts. As previously discussed, the Project site is located within a liquefaction zone. The Project is an addition to an existing structure. Code requirements to prevent soil erosion and liquefaction would be implemented. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. For all these reasons, Project impacts would be less than significant.

32 California Geological Society, Earthquake Zones of Required Investigation, interactive map, accessed August 2018, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and that shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which includes building foundation requirements appropriate to site-specific conditions. Specifically, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Therefore, Project impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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. The Project site is in a developed area that is served by the wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. The Project's wastewater demand would be accommodated via connections to this existing wastewater infrastructure. No septic tanks or alternative disposal systems would be utilized. For all these reasons, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. A significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or geologic features that presently exist within the Project site. The Project site has been previously graded and is currently improved with an existing commercial retail building and related surface parking. No new grading would be required. While additional excavation of depths up to 30-feet will be necessary for new footings, excavation for the existing parking levels would likely have disturbed subsurface resources that may have been present. As such, the likelihood of unearthing unique paleontological resources is considered low. Furthermore, the Project Applicant would be required to comply with the City's standard condition of approval related to the inadvertent discovery of subsurface resources. In the event that any paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. With compliance with the condition of approval, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would add to an existing structure. Geotechnical impacts tend to be site specific and not additive. All development in the City (including the proposed Project and related projects) that involves ground-disturbing activities is required to comply with the City's codes and requirements for building design and construction management. As such, the Project would not make a considerable contribution to cumulative geology and soils impacts.

6.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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

Less than Significant Impact. A significant impact could occur if the Project: (1) would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment; or (2) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. Although scientists disagree as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that a direct link exists between increased emission of GHGs and long-term global temperature.

There are no federal, State, or local quantitative adopted thresholds of significance for addressing a residential project's GHG emissions. Although estimated GHG emissions have been quantified, the California Air Resources Board (CARB), SCAQMD, and the City of Los Angeles have yet to adopt quantitative, project-level significance thresholds for GHG emissions that would be applicable to the Project. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional state agency.

Operation

Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. This section addresses operational GHG emissions.

Area Sources

The area source GHG emissions included in this analysis result primarily from natural gas fireplaces with additional emissions from landscaping-related fuel combustion sources, such as lawn mowers. GHG emission due to natural gas combustion in buildings other than from fireplaces are excluded from area sources since they are included in the emissions associated with building energy use.

Consumer products are various solvents used in nonindustrial applications which emit Reactive Organic Gases (ROGs) during their product use. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. All land use buildings are assumed to be repainted at a rate of 10 percent of area per year. This is based on the assumptions used by SCAQMD. However, CalEEMod does not consider architectural coatings and consumer products to be sources of GHG.

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

Estimated emissions from the combustion of natural gas and other fuels from the implementation of the Project are calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for Southern California Edison were selected in CalEEMod. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

Mobile Sources Emissions

Vehicle trips generated by growth within the Plan area would result in operational emissions through the combustion of fossil fuels. O_2 emissions were determined based on the Project's daily trips (refer to **Section 4.17: Transportation and Traffic**. The vehicle miles travelled (VMT) takes into account internal and external trips. The City is served by multiple transit operators, specifically within the vicinity of the Plan area, with networks connecting different communities within and outside of City boundaries. The primary transit operator is Metrolink, which operates six commuter rail lines throughout Southern California. The Omnitrans Transit Agency provides local transit service throughout San Bernardino County, including within the City boundaries.

Solid Waste Emissions

Solid waste generation and associated emissions are calculated based on the square footage of the Plan Area, using default data found in CalEEMod for the proposed land uses. Disposal of organic waste in landfills can lead to the generation of CH4, a potent GHG. By generating solid waste, the Plan would contribute to the emission of fugitive CH4 from landfills, as well as CO2 and N2O from the operation of trash collection vehicles.

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project will result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on the square footage of the Plan Area, using CalEEMod data.

Emissions

Construction and operational GHG emissions were modeled using CalEEMod for each year of construction of the Project and for the typical year of operation. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions. The results of this analysis are presented in **Table 6.8-1: Proposed Project Greenhouse Gas Emissions**. As shown, when taking into account the removal of the existing uses, the net increase in GHG emissions generated by the Project would be 3,430 MTCO2e per year.

The City adopted the LA Green Plan to provide a Citywide plan for achieving the City's GHG emissions targets, for both the existing and future generations of GHG emissions. To further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code as it applies to new development projects.

Table 6.8-1
Project Operational Greenhouse Gas Emissions

GHG Emissions Source	Unmitigated	Regulatory Compliance	Reduction
	$MTCO_2e$/year		
Construction (amortized)	86	86	--
Operational (mobile) sources*	1,618	1,548	70
Area sources	10	10	--
Energy	1,745	1,696	49
Waste	132	40	92
Water	466	372	94
Annual Total	4,057	3,752	305 (9%)
Existing	*627*	*627*	--
Net Total	**3,430**	**3,125**	**305**

Source: CalEEMod.
*Notes: Emissions calculations are provided in **Appendix A**.*
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
$MTCO_2e$ = metric tons of carbon dioxide emissions.
** N2O emissions account for 0.03 MTCO2e/year.*

With respect to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines stricter GHG reduction measures available to development projects in the City of Los Angeles. Among the many GHG reduction measures outlined later in this section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; to meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and to meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate that it complies with the LA Green Building Code is considered consistent with Statewide GHG reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

The Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the AB 32, Senate Bill (SB) 375, and the LA Green Building Code. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. The goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. On September 8, 2016, Governor Brown enacted SB 32 that extends AB 32 another ten years to 2030 and expands upon the State's objectives. SB 32 calls on Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In addition, AB 197 requires CARB to approve a Statewide GHG emissions limit equivalent to the Statewide GHG emission level in 1990 to be achieved by 2030. SB 32 requires ARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

SCAG RTP/SCS 2016–2040

The 2016 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions of 9 percent by 2020 and 16 percent by 2035.[33] Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.[34]

The 2016 RTP/SCS would result in an estimate 8 percent decrease in per capita passenger vehicle GHG emissions by 2020, 18 percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21 percent decrease in per capita passenger vehicle GHG emissions by 2040. In March 2018, CARB adopted updated targets requiring a 19 percent decrease in VMT for the SCAG region by 2035. As the CARB targets were adopted after the 2016 RTP/SCS, it is expected that the updated targets will be incorporated into the next RTP/SCS. The 2016 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016 RTP/SCS would result in more complete communities with a variety of transportation and housing choices,

33 CARB, *Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31*.
34 SCAG, *Final 2016–2040 RTP/SCS,* April 2016, p. 153.

while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2016 RTP/SCS can be grouped into the following two categories: (1) integrated growth forecast; and (2) reduction of vehicle trips and VMT.

The 2016 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The population increase within the City between 2012 and 2040 was forecasted to be 763,900. As discussed in **Section 3.0** above, the construction of 570 new multifamily residential dwelling units would result in an estimated increase of approximately 1,077 new residents in the Bunker Hill and downtown area. This would yield to approximately 0.1 percent of the anticipated increased projected within the City. This increase would not result in population and housing growth that would cause growth within the City to exceed the SCAG population forecast.

As mentioned previously, the Project would meet the mandatory Green Building standards and exceed Title 24 requirements. These features are also consistent with the SCAG RTP/SCS MM-GHG-3(b) which requires a reduction in emissions resulting from a project features, design, or other measures. As such, the Project would be consistent policies listed in the SCAG RTP/SCS.

