LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

1201 Grand Project

Case Number: ENV-2018-2955-EIR

Project Location: 1201-1215 S. Grand Avenue and 410 W. 12th Street, Los Angeles, California, 90015

Community Plan Area: Central City

Council District: 14—de León

Project Description: The Project consists of the removal of an existing three-story office building, the "Felix Chevrolet Building", identified as a potentially eligible historic resource, and surface parking lot, for the construction of a new 40-story high-rise mixed-use building with up to 312 residential units (approximately 323,529 square feet of residential floor area), approximately 7,100 square feet of retail/restaurant uses, a ground-floor public plaza, residential open space amenities, and three subterranean and six podium levels (above the ground floor) of parking, on a 25,433 square foot lot. The Project would excavate to a maximum depth of 40 feet below the existing ground surface, and result in the export of approximately 48,000 cubic yards of soil. All vehicular access would be provided via two driveways along an adjacent north-south alley located mid-block between Hope Street and Grand Avenue, on the west side of the Project Site. The Project would have a maximum height of up to 461 feet, and the proposed floor area ratio (FAR) would be approximately 13:1. The Project's total floor area would be approximately 330,629 square feet.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

APPLICANT:

Eco Tower, LLC

April 2021

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1 INTRODUCTION

An application for the proposed 1201 Grand Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration

is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including Project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration."

the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**1201 Grand Project**
ENVIRONMENTAL CASE NO.	ENV-2018-2955-EIR
RELATED CASES	CPC-2018-2954-TDR-SPR-MSC; VTT-82158

PROJECT LOCATION	**1201-1215 S. Grand Avenue and 410 W. 12th Street, Los Angeles, CA 90012**
COMMUNITY PLAN AREA	Central City
GENERAL PLAN DESIGNATION	High Density Residential
ZONING	[Q]R5-4D-O
COUNCIL DISTRICT	14-Kevin de León

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Jason McCrea
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Jason McCrea, Planning Assistant	April 21, 2021
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

the page or pages where the statement is substantiated

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project consists of the removal of an existing three-story office building, "the Felix Chevrolet Building," identified by SurveyLA as an individually eligible resource, and surface parking lot, for the construction of a new 40-story high-rise mixed-use building with up to 312 residential units (approximately 323,529 square feet of residential floor area), approximately 7,100 square feet of retail/restaurant uses, and up to 361 vehicle parking spaces, which would be contained in three subterranean and six podium levels above the ground floor. The depth of excavation for the subterranean parking levels would be approximately 40 feet below the existing ground surface. The Project would have a maximum height of up to 461 feet, and the proposed FAR would be approximately 13:1. The Project's total floor area would be approximately 330,629 square feet.

3.2 ENVIRONMENTAL SETTING

Project Location

The Project Site is located in the Central City Community Plan area of the City of Los Angeles, approximately 0.4 miles north of Interstate 10, approximately 0.5 miles east of State Route 110, and approximately 12 miles east of the Pacific Ocean. The Project Site is located at 1201-1215 S. Grand Avenue and 410 W. 12th Street (Assessor Parcel Nos. 5139-022-008 and 5139-022-009), and is bounded by Grand Avenue on the east, 12th Street on the north, and an alley on the west. Figures 3-1 and 3-2 provide a regional location map and an aerial map of the Project Site, respectively.

Existing Conditions

The Project Site has a General Plan land use designation of High Density Residential and is zoned [Q]R5-4D-O. The Project Site is currently developed with an approximately 44,769 square-foot office building (of which approximately 8,000 square feet is occupied) and an adjacent surface parking lot. The existing building ("the Felix Chevrolet Building") was identified in SurveyLA as individually eligible for historic designation. Both the three-story office building and the surface parking lot would be removed in conjunction with development of the Project.