Sustainable Communities and Climate Protection Act (SB 375)

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. This act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035. In addition, SCAG's landfill capacity MM-USS-6(b) states that 75 percent of the waste stream would be recycled and waste reduction goal by 50 percent that are within responsibility set forth by the City.[35] As discussed previously, the Project would be within the population forecasts.

Green Building Standards (CALGreen) Code

In November 2008, the California Building Standards Commission established the California Green Building Standard Code (CALGreen Code), which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. As of January 1, 2011, the CALGreen Code is mandatory for all new building construction in the State. The

35 SCAG, *Mitigation Monitoring and Reporting Program*, Adopted April 2016, http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf.

CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code and is applicable to the construction of every new building, every new building alteration with a permit valuation of over $200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. In 2016, the Los Angeles City Council adopted the 2017 Los Angeles Green Building Code, which is in effect as of January 1, 2017. The 2017 Los Angeles Green Building Code contains mandatory measures for residential and nonresidential development related to site development; water use; weather resistance and moisture development; construction waste reduction; disposal and recycling; building maintenance and operation; pollutant control; indoor air quality; environmental comfort; outdoor air quality; and electric vehicle charging requirements. Furthermore, as mentioned above, the Project would reduce total energy consumption by 34 percent and would have a 75 percent of waste stream to be recycled.

City of Los Angeles Sustainable City pLAn

On April 8, 2015, the City of Los Angeles released the Sustainable City pLAn ("pLAn") which defines a roadmap for actions to be taken by the City over the next 20 years to create a City that is environmentally healthy, economically prosperous, and equitable in opportunity. The pLAn addresses increasing local water and solar energy resources, energy efficiency in new buildings, carbon and climate leadership and waste and landfills.

On carbon and climate leadership, the pLAn states that the City will reduce GHG emissions below the 1990 levels called for by state law by 2020. The City's objectives are to reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035 and 80 percent by 2050. By 2017, the City will develop a comprehensive climate action and adaptation plan. Strategies and policy initiative include creating a benchmarking policy for building energy use, and incentivizing or requiring LEED Silver or better for new construction.

The Project would be consistent with the planed land use and population growth within the area and would not conflict with the AQMP. Through required implementation of the LA Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation

of GHGs. Further, the Project would meet the 2016 Title 24, Part 6 Standard. As such, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

GHG emissions are cumulative in nature, as their impact is associated with global climate change. As such, the evaluation of Project impacts is also the determinant of whether a Project has a considerable contribution to cumulative effects. The analysis herein determined that the implementation of the proposed project would not result in any significant adverse impacts related to the emissions of greenhouse gases. As a result, the Project would also not have a considerable contribution to significant cumulative impacts.

6.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and

other acidic and alkaline solutions that would require special handling, transport, and disposal. However, all potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations. Residential uses involve the routine use of household products some of which contain small quantities of hazardous materials. However, the routine use and disposal of normal household products is not considered to create a significant hazard to the public or the environment. As such, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. However, it is expected that all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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. East College Prep, a charter school for grades 9-12, is located on the Project site. In addition, the American University Preparatory School is located approximately 40 feet west of the Project site across Figueroa Street No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for residential housekeeping, maintenance and other janitorial purposes would

be present at the Project site and use of these substances would comply with Health and Safety Code Section 25501(o). The Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

No Impact. A significant impact may occur if a project site is included on any Statewide list and poses an environmental hazard to surrounding sensitive uses. California Government Code Section 66962.5 requires various State agencies including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, to compile list 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.[36] Based on a review of these databases, the Project site is not located on a list of hazardous materials sites compiled pursuant to Section 65962.5. In addition, a Phase 1 Site Assessment, prepared for the Project Site, found no recognized environmental conditions associated with the site.[37] As such, no impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

e. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport or public use

36 These lists include, but are not limited to the 'EnviroStor' database (https://www.envirostor.dtsc.ca.gov/public/) and Geotracker list (https://geotracker.waterboards.ca.gov/)mainatained by DTSC and SWRCB respectively.

37 *Phase I Environmental Site Assessment, World Trade Center 350 South Fiqueroa Street*, AE West Consultants Inc, May 31, 2005

airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The closest public airports to the Project site are the Hollywood Burbank Airport, Santa Monica Airport, and Los Angeles International Airport (LAX). However, none of these airports are located within two miles of the Project site, nor is the site located in an airport land use plan or airport hazard area. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

f. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact.

The Project site is bound by Figueroa Street to the northwest, 3rd Street to the northeast, 4th Street to the southwe2st, and Flower Street to the southeast. Figueroa Street is a selected disaster route as identified by the City's General Plan.[38] While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures that could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. As discussed in Section 4.17, Transportation, the Project would implement a Construction Traffic Management Plan. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

38 *City of Los Angeles General Plan* "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

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

No Impact. The Project site is located in an urbanized area of Los Angeles that does not contain wildlands or high fire hazard terrain or vegetation. The Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[39] No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project and related projects would be subject to the same regulatory requirements. As stated previously, the Project site does not contain any recognized environmental conditions and the Project would not result in any significant impacts related to hazards and hazardous materials. As such, the Project would not have a considerable contribution to cumulative impacts.

39 City of Los Angeles Department of Planning, *Zone Information and Map Access System*, accessed July 2018, http://zimas.lacity.org/.

6.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on or off-site?	☐	☐	☒	☐
ii Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact. For the purpose of this specific threshold, a significant impact may occur if the project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems.

Construction Impacts

During construction and demolition activities stormwater runoff from the Project site could cause erosion and/or transport sediment off site and into municipal storm drain systems. Thus, pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in adverse impacts to water quality. The Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Operation Impacts

Operation of the proposed Project would introduce sources of potential stormwater pollution that are typical of commercial and residential uses. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would require a Low Impact Development (LID) Plan. The LID Plan is a document developed to control pollutants, pollutant loads, and runoff volume being released from the Project site by minimizing the impervious surface area and controlling runoff from impervious surfaces; it applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. The Project is expected to comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

The proposed Project would generate wastewater that would be conveyed via municipal sewage infrastructure maintained by the City of Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP), a public facility subject to the state's wastewater treatment requirements. The proposed Project

would generate wastewater similar to that generated by existing mixed-use buildings throughout the City with pollutant loads typical of urban wastewater already processed by the HTP. Thus, operation of the proposed Project would not violate waste discharge requirements.

Compliance with the LID Plan would reduce the amount of surface water runoff leaving the Project site compared to runoff under current conditions. Compliance with existing regulations, such as the LID Plan and MS4, including the implementation of BMPs, would ensure that operation of the proposed Project would not violate any water quality standards or waste discharge requirements. Construction and operation of the proposed Project would not violate any water quality standards or waste discharge requirements. As such, impacts would be less than significant,

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. A project could have a significant impact on groundwater level if it would change potable water levels sufficiently to (a) 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; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.[40]

The Project site is generally impervious with the exception of some portions of landscaping along the public rights-of-way. As such, surface water runoff from the Project site is directed to adjacent storm drains and generally does not percolate into the groundwater table beneath the Project site. The Project is not adjacent to a well field nor part of a groundwater recharge area. Furthermore, during nearby site investigations, groundwater was not encountered at depths of up to 100 feet.[41] As such, Project construction would not reach the groundwater level. As such, the Project Site is not a source of substantial groundwater recharge. Impacts would be less than significant

40 L.A. CEQA Thresholds Guide.

41 *Preliminary Geotechnical Assessment Proposed Residential Tower 350 South Figueroa Street Los Angeles California,* Geotechnologies Inc, December 2018 page 3

Mitigation Measures

No project-specific mitigation measures are necessary.

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 or through the addition of impervious surfaces, in a manner which would:

i. result in substantial erosion or siltation on or off site;

Less Than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on-or off-site. The Project Site is located in a highly urbanized area of the City. There are no natural watercourses on the Project Site or in the vicinity of the site. The Project Site is currently developed with impervious surfaces and the Project would also be completely impervious. As such, the drainage patterns would be the same as under the existing condition -- stormwater runoff would flow to the local storm drain system.

During construction, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The SWPPP would include best management practices (BMPs) and erosion control measures. The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

In addition, the Project would be required to implement a Low-Impact Development (LID) Plan which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPS to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period.

Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. The Project site is largely developed with impervious surfaces. Implementation of the Project would not increase site runoff or result in changes to the local drainage patterns. Implementation of a SWPPP for the Project would reduce the amount of surface water runoff after storm events because the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period in compliance with the City's LID Ordinance. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less than Significant Impact. A significant impact could occur if the Project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site, or if the Project would introduce substantial new sources of polluted runoff. Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the Project vicinity that have adequate capacity to serve the site. Currently, drains and catch basins maintained by the City are located on Hill Street, adjacent to the Project Site's southwestern boundary. Pursuant to local practice and City policy, stormwater retention would be required as part of the SWPPP during construction and LID implementation features during operation of the Project. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants from the subterranean parking garage and surface parking lot would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. The Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant. The Project would not result in a significant increase in site runoff or any changes in the local drainage patterns. Runoff from the Project site currently is, and would continue to be, collected on the site, and directed toward existing storm drains in the Project vicinity. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned

stormwater drainage systems or provide substantial additional sources of polluted runoff. With compliance with regulatory requirements Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

iv. impede or redirect flood flows?

No Impact. A significant impact could occur if the Project site was located within a 100-year flood zone, which would impede or redirect flood flows. The Project site is not in an area designated as a 100-year flood hazard area.[42] The Project site is located in a highly urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project; therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

No Impact. A significant impact would occur if the Project Site were sufficiently close to the ocean or other water body to potentially be at risk of seismically induced tidal phenomena (e.g., seiche and tsunami), or was within a flood zone, and if the Project Site utilized, stored, or otherwise contained pollutants that would be at risk of release if inundated. The Project Site is not located within a Tsunami Inundation Zone or Flood Zone.[43] Furthermore, the proposed use does not involve the storage or use of substantial quantities of potential pollutants that could be released during a flood event. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs), which govern the implementation and enforcement of the California Water Code and the Clean Water Act. The Project Site is located within Region 4, also known as the Los Angeles Region, (LARWQCB). The LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for

42 *City of Los Angeles General Plan Safety Element,* Exhibit F.
43 City of Los Angeles Parcel Profile Report, http://zimas.lacity.org.

the Coastal Watersheds of Los Angeles and Ventura Counties, September 11, 2014, is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Under the NPDES permit enforced by the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City of Los Angeles are subject to applicable local, State and/or federal regulations. The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. The Project would comply with and not obstruct implementation of the LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. As described earlier, the Project would comply with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring, and reporting program requirements, and general compliance determination criteria for groundwater discharges. The Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and in the City's LID ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures. Conclusion: The Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts: The potential impacts related to hydrology and storm water runoff are typically site specific. As discussed throughout the section, the Project would comply with existing regulations pertaining to hydrology and water quality and the implementation of the proposed project would not

result in any significant adverse impacts related to hydrology. As a result, no cumulative impacts are anticipated.

Cumulative Impacts

The Project is located in an urbanized area. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. New construction does not lead to substantial additional runoff, since new developments is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project the cumulative would not have a considerable contribution to cumulative impacts.

6.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Would the project physically divide an established community?

No Impact. A significant impact could occur if the Project were configured in such a way as to create a physical barrier within an established community. The Project site is located in an urbanized area and currently developed with office building and commercial building standing at 8 levels above podium and 5 levels above grade, respectively. The Project would be consistent with the scale, massing, character, and existing physical arrangement of the development in the vicinity of the Project site. Moreover, because the Project would consist of an infill development on any existing site that would replace a portion of an existing building, it would not divide an established community. Therefore, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact. A significant impact could occur if a project is inconsistent with planning or zoning designations currently applicable to the project site adopted for the purpose of avoiding or mitigating an environmental effect. The Project site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the designations and regulations of local land use and zoning plans, as summarized below, and associated. In addition, project implementation would not occur without the General Plan Amendment and Change of Zone proposed.

***City of Los Angeles General Plan*.** The land use component of the City of Los Angeles General Plan is set forth in the Framework Element and in Community Plans. The Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing,

urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The Project site is not within a designated district in the Framework. The Project is within the Central City Community Plan area, the Bunker Hill Specific Plan area, the Greater Downtown Housing Incentive Area, and is designated for Regional Center Commercial land use. The stated intent of the *Community Plan* is to enhance the positive characteristics of residential neighborhoods while providing a variety of housing opportunities. The *Community Plan* also aims to improve the function, design, and economic vitality of commercial areas, maximize development opportunities around existing and future transit systems, and preserve and strengthen commercial developments to provide a diverse job-producing economic base. The Project would develop a residential building in place of an office and commercial building and would therefore conform to the goals, objectives, and land uses identified in the *Community Plan* and the *General Plan* as listed below in **Table 6.11-1: City of Los Angeles Applicable General Plan Consistency**.

***SCAG Regional Transportation Plan/Sustainable Communities Strategy*.** As discussed in **Section 3.0** of this document, the Project would be consistent with policies set forth in SCAG's RTP/SCS.

***Zoning Regulations, Los Angeles Municipal Code*.** The Project site is zoned C4-4D (Commercial), which permits a range of commercial and residential uses by right and limits the FAR to 6:1 without restriction to building height. The Project would contain permitted uses and an FAR of 5.8:1.

As such, the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

As discussed, the Project would not result in any inconsistencies with plans, policies, or regulations. As such, the Project would not contribute to cumulative impacts.

Table 6.11-1

City of Los Angeles Applicable General Plan Consistency

Plan Objectives	Project Consistency
City of Los Angeles General Plan Framework	
Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents in the City.	**Consistent.** The proposed Project would provide new residential uses, in the City on top of existing other commercial uses. Therefore, providing additional households and commercial uses for residents and visitors to the City. As such, the Project would be consistent with this policy.
Objective 4.1: Plan the capacity for and develop incentives to encourage production for an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level for the future population to the year 2010.	**Not Applicable.** Though the Project would develop new housing units to meet future projected housing needs, this objective is outdated.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	**Consistent.** The proposed Project would provide new commercial uses on the ground floor, under residential uses above. It is located in Downtown Los Angeles
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost and within each City subregion to meet the twenty-year projections of housing needs.	**Consistent:** The Project would provide new housing units that would contribute to meeting the City's housing needs.
Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.	**Consistent.** As mentioned previously, the proposed Project would provide new residential uses, including a very low-income and moderate-income affordable housing units. This Project would expand the amount of affordable housing units in the City. As such, this Project would be consistent with this policy.

6.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

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

No Impact. The Project site has been developed with an existing structure and the Project would involve limited excavation. The Project site has not been utilized for mineral extraction. The Project site is not within an oil drilling district, state-designated oil field, or surface mining district.[44] There are no known oil wells at or near the Project site, nor is the site located within a Mineral Resource Zone 2 (MRZ-2) Area.[45] As such, no impacts would occur.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

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. As noted above, the Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project site is not delineated as a locally important mineral resource recovery site on a local general plan, specific plan, or other land use plan. No impacts would occur.