Surrounding Land Uses

Some of the City's largest tourist attractions are located in close proximity to the Project Site. The Los Angeles Sports and Entertainment District (LASED), which includes the Los Angeles Convention Center, L.A. Live, and the Staples Center, spans multiple blocks (generally bounded by State Route 110, Chick Hearn Court, Figueroa Street, and Venice Boulevard) and is located approximately one-quarter mile west of the Project Site. The L.A. Live entertainment complex is located directly north of the Staples Center, just over one-quarter mile northwest of the Project Site. L.A. Live consists of multiple entertainment venues, including the Microsoft Theater and The Novo (formerly Club Nokia), as well as numerous retail, restaurant, and hotel uses.

Mid- and high-rise mixed-use developments are interspersed between low-rise commercial uses within the Project vicinity. Evo, a high-rise 23-story residential building with ground floor commercial uses is located at the northwest corner of Grand Avenue & 12th Street, immediately north of the Project Site. The G12 development, a seven-story residential mixed-use project with ground floor retail uses is located at the southeast corner of Grand Avenue & 12th Street, just east of the Project Site. Aven, a 37-story residential mixed-use tower is located at the northeast corner of Grand Avenue & 12th Street. Medical uses within the Project vicinity include the California Hospital Medical Center, located less than one-quarter mile south of the Project Site. Institutional uses near the Project Site include the Fashion Institute of Design & Merchandising campus and the Los Angeles Trade Technical College, located approximately one-third mile north and one-half mile south of the Project Site, respectively.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the removal of the existing office building and adjacent surface parking lot and the construction of a 40-story high-rise mixed-use building with up to 312 residential units (approximately 323,529 square feet of residential floor area), approximately 7,100 square feet of retail/restaurant uses, and up to 361 vehicle parking spaces, which would be contained in three subterranean and six podium levels above the ground floor. The depth of excavation for the subterranean parking levels would be approximately 40 feet below the existing ground surface. The Project would also include approximately 32,837 square feet of open space in addition to an approximately 1,052 square foot public plaza located at the corner of 12th Street and Grand Avenue (approximately 1,670 square feet including the sidewalk easement). The Project would have a maximum height of up to 461 feet, and the proposed FAR would be approximately 13:1. The Project's total floor area would be approximately 330,629 square feet. Figure 3-3 provides the Project's site plan.

3.3.2 Design and Architecture

The Project was designed in accordance with the Downtown Design Guidelines. The high-rise building form expressed in a tower/base configuration is of a contemporary architectural style consisting of a window wall system in glass and solid metal panels. The overall tower form is stepped back from the two main street frontages, but it grounds itself at the street corner where a corner plaza is provided and where the main entrance is located, thus providing a strong street presence. The podium base that consists of screened parking and residential levels with ground floor retail/restaurant uses is built to the property line to complement the urban street wall massing. The geometry of the tower itself is a symmetrical rectangular form articulated with stacked balconies that extend from the podium deck to the top floor, giving the building an aesthetic quality of good rhythm and clean design.

In accordance with the Downtown Street Standards, the Project provides a generous sidewalk width along Grand Avenue that promotes an inviting pedestrian experience, which allows for a well-defined walkway zone and parkways. Vehicular access and back-of-house uses were located

along the alley to be hidden from public view, and active ground floor treatments, such as a corner lobby and retail/restaurant frontage where outdoor dining may occur, has been incorporated in the design to provide a pedestrian-scaled experience.

Active outdoor spaces and indoor amenities are distributed throughout the Project. The main gathering space for residents, which consists of an outdoor pool and indoor lounge and fitness room, is located on the podium deck. There is also a rooftop lounge and terrace on the top floor for a more inviting resident amenity space that provides a 360-degree view of the city.

3.3.3 Open Space and Landscaping

As shown in Table 3-1, the Project would provide open space in excess of requirements. Based on the number of units and the mix of unit types, 36,250 square feet of open space would be required by the Los Angeles Municipal Code (LAMC). If the requested Director's Decision for 10% reduction in required open space is approved, 32,625 square feet of open space would be required. As shown in Table 3-1, a total of approximately 32,837 square feet of open space would be provided. Project amenities for the residential community include a landscaped roof deck and an indoor amenity space, outdoor and indoor lounge and recreation space, a fitness room, and swimming pool.