44 City of Los Angeles *General Plan*, "Conservation Element" (2001), *Mineral Resources Exhibit A*, January 2001.
45 City of Los Angeles, Department of City Planning, *Environmental and Public Facilities Map,* September 1996.

Mitigation Measures

Project Mitigation

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would have no impact on mineral resources. As such, the Project would not contribute to cumulative impacts to mineral resources.

6.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
e. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a. Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant with Project Mitigation. A significant impact could occur if a project would generate excess noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance).

Existing noise levels at four locations around the Project site were measured using a Larson-Davis Model 831 sound level meter, which satisfies the American National Standard Institute (ANSI) for general environmental noise measurement instrumentation and for Type 1 accuracy.[46] The sound level meter and microphone were mounted on a tripod 5-feet above the ground and equipped with a windscreen during all measurements. The sound level meter was set to "slow" time constant mode to record noise levels using the A-weighting filter network. The measured noise levels are shown in **Table 6.13-1: Existing Ambient Daytime Noise Levels in Project Site Vicinity**.

46 ASHA, "American National Standard on Classroom Acoustics," https://www.asha.org/public/hearing/american-national-standard-on-classroom-acoustics/.

Table 6.13-1
Ambient Noise Measurements

Location Number and Description		Noise Source	Leq (dBA)
1	Northeastern corner of S. Figueroa Street and W. 3rd Street intersection	Traffic	80.0
2	Southeastern corner of S. Figueroa Street and W. 4th Street intersection	Traffic	72.7
3	Southeastern side of S. Figueroa Street, mid-block in between 3rd Street and 4th Street	Traffic	70.6
4	Northeastern corner of S. Hope Street and W. 3rd Street	Traffic	65.8

Construction

A significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at any off-site, noise-sensitive location or construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dB(A) or more at any nearby noise-sensitive use, would also normally result in a significant impact. Noise sensitive uses are generally considered to be residences, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks.[47]

Construction of the proposed Project would require the use of equipment with the potential to generate noise above ambient background noise level. Noise levels would vary based on the amount and type of equipment being used, and the location of each activity.

The nearest noise-sensitive use, and also the nearest residential zone, is at Figueroa and 3rd Streets approximately 400 feet north of the Project. As indicated above, the ambient noise measured at the intersection of Figueroa Street and 3rd Street was 80.0 dB. Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dBA for each doubling of distance from the source to the receptor at acoustically hard sites, such roadways and buildings.[48] Therefore, at the sensitive receptor 400 feet away the construction noise from the Project would have attenuated by 18 dB from the levels measured at 50 feet. As such, construction equipment noise generated at the Project site would not significantly exceed ambient noise at the nearest noise sensitive receptor. Impacts would be less than significant.

47 City of Los Angeles, L.A. CEQA Thresholds Guide (2006), p. I.1-3.
48 USDOT FHWA, Fundamentals and Abatement, 97.

Operation

Roadway Noise

In order for a new noise source to be audible, there would need to be a 3 dB(A) or greater CNEL noise increase. The traffic volume on any given roadway segment would need to double during peak hours in order for a 3 dB(A) increase in ambient noise to occur. Because the Project would not double the existing traffic, the Project's mobile noise impacts can be assumed to be less than significant. As described in the Transportation Impact Report, the Project would not result in doubling the existing traffic counts on any of the analyzed intersections. As such, traffic-generated noise impacts would be considered less than significant.

Parking Structure Noise

Development of the Project would introduce parking lots associated with retail-commercial uses on the Project site. Generally, noise associated with parking lots is not of sufficient volume to exceed community noise standards based on the time-weighted CNEL scale. Parking lots can be a source of annoyance due to automobile engine start-ups and acceleration, and the activation of car alarms. Parking lots can generate Leq noise levels of between 49 dBA Leq (tire squeals) to 74 dBA Leq (car alarms) at 50 feet. As this is parking is enclosed within an existing, fully-screened concrete subterranean parking structure, noise associated with parking noise sources would be eliminated or at least substantially reduced at the nearest sensitive receptors. In addition, due to the existing level of traffic noise along area roadways, noise would not likely be audible due to the additional masking of traffic noise. As such, impacts would be less than significant.

Stationary Noise

New stationary sources of noise, HVAC equipment, would be installed in the proposed buildings at the Project site. The design of this equipment would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dB on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Would the project result in the generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. Vibration intensity is typically expressed as the peak particle velocity (PPV), defined as the maximum instantaneous peak of the vibration level, and measured in inches/second (ips). The general range of groundborne vibration extends from barely perceptible (0.006 ips) to severe (2.0 ips).

Construction activities for the Project have the potential to generate ground-borne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the Project could have an adverse impact on both sensitive structures (e.g., building damage) and populations (i.e., annoyance).

The City of Los Angeles has not adopted any thresholds associated with human annoyance for ground-borne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 0.2 ips at residences and other buildings where people normally sleep (e.g., nearby residences).[49] No thresholds have been adopted or recommended for commercial and office uses. The nearest residential structures are over 100 feet away from the Project site. Vibration attenuates with distance and construction-generated vibration levels would be less than 0.1 ips at any of the nearby residences. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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 could occur if a Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within

49 Caltrans, *Transportation and Construction Vibration Guidance Manual*, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf

or in the vicinity of a project site. There are no airports within a 2-mile radius of the Project site, nor is the Project Site within an area addressed by any airport land use plan. Further, the Project site is not near a private airstrip. As such, the Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project and other related projects are physically separated. Noise levels attenuate with distance. As such, on site noise from the Project, whether during construction or operation, would not cumulatively combine with noise from the site of the related projects. Off-site noise associated with the Project would consist of traffic noise from Project-related traffic. While the Project combined with the related projects would cumulatively increase area traffic, together they would not contribute to a doubling of traffic volumes throughout downtown Los Angeles. As such, they would not cause a noticeable increase in ambient noise. Therefore, the Project would not make a considerable contribution to a significant cumulative effect.

6.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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. A significant impact could occur if the Project would locate new development such as homes, businesses, and/or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude.

SCAG Regional Transportation Plan Sustainable Communities Strategy. In April 2016, SCAG adopted the 2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS).[50] As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every four years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region's sustainable future. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region. As discussed in **Section 3.0** of this SCEA, the Project would be consistent with the goals and strategies of SCAG's RTP/SCS. As such, it would not result in substantial indirect or induced unplanned population growth.

50 Southern California Association of Governments (SCAG), *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016;* http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

According to the Central City Community Plan, the average household size for occupied units in a high medium density-zoned residential area is 1.89 persons per unit.[51] The construction of 570 units would result in an increase of approximately 1,077 residents in the City of Los Angeles. The overall increase in housing units and population would be consistent with and well within the SCAG forecast of 316,700 additional households and approximately 550,100 people in the City of Los Angeles between 2008 and 2035. As such, the Project would not cause unexpected growth (i.e., new housing or employment generators). The Project would not accelerate development in an undeveloped area that exceeds growth projections that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan.

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

No Impact. A significant impact could occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would develop new housing on a site that is currently occupied by office and commercial towers, landscaping, and pavements. No displacement of existing housing or people would occur upon implementation of the Project. No impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project would not generate unplanned growth nor would it displace existing housing. As such, the Project would not make a considerable contribution to cumulative population or housing impacts.

51 City of Los Angeles, *Brentwood-Pacific Palisades Community Plan*, p.III-1, accessed September 2018, https://planning.lacity.org/complan/pdf/CCYCPTXT.PDF.

6.15 PUBLIC SERVICES

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

Impact Analysis

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

i. Fire Protection

Less than Significant Impact. A project would normally have a significant impact on fire protection if it requires a new or expanded fire station to maintain service and that new or expanded facility resulted in adverse physical effects. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. The maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.[52]

52 LAMC Section 57.09.07A.

The Project could potentially increase the demand for LAFD services. The Project site is served by LAFD Station No. 3, located at 108 North Fremont Avenue, approximately 0.25 miles north of the Project site.[53] Aa discuss in **Section 4.17 Transportation and Traffic**, the Project would not result in a significant change in traffic flow that could impede response times. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 3 to the Project site, fire protection response is considered adequate. As such, no new or expanded fire stations or other facilities would need to be constructed to serve the Project. Impacts would be less than significant.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire-flow requirements for different land uses and a minimum residual water pressure that must remain in the water system when during the required fire flow. LADWP has prepared a fire service pressure flow report that indicates that there is sufficient pressure to provide fire flow and residual pressure.[54] Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. Police Protection

Less than Significant Impact. For the purpose of this Initial Study, a significant impact could occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for police services anticipated at the time of completion and occupancy of the Project compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

A letter was sent to the LAPD to determine if the Project would result in any significant impacts to LAPD services and facilities. The following information was provided in the response letter received on December 13, 2018.

53 Los Angeles Fire Department, Station 3, accessed September 2018, https://www.lafd.org/fire-stations/station-3.
54 See **Appendix H**.

The Project site is located in the Central Community of the LAPD's Central Bureau.[55] The Central Community Police Station is located at 251 East 6th Street, approximately 1.2 miles and 6 minutes without traffic from the Project site. The Central Geographic Area is approximately 4.5 square miles and consists of 52 Reporting Districts. The service boundaries for the Central Area is as follows: Stadium Way, Pasadena Freeway to the North, Washington Boulevard, 7th Street to the South, Los Angeles River to the East, and the Harbor Freeway to the West. The officer to resident ratio is; 1 officer to 108 residents in the Central Area. Additionally, there are special service teams available within the LAPD to service the Central Area.

The Central Station's emergency response system is directly linked to the Los Angeles Police Department Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). Communication Division handles only policy related calls for the City.

The average response time to emergency calls for service in Central Area during 2018 was 2.8 minutes. The average response time for nonemergency calls for service in the Central Area during 2018 was 19.6 minutes.[56]

Implementation of the Project would result in an increase of residents and visitors on the Project site, thereby generating a potential increase in the number of service calls to the site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to minimally increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. This increase in service demand may require additional officers. However, the Central Community Police Station would not need to be expanded or relocated to accommodate the additional demand from the Project. Furthermore, any future new stations or other facilities would be subject to CEQA review. As such, no substantial adverse physical impacts would be associated with new or physically altered police facilities as a result of the Project. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

iii. Schools

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for school facilities which would exceed the capacity

55 Los Angeles Police Department, *Central Community Police Station*, accessed September 2018, http://www.lapdonline.org/central_community_police_station.

56 Correspondence from Michel Moore, Chief of Police, Los Angeles Police Department, December 2018.

of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for school services anticipated at the time of project completion and occupancy compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand; (c) 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 that would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by several LAUSD public schools, as shown in **Table 6.15-1: LAUSD Public Schools within the Project Area.** As shown in **Table 6.15-2: Project Estimated Student Generation,** the Project could generate approximately 94 elementary students, 26 middle school students, and 54 high school students, for a total of approximately 174 K-12 students, an incremental increase in student population. In addition, the Applicant would be required to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by statute to fully mitigate any potentially significant impact on schools. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Table 6.15-1
LAUSD Public Schools within the Project Area

School	Address	Distance from Project Site (miles)	Students Served
Para Los Ninos – Evelyn Thurman Gratts Primary Center	474 S Hartford Ave, Los Angeles, CA 90017	0.7	K-1
Castelar Street Elementary School	840 Yale St, Los Angeles, CA 90012	1.3	K-5
Gratts Learning Academy for Young Scholars (GLAYS)	309 Lucas Ave, Los Angeles, CA 90017	0.6	2-6
John H Liechty Middle School	650 S Union Ave, Los Angeles, CA 90017	1.0	6-8
Miguel Contreras Learning Complex	322 Lucas Ave, Los Angeles, CA 90017	0.5	9-12
Ramon C Cortines School of Visual & Performing Arts	450 N Grand Ave, Los Angeles, CA 90012	0.9	9-12
Belmont Senior High School	1575 W 2nd St, Los Angeles, CA 90026	0.9	9-12
Edward R Roybal Learning Center	1200 W Colton St, Los Angeles, CA 90026	1.0	9-12

Source: Los Angeles Unified School District, *Resident School Identifier* (2018); Correspondence from Rena Perez, Director, Los Angeles Unified School District Facilities Services Division, December 2018.

Table 6.15-2
Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Multifamily residences[a]	570 du	94	26	54	**174**

Source: Los Angeles Unified School District, School Facilities Needs Analysis (September 2012).
a Student generation rates are as follows for residential uses: 0.1649 elementary, 0.0450 middle, and 0.0943 high school students per unit.
Note: du = dwelling unit.

iv. Parks

Less than Significant Impact. The determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of

completion and occupancy of a project compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the 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 *Public Recreation Plan*, a portion of the Service Systems Element of the City of Los Angeles *General Plan*, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards.[57] The standard ratio of neighborhood and community parks to population is 4 acres per 1,000 residents within a 1- to 2-mile radius for neighborhood and community parks. The Project site is located within a highly urbanized area of the Central City community. There are approximately 75 parks and 51 recreation centers within a 5-mile radius of the Project.[58]

It is estimated that development of the Project would result in an increase of 1,077 new residents, and that these residents would increase the activity and frequency of use of these facilities.

The Project includes on-site open space amenities intended to serve the recreational needs of on-site residents, including approximately 61,300 square feet of common indoor and outdoor open space, which includes space for landscaping and approximately 1,900 square feet dedicated for private balconies. The ground floor would include indoor and outdoor seating areas, green spaces, and a residential lobby. The Level 6 podium deck would include a residential lobby and lounge; indoor gym and yoga studio; outdoor pool and spa; seating, lounge, dining, and barbeque areas; grass area and assorted green spaces; fire pit with additional seating; bocce ball court; and a new basketball court, in addition to an existing tennis court to remain. The Level 41 rooftop deck would include a synthetic grass area and green spaces; seating, lounge, dining, and barbeque areas; outdoor projector screen; and private residential garden.

Notwithstanding the availability of on-site recreational amenities, it is assumed that the future residents of the Project site would utilize recreation and park facilities in the surrounding area and generate additional demand for such amenities. Based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Project would generate a need for approximately 4.31 acres of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. In accordance with City Ordinance 184,505, the Project Applicant would be required to pay a fee for the purpose of developing park and recreational facilities to offset the Project's demand for

57 *City of Los Angeles General Plan,* "Service Systems Element."