Table 3-1
Open Space

Open Space Required		
Use	**Amount**	**Total**
< 3 Habitable Rooms	126 units	12,600 sf
= 3 Habitable Rooms	178 units	22,250 sf
> 3 Habitable Rooms	8 unit	1,400 sf
Total Open Space Required		**36,250 sf**
Total Required After 10% Reduction Per Director's Decision		**32,625 sf**
Open Space Provided		
Use	**Total**	
Outdoor Open Space (Podium Deck and Roof Deck)	11,774 sf	
Indoor Open Space (Lounge Rooms and Fitness Room)	9,063 sf	
Private Open Space (Balconies)	12,000 sf	
Total Open Space Provided	**32,837 sf**	
Source: MVE + Partners, 2020.		

3.3.4 Access, Circulation, and Parking

Currently, vehicular access to the Project Site is provided by a driveway located along Grand Avenue and a driveway located along an adjacent alley. The Project proposes to provide all vehicular access via two full-access driveways along an adjacent north-south alley located mid-block between Hope Street and Grand Avenue, on the west side of the Project Site. Pico Boulevard and 12th Street would provide access to the Project driveways via the adjacent alley.

Pedestrian access to the Project Site would be provided from Grand Avenue and 12th Street. In addition, the Project would provide a 20-foot sidewalk along the Project's Grand Avenue frontage.

As shown in Table 3-2, the Project would be required to provide 359 parking spaces, and up to 361 spaces would be provided. The Project's parking would be located in three subterranean and six podium levels above the ground floor. Table 3-3 provides the requirements for short-term and long-term bicycle parking, and as shown, the Project would provide bicycle parking consistent with Code requirements.

Table 3-2
Vehicle Parking

Vehicle Parking Required		
Use	**Amount**	**Total**
Residential – Studio Units	12 units	12 spaces
Residential – 1-Bedroom Units	114 units	114 spaces
Residential – 1-Bedroom + Den Units	60 units	75 spaces
Residential – 2-Bedroom Units	118 units	148 spaces
Residential – 3-Bedroom Units	8 unit	10 spaces
Retail/Restaurant	7,100 sf	None Required
Total Vehicle Parking Spaces Required		**359 spaces**
Total Vehicle Parking Provided		**361 spaces**
Source: MVE + Partners, 2020.		

Table 3-3
Bicycle Parking

Bicycle Parking Required	
Use	**Total Spaces**
Short Term	
Residential	15 spaces
Retail/Restaurant	4 spaces
Total Short-Term Spaces Required	**19 spaces**
Long Term	
Residential	153 spaces
Retail/Restaurant	4 spaces
Total Long-Term Spaces Required	**157 spaces**
Bicycle Parking Provided	
Use	**Total Spaces**
Short Term	19 spaces
Long Term	157 spaces
Total	**176 spaces**
Source: MVE + Partners, 2020.	

3.3.5 Sustainability

The Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations).

3.3.6 Anticipated Construction Schedule

The anticipated construction schedule is approximately 33 months, with construction beginning in 2022 and the Project expected to become operational in 2025. Table 3-4, below, summarizes the estimated construction schedule that was used in the analysis contained in this Initial Study.

Table 3-4
Estimated Construction Schedule

Phase	Duration	Notes
Demolition	Months 1-2	4,367 tons of building and asphalt demolished and hauled in 16-cubic yard capacity trucks up to 40 miles away.
Grading (includes shoring)	Months 3-4	48,000 cubic yards of soil export hauled up to 40 miles away in 16-cubic yard capacity trucks.
Building Construction	Months 5-31	
Paving and Architectural Coatings	Months 32-33	
Source: DKA Planning, 2020.		