58 City of Los Angeles Department of Recreation and Parks, *Facility Map Locator*, https://www.laparks.org/maplocator, accessed September 2018

parks and recreational facilities.[59] Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be offset to a level of less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

v. Other Public Facilities

Libraries

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries) that would exceed the capacity available to serve the Project site. The LAPL provides library services at the Central Library, eight regional branch libraries, 64 community branches and bookmobile units, with approximately 6.9 million books and other materials that compose the LAPL collection.[60] Library facilities within two miles of a Project site are generally considered to be within the service area of a Project.[61] The closest LAPL currently serving the Project site is the Central Library, located at 630 West 5th Street, approximately 830 feet southeast of the Project site. The Project site is also located within the service area of six other LALP Branch Libraries. The Little Tokyo Branch Library is located 0.68 miles from the Project site, the Chinatown Branch Library is located 0.92 miles from the Project site, the Echo Park Branch Library 0.93 miles from the Project site, the Pico Union Branch Library 1.46 miles from the Project site, the Edendale Branch Library 1.74 miles from the Project site and the Felipe de Neve Branch Library 1.8 miles from the Project site. The Project would introduce new residents to the site, however the population growth associated with the Project is within the growth projections for downtown Los Angeles. Impacts of the Project on library services would further be reduced as it is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Furthermore, the Project would be required to pay development impact fees. Therefore, given the existing library facilities with the surrounding area, and seeing as the Project site is within the service area of seven LAPL Branch Libraries, no new branches or facilities are projected to be needed to serve the surrounding community with the Project. Impacts would be less than significant.

59 City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3)

60 Los Angeles Public Library, Library Statistics, https://www.lapl.org/about-lapl/press/2013-library-facts. Accessed September 2018.

61 City of Los Angeles CEQA Thresholds Guide, Section K.5, page K.5-2 (2006).

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The proposed project's implementation will result in an incremental increase in the demand for police and fire service calls. The developer will be required to pay all pertinent development fees and to ensure that the site plans and project are consistent with the most recent fire codes and safety measures outlined by the Los Angeles Fire Department (LAFD) and the Los Angeles Police Department (LAPD). No new facilities would be required to accommodate the proposed use. As a result, no cumulative impacts are anticipated.

6.16 RECREATION

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

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. A significant impact could occur if a project includes 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. The determination of whether the Project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the 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 Project includes on-site open space amenities intended to serve the recreational needs of the residents, including approximately 61,300 square feet of common indoor and outdoor open space, which includes space for landscaping and approximately 1,900 square feet of private balcony space. Notwithstanding the availability of on-site recreational amenities, it may be assumed that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. However, the Project would include a range of on-site recreational amenities that would offset demand on surrounding public parks. Further, the Applicant is required by law to pay applicable fees regarding the availability of

existing park and recreation facilities within the area.[62] Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. A significant impact could occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The proposed Project would include recreational facilities, including a pool and space, basketball courts, and other outdoor amenities discussed previously. However, these recreational facilities would be integrated into the building, and thus do not represent separate potential impacts.

As previously mentioned, based on the standard parkland ratio goal of 4 acres per 1,000 residents, the Project would generate a need for approximately 4.31 acres of public parkland. This demand would be met through a combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. In accordance with City Ordinance 184,505, the Project Applicant would be required to pay a fee for the purpose of developing park and recreational facilities to offset the Project's demand for parks and recreational facilities.[63] Although the Project would place some additional demand on park facilities, the increase in demand would be met through a combination of on-site open space amenities and existing parks in the Project area. As such, the Project's increased demands upon recreational facilities would not by itself necessitate the construction of new recreation or park facilities, which might have an adverse physical effect on the environment. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The analysis determined the proposed project would not result in any potential impact on recreational facilities and services. As a result, no cumulative impacts on recreational facilities would result from the proposed project's implementation.

62 City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).
63 City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).

6.17 TRANSPORTATION AND TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

Less than Significant Impact. The following section summarizes and incorporates by reference information from the Transportation Study for the proposed 350 South Figueroa Project, dated July 2019, prepared by The Mobility Group, and included as **Appendix F** of this SCEA. The analysis therein was prepared in accordance with the assumptions, methodology, and procedures approved by the City of Los Angeles Department of Transportation (LADOT). The LADOT signed the Transportation Impact Study Memorandum of Understanding (MOU), included in **Appendix F**, which acknowledges that the Transportation Study was prepared in accordance with the latest version of LADOT's Transportation Impact Study Guidelines.

A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project such that the existing street capacity experiences a decrease in the existing volume-to-capacity (V/C) ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Trip generation estimates for the Project were calculated based on the latest edition of the Institute of Transportation Engineers' *Trip Generation* manual.[64] The Project is expected to generate a total of 965 net trips per day, including 105 morning peak-hour trips and 95 evening peak-hour trips. The report analyzed existing (2018) and future (2023, approximate end of construction) AM and PM peak-hour traffic

64 See **Appendix F** of this SCEA.

conditions at 13 critical intersections in the vicinity of the Project site. These locations, discussed with and agreed up by the LADOT, include key intersections along the primary access routes to and from the site, and are those locations expected to be most directly impacted by Project traffic.

The methodology used for analyzing intersections was based on the "Critical Movement Analysis (Planning Method)" as described in "Transportation Research Circular 212, Transportation Research Board, Washington D.C. 1980," and as required by LADOT's Traffic Study Policy and Procedures, to obtain volume/capacity (V/C) ratios for each intersection. LADOT has established criteria to determine if project impacts are significant at an intersection. According to these criteria, a project would have a significant after the addition of project traffic at an intersection if it is operating at LOS C and the incremental change in V/C ratio is equal to or greater than 0.040, if it is operating at LOS D and the incremental change in V/C ratio is equal to or greater than 0.020, or if is operating at LOS E or F and the incremental change in V/C ration is equal to or greater than 0.010. As shown in **Table 6.17-1: Existing Traffic Conditions Without and With Project—Intersection Level of Service, AM/PM Peak Hours** and **Table 6.17-2: Future Traffic Conditions Without and with Project—Intersection Level of Service, AM/PM Peak Hours**, no significant impacts were identified at any of the intersections evaluated. Construction related trips would be less than the number of trips identified to be generated by the Project and therefore construction traffic would also have a less than significant impact on level of service.

As described in the Traffic Study, the number of transit trips that would be generated by the Project was estimated to be 28 net additional transit trips in the AM peak hour and 25 additional trips in the PM peak hour. Based on capacity of the existing transit system serving the Project site, the Project would represent approximately 0.15% of the transit capacity during the peak hour. As such, the Project would not cause the capacity of the transit system to be substantially exceeded.

The project will improve the pedestrian experience by increasing sidewalk widths in compliance with the dimensions proposed in the Downtown Street Standards guide and the Bunker Hill Specific Plan. In addition, construction of the Project would implement the following Project Design Feature:

PDF-TRAF1: **A Construction Traffic Management Plan will be prepared for approval by the City prior to the start of construction, to incorporate the measures identified above, as well as a Worksite Traffic Control Plan to facilitate pedestrian bicycle and vehicular traffic movement, in order to minimize any potential impacts, and specifying the details of any sidewalk or lane closures. The Worksite Traffic Control Plan will be developed by the Applicant, and will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The Applicant will notify and consult with the two schools**

on the plan. The Worksite Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The plan will be reviewed and approved by LADOT prior to commencement of construction

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. CEQA Guidelines Section 15064.3(b) states that "vehicle miles traveled is the most appropriate measure of transportation impacts" and that "projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." The Project is within one-half mile of an existing major transit stop. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Table 6.17-1
Existing Traffic Conditions Without and With Project—Intersection Level of Service, AM/PM Peak Hours

			Existing		Existing Plus Project			
No	**Intersection**	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**Change in V/C**	**Significant Impact**
1.	Figueroa Street & 2nd Street	AM	0.639	B	0.640	B	0.001	NO
		PM	0.692	B	0.694	B	0.002	NO
2.	Figueroa Street & 3rd Street	AM	0.704	C	0.709	C	0.005	NO
		PM	0.673	B	0.674	B	0.001	NO
3.	Figueroa Street & 4th Street	AM	0.203	A	0.203	A	0.000	NO
		PM	0.231	A	0.234	A	0.003	NO
4.	Figueroa Street & 5th Street	AM	0.319	A	0.320	A	0.001	NO
		PM	0.476	A	0.480	A	0.004	NO
5.	Figueroa Street & 6th Street	AM	0.295	A	0.295	A	0.000	NO
		PM	0.366	A	0.369	A	0.003	NO
6.	Hope Street & 1st Street	AM	0.555	A	0.556	A	0.001	NO
		PM	0.659	B	0.665	B	0.006	NO
7.	Flower Street & 3rd Street	AM	0.649	B	0.652	B	0.003	NO
		PM	0.435	A	0.435	A	0.000	NO
8.	Flower Street & 4th Street	AM	0.498	A	0.508	A	0.010	NO
		PM	0.548	A	0.551	A	0.003	NO
9.	Flower Street & 5th Street	AM	0.245	A	0.257	A	0.012	NO
		PM	0.439	A	0.442	A	0.003	NO
10.	Flower Street & 6th Street	AM	0.235	A	0.237	A	0.002	NO
		PM	0.283	A	0.283	A	0.000	NO
11.	Grand Avenue & 5th Street	AM	0.318	A	0.318	A	0.000	NO
		PM	0.427	A	0.427	A	0.000	NO
12.	Olive Street & 5th Street	AM	0.363	A	0.363	A	0.000	NO
		PM	0.661	B	0.661	B	0.000	NO
13.	Hill Street & 3rd Street	AM	0.671	B	0.673	B	0.002	NO
		PM	0.592	A	0.598	A	0.006	NO

Table 6.17-2
Future Traffic Conditions Without and with Project—Intersection Level of Service, AM/PM Peak Hours

			Future without Project		Future Plus Project			
No	**Intersection**	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**Change in V/C**	**Significant Impact**
1.	Figueroa Street & 2nd Street	AM	0.756	C	0.765	C	0.009	NO
		PM	0.985	E	0.987	E	0.002	NO
2.	Figueroa Street & 3rd Street	AM	0.882	D	0.887	D	0.005	NO
		PM	0.862	D	0.863	D	0.001	NO
3.	Figueroa Street & 4th Street	AM	0.257	A	0.258	A	0.001	NO
		PM	0.345	A	0.350	A	0.005	NO
4.	Figueroa Street & 5th Street	AM	0.480	A	0.481	A	0.001	NO
		PM	0.689	B	0.693	B	0.004	NO
5.	Figueroa Street & 6th Street	AM	0.469	A	0.469	A	0.000	NO
		PM	0.607	B	0.609	B	0.002	NO
6.	Hope Street & 1st Street	AM	0.747	C	0.749	C	0.002	NO
		PM	0.882	D	0.887	D	0.005	NO
7.	Flower Street & 3rd Street	AM	0.786	C	0.790	C	0.004	NO
		PM	0.687	B	0.688	B	0.001	NO
8.	Flower Street & 4th Street	AM	0.618	B	0.629	B	0.011	NO
		PM	0.706	C	0.708	C	0.002	NO
9.	Flower Street & 5th Street	AM	0.372	A	0.376	A	0.004	NO
		PM	0.583	A	0.585	A	0.002	NO
10.	Flower Street & 6th Street	AM	0.415	A	0.418	A	0.003	NO
		PM	0.542	A	0.543	A	0.001	NO
11.	Grand Avenue & 5th Street	AM	0.477	A	0.477	B	0.000	NO
		PM	0.657	B	0.657	B	0.000	NO
12.	Olive Street & 6th Street	AM	0.632	B	0.632	B	0.000	NO
		PM	1.000	E	1.000	E	0.000	NO
13.	Hill Street & 3rd Street	AM	0.986	E	0.987	E	0.001	NO
		PM	1.006	F	1.011	F	0.005	NO

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

Less than Significant Impact. A significant impact could occur if a project includes new roadway design or introduces 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. Some existing driveways would be modified to enable access and egress for the proposed uses. The Project would not include any change in intersection or roadway design. The Project would not include unusual or hazardous design features. Impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Would the project result in inadequate emergency access?

Less than Significant Impact. A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project site or adjacent uses. Development of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Such closures would not be expected to interfere with emergency response or evacuation plans. As described previously, the Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. As stated above, under threshold 'a', the Project includes a project design feature to implement a Construction Traffic Management Plan and Worksite Traffic Control Plan. Furthermore, the Project would be subject to the site plan review requirements of both the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Traffic Study looked at cumulative traffic conditions and determined the Project would not have a considerable contribution to cumulative impacts. As a result, cumulative impacts would be less than significant.

6.18 TRIBAL CULTURAL RESOURCES

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

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with the cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

Less than Significant Impact. The Project site is currently developed with office uses and a subterranean parking lot. As described in **Section 4.5: Cultural Resources**, there are no known historic resources, including tribal resources, on the Project site that are listed or eligible for listing in the California Register of Historical Resources or the City of Los Angeles Historic-Cultural Monument List. Ground disturbances for the Project will occur during the proposed demolition, site preparation, and grading phases, estimated to require up to 30 feet of excavation below the surrounding street elevation. The potential for unidentified tribal cultural resources within the Project site is found to be low. The Project is subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which

requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, based on the condition of approval, any potential impacts would be reduced to less than significant. Further, the Project would not adversely affect any nearby resources that are listed or eligible for listing. Therefore, potential impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. Public Resources Code, Section 21080.3.1, establishes a formal process for Lead Agencies to consult with California Native American tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Section 20174 of the Public Resources Code. In compliance with the Code, the City sent notices to Native American tribes that are known to be traditionally and culturally affiliated with the Project area and have requested to be notified of projects.

The City received a response from the Gabrieleño Band of Mission Indians-Kizh Nation ("the Tribe") and consultation was initiated with representatives from the Tribe. No other responses were received. In addition, a records search was conducted at the California Historical Resources Information System (CHRIS).[65] The CHRIS search identified no previously recorded tribal cultural resources within a 1/2-mile radius of the Project site. Furthermore, excavation for the existing parking levels would likely have disturbed subsurface cultural resources that may have been present. As a result, the potential for unidentified tribal cultural resources within the project site is considered to be low.

The project would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources, which requires construction be halted and California Native American tribes be consulted on treatment. Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, based on the condition of approval, any potential impacts

65 *Tribal Cultural Resources Assessment*, 350 South Figueroa, World Trade Center, City of Los Angeles, California, SWCA Environmental Consultants, March 2019 included as **Appendix G** to this SCEA.

would be reduced to less than significant. Therefore, the project would have less-than significant impacts to tribal cultural resources.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Impacts related to Tribal Cultural resources tend to be site-specific and are assessed on a site by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's Conditions of Approval, Project impacts associated with Tribal Cultural resources would be less than significant. However, the occurrence of these impacts would be limited to the Project site and would not contribute to any potentially significant Tribal Cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not make a considerable contribution to potential cumulative impacts related to Tribal Cultural resources.

6.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonable foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact.