It is estimated that approximately 48,000 cubic yards of dirt would be exported from the Project Site.

Haul Route

Trucks would use the following haul routes, which are also shown in Figures 3-4 through 3-7:

- For trucks heading eastbound to the Nuway Arrow Landfill (clean soils), trucks would travel south on Grand Avenue to Pico Boulevard, west to Flower Street, to the I-10 freeway eastbound on-ramp.
- For trucks returning westbound to the Project Site, trucks would exit the I-10 freeway west to the Los Angeles Street exit, to 17th Street, west to Olive Street, north to 11th Street, west to Grand Avenue, and would travel south to the Project Site.
- For trucks heading northbound to the Chiquita Canyon Landfill (contaminated soils), trucks would travel south on Grand Avenue to Pico Boulevard, west to Flower Street, to the I-10 freeway eastbound on-ramp, to the I-5 freeway north.
- For trucks returning southbound to the Project Site, trucks would exit I-10 freeway west to the Los Angeles Street exit, to 17th Street, west to Olive Street, north to 11th Street, west to Grand Avenue, and would travel south to the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the

Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Transfer of Floor Area (TFAR) pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.6, a transfer of greater than 50,000 square feet of floor area, to allow for the transfer of up to 178,031 square feet of floor area, from the City of Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum of 330,629 square feet or a 13:1 FAR in lieu of the otherwise permitted 6:1 FAR;
2. Site Plan Review (SPR) pursuant to LAMC Section 16.05 for the addition of 50 or more residential units.
3. Director's Decision pursuant to LAMC Section 12.21 G.3 for an up to 10% reduction in the total required open space.
4. Vesting Tentative Tract Map (VTT) pursuant to LAMC Sections 17.06 and 17.15 for a merger and resubdivision of two lots into one master ground lot and 10 air space lots.
5. Haul route for approximately 48,000 cubic yards of export; and
6. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- None.

Legend

Project Site

Source: Google Maps, 2020.

Figure 3-1
Regional Map

Legend

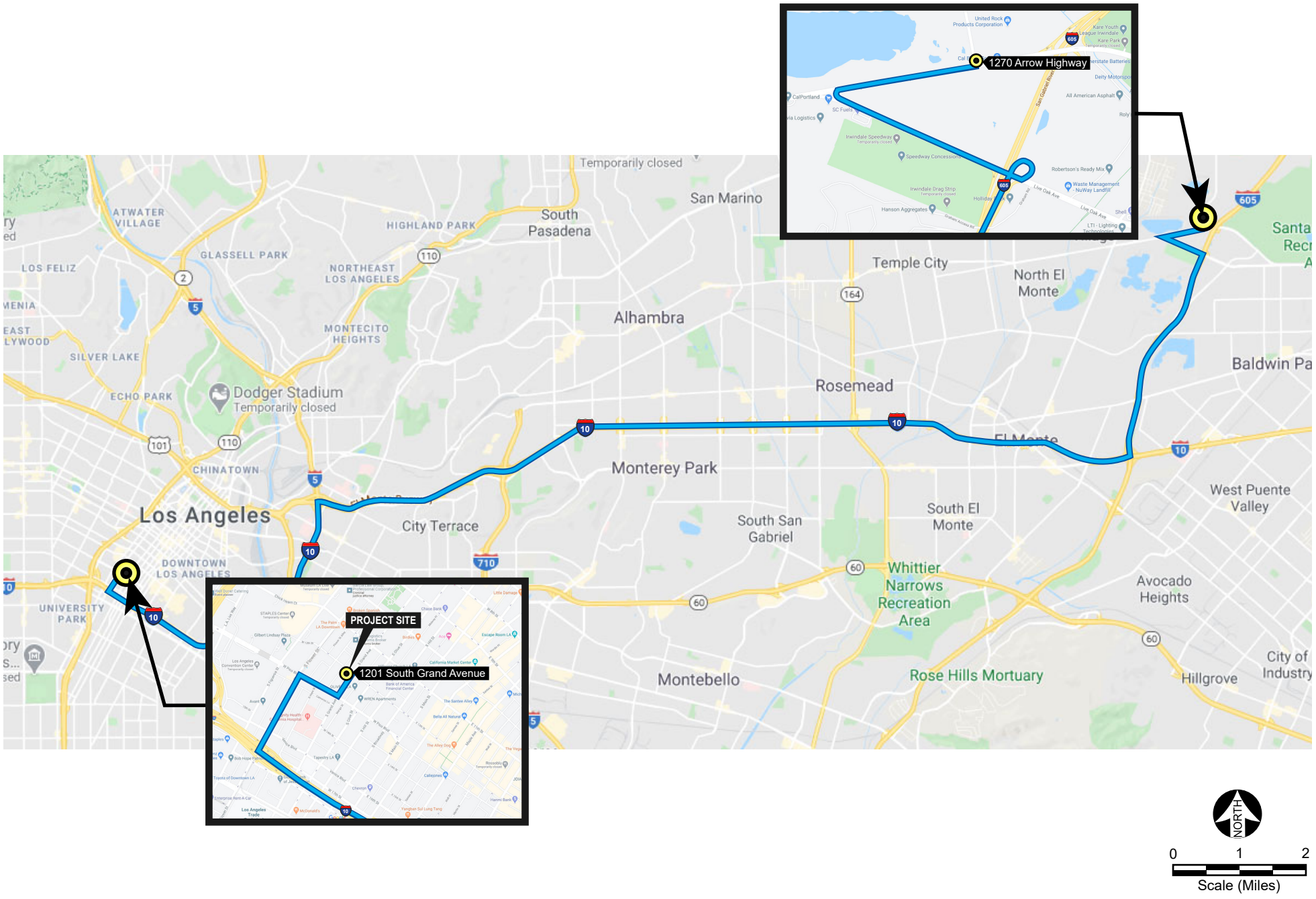
Project Site

Source: Google Maps 2020.