Water

Water service for the Project would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,000 miles of pipes, more than 100 storage tanks and reservoirs within the City, and 8 storage reservoirs along the Los Angeles Aqueducts. The Project is located in downtown Los Angeles that is served by an existing system of water lines. In accordance with the Department of City Planning requested that LADWP prepare a Water Supply Assessment (WSA). The Los Angeles Board of

Water and Power Commissioners adopted the WSA for the Project at their November 19, 2019, meeting. The WSA and associated resolution are included with this SCEA as **Appendix H**. As part of the WSA process, the Applicant committed to implement water conservation measures above those required by code, specifically:

- High Efficiency Toilets with a flush volume of 1.06 gallons per flush, or less.
- Showerheads with a flow rate of 1.75 gallons per minute, or less, for residential units only.
- ENERGY STAR Certified Residential Dishwashers standard with 2.9 gallons/cycle or less
- Drip/Subsurface Irrigation (Micro-irrigation)
- Proper Hydro-zoning/Zoned Irrigation-(groups plants with similar water requirements together)
- Artificial Turf
- Drought Tolerant Plants - approximately 75 percent of total landscaping

The Applicant shall also comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181899 and No.183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as feasible, pending final determination. Projected total net water demand increase for the Figueroa Project is estimated to be109 AF annually. This amount takes into account savings due to water conservation ordinances which are approximately 35 AFY, and savings due to additional voluntary conservation measures which are approximately 2 AFY.

As this is consistent with the demographic forecasts for the City, LADWP has determined that the additional water demand associated with the Project has been accounted for in LADWP's demand projections. LADWP has forecast adequate water supplies to meet all projected water demands in the City through the year 2040. LADWP therefore concluded it will be able to meet the proposed water demand of the Project.

Wastewater

The Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 million gallons per day (mgd), and has the capacity to treat 450 mgd.[66] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP. The Bureau of Sanitation, as part of a wastewater services information letter, has provided a wastewater estimate that the Project would generate 71,213 gpd of wastewater.[67] Given the available capacity of the HTP, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building

66 City of Los Angeles Department of Public Works, Bureau of Sanitation, "Wastewater System Fact Sheet" (2014).
67 See **Appendix H**.

Code requirements that would further reduce wastewater flow.

Stormwater

The Project Site is located in a developed portion of Los Angeles that is currently served by stormwater infrastructure. Prior to issuance of a construction permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit and a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the NPDES Permit. The SWPPP would identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. In addition, the Project would be required to demonstrate compliance with the Los Angeles Low Impact Development (LID) Ordinance standards. The primary purpose of the LID ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As such, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

Electric power, Natural gas, and Telecommunications

The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, natural gas, and telecommunications services. In the context of the greater Los Angeles service area and the growth forecasts used by utility service providers, the Project would not be a substantial source of new unplanned demand for electrical, gas or telecommunications services. New connections would be established for the Project which would be coordinated with the appropriate service provider and any trenching or other excavation within the public right of way would also be coordinated with the City Department of Public Works. The portion of the existing structure to be demolished does not contain electrical, gas, or telecommunications generation or transmission infrastructure that would need to be relocated off-site. As such, the Project would not require relocation of electrical, gas, or telecommunications facilities, the relocation of which could cause significant environmental effects.

Based on the above, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

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

Less than Significant Impact. 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. As discussed above, under threshold a, the LADWP has determined that it would be able to meet the proposed water demand of the Project as well as existing and planned future water demands of its service area during normal, dry, and multiple dry years.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. 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?

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the 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 (b) the 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. As stated above, the Hyperion Treatment Plant will have capacity to serve the Project. The Project would require new connections to the wastewater conveyance system, and as stated above, would increase the wastewater flow generated at the Project site. If the project exceeds the capacity of the wastewater conveyance system, the Project Applicant would have to fund the off-site improvements necessary to increase capacity to meet the Project's demand. As such, impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the 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 (SWMPP), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill.

It is currently unknown which landfill location will be used to deposit waste generated from the Project site. However, the County of Los Angeles Department of Public Works prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. As stated in the County's most recent report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. [68] The report utilized a UCLA Long Term Forecast of population and employment projections over the planning horizon of its annual waste management report, which currently extends to 2031 and predicts the County will grow from 10.3 million people in 2016 to 11.2 million in 2031, a slightly faster growth trend than SCAG's 2016–2040 RTP/SCS forecasts that predicts the County will reach 11.5

68 County of Los Angeles, Department of Public Works, *2017 Annual Report, Los Angeles Countywide Integrated Waste Management Plan*, April 2019, page 7.

million by 2040. As of December 2017, the total available capacity of the ten permitted landfills within Los Angeles County was 167.6 million tons, with a reported 2017 annual disposal of 10.5 million tons.[69]

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance.[70] As such, construction waste would be removed from the Project site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility.

As shown in **Table 6.19-3: Project Solid Waste Generation,** the Project would generate an estimated increase of approximately 2,103 pounds per day of solid waste. This estimate is conservative because it does not factor in any recycling or waste diversion programs. The permitted County landfills have adequate capacity to accommodate the increase in solid waste generated from the Project. Therefore, solid waste impacts would be less than significant.

Mitigation Measures

No project-specific mitigation measures are necessary.

Table 6.19-3
Project Solid Waste Generation

Type of Use	Size	Waste Generation Rate (lb./unit/day)	Total Solid Waste Generated (lb./day)
Multifamily Residential	570 du	4 lb./du/day[b]	2,280
Existing Office	*29,500 sq. ft.*	*0.006 lb./sq. ft./day*	*177*
Net Solid Waste Generation			**2,103**

Note: sq. ft. =square feet; du = dwelling units; lb. = pounds.
a CalRecycle, "Public Sector and Institutions: Estimated Solid Waste Generation Rates." (July 2018).
b CalRecycle, "Residential Developments: Estimated Solid Waste Generation Rates." (July 2018).

e. Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of retail and mixed-use residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would be less than significant.

69 County of Los Angeles, Department of Public Works, *2017 Annual Report, Los Angeles Countywide Integrated Waste Management Plan*, April 2019, Table E-1.
70 California Waste Services, https://www.californiawasteservices.com/los-angeles.html. Accessed July 2019.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

Utility service providers manage generation, treatment and disposal facilities based on forecasts of regional growth, which accounts for cumulative foreseen development. As the Project is consistent with these forecasts, it would not make a considerable contribution to cumulative impacts on utilities systems.

6.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

b. Due to the slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones.[71] The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or on going impacts to the environment?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.[72] As such, no impacts would occur.

Mitigation Measures

No project-specific mitigation measures are necessary.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, as previously discussed, the Project Site is not susceptible to potential flooding or landslide, nor would the Project result in potential drainage changes. As such, no impacts would occur.

71 City of Los Angeles, ZIMAS, "Parcel Profile Report," accessed July 2019, zimas.lacity.org.

72 City of Los Angeles DCP, *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

Mitigation Measures

No project-specific mitigation measures are necessary.

Cumulative Impacts

The Project is not located in or near state responsibility areas or lands classified as very high fire hazard zones. As such, the Project would not contribute to cumulative wildfire impacts.

6.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

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?

Less than Significant. The Project is located in a densely populated urban area and would have no significant impacts after mitigation with respect to biological resources and less than significant impacts to cultural resources. The Project would not degrade the quality of the environment, reduce, or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant with project mitigation.

Mitigation Measures

No mitigation measures are necessary.

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.)

Less than Significant Impact. A significant impact could occur if the Project, in conjunction with related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. In accordance with CEQA, the analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness." Cumulative impacts are addressed within each topical area above. As shown throughout this Initial Study, the Project would not have a cumulatively considerable impact. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are necessary.

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

Less than Significant with Project Mitigation. A significant impact could occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures noted**.** Impacts would be less than significant with project mitigation.

Mitigation Measures

Applicable mitigation measures noted previously in this Initial Study would be incorporated into the Project.