Figure 3-2
Aerial Map

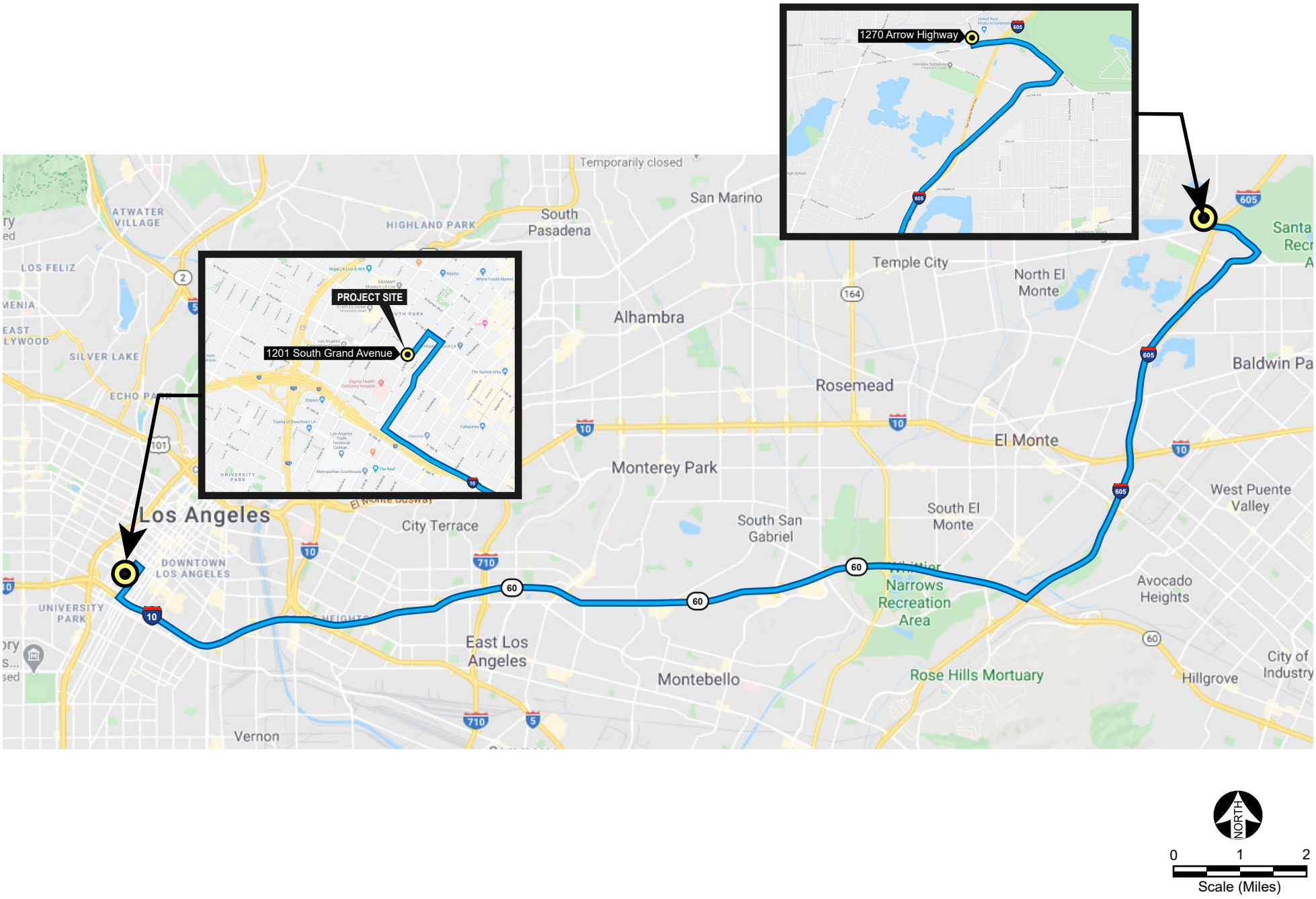
Figure 3-3
Site Plan - Ground Floor

Source: MVE+Partners., 2020.



Source: Google Maps, 2020.

Figure 3-4
Haul Route, Project Site to Nuway Arrow Landfill



Source: Google Maps, 2020.

Figure 3-5
Haul Route, Nuway Arrow Landfill to Project Site

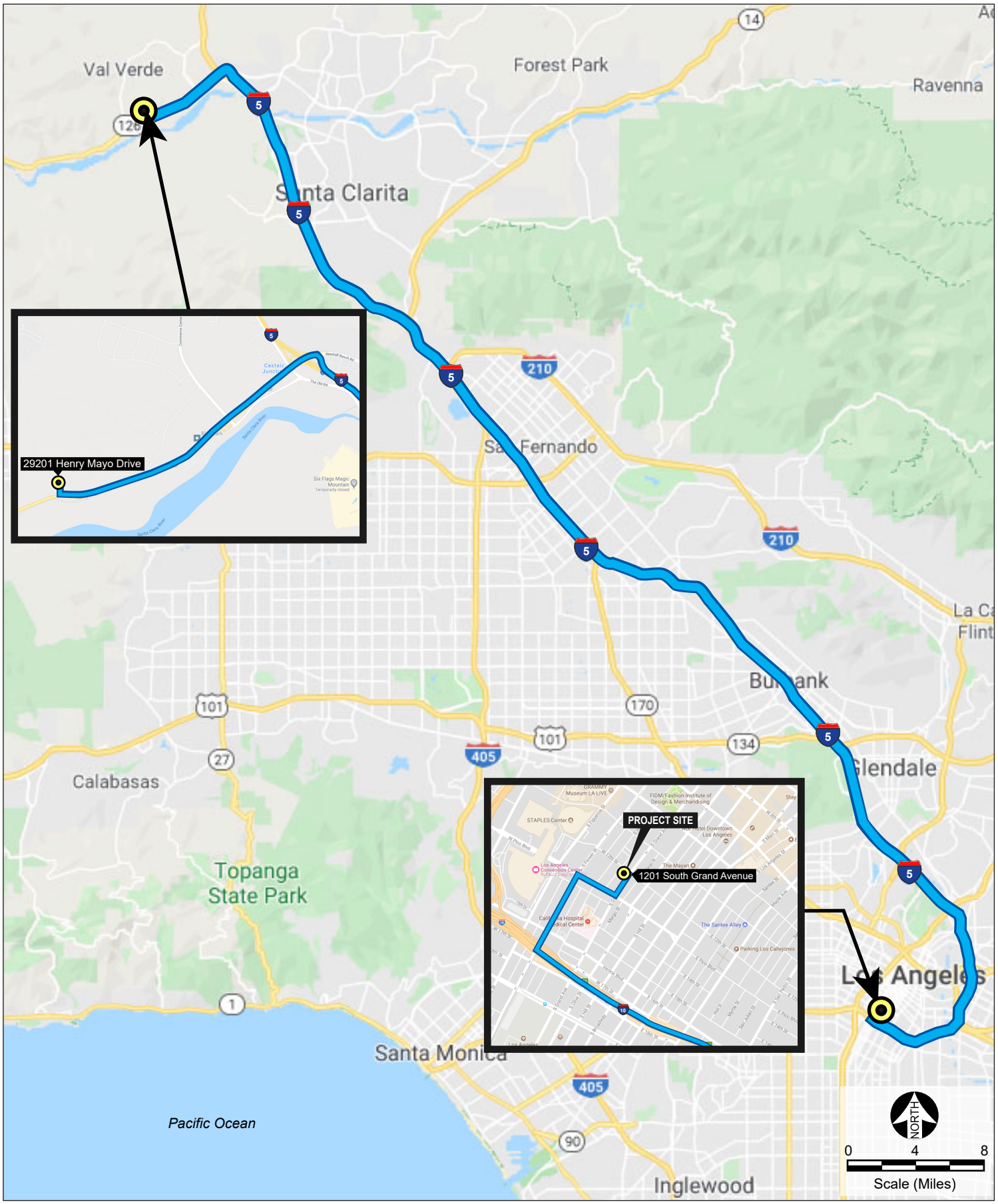


Figure 3-6
Haul Route, Project Site to Chiquita Canyon Landfill

Source: Google Maps, 2020.

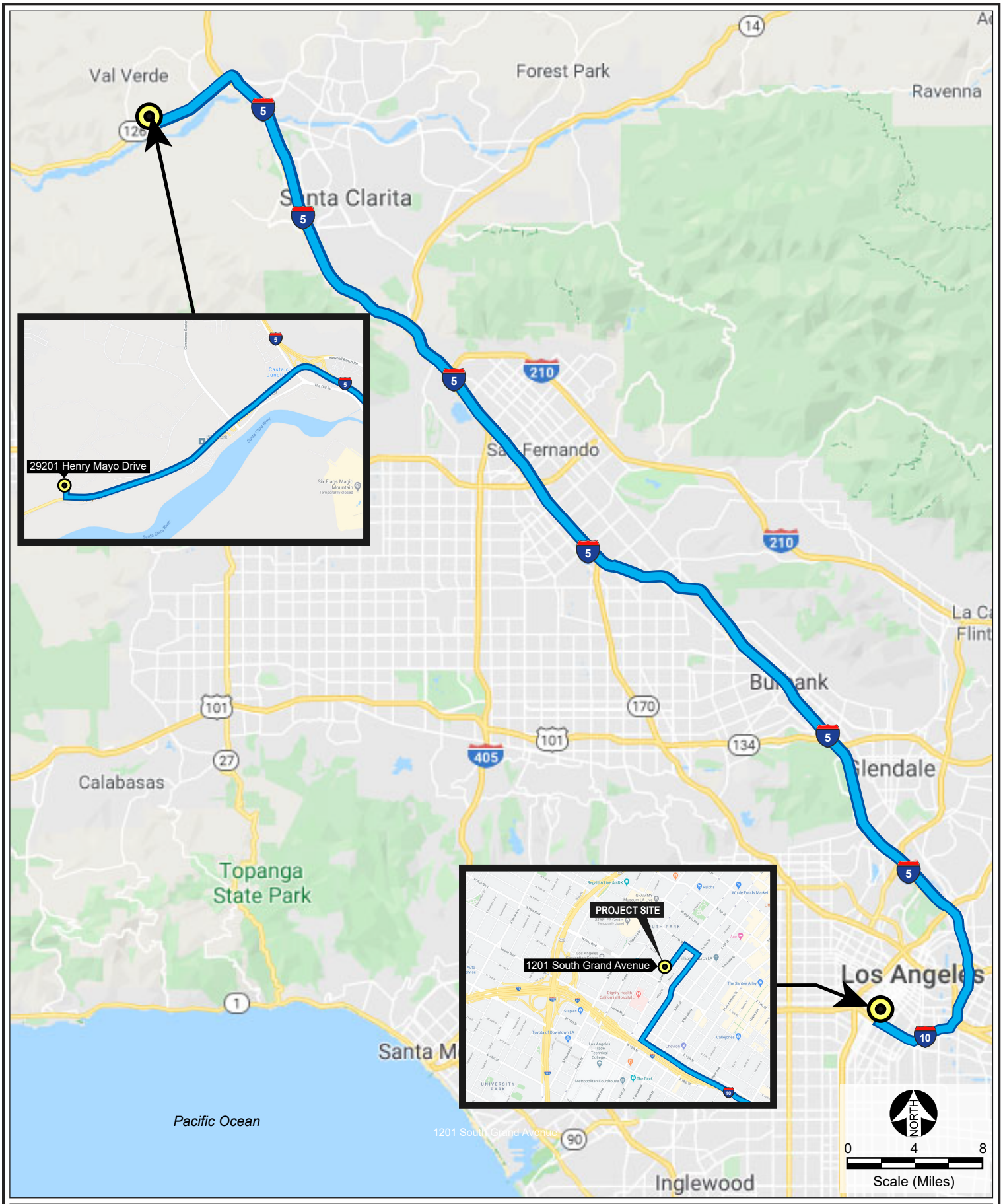


Figure 3-7
Haul Route, Chiquita Canyon Landfill to Project Site

Source: Google Maps, 2020.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within 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. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[2]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

2 City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In nonurbanized 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. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact would occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. As described in the City of Los Angeles CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural area, which provide a geographical orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, the ocean, or other water bodies. The Project Site is located in an urbanized portion of Los Angeles and is topographically relatively flat. The Project would construct a 40-story building with a maximum height of up to 461 feet. The Project is located in a highly urbanized area, situated among a variety of buildings in the immediate vicinity of the Project Site, and as such, the Project would contribute to downtown skyline views visible from public rights-of-way within the City and beyond its boundaries. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact with respect to scenic vistas. No further analysis is required.

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

Less Than Significant Impact. A significant impact would occur only where scenic resources within a state scenic highway would be damaged or removed by a project. The Project Site is not located within a state scenic highway.[3] The nearest state designated scenic highway is State Route 2, from I-210 to SR-138. Therefore, the Project would have a less than significant impact with respect to damaging scenic resources within a State-designated scenic highway, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. The Project Site is located within an urbanized area, and thus the following analysis will focus on whether the Project will conflict with any applicable zoning and/or other regulations governing scenic quality. As discussed below under "Land Use," with approval of the requested transfer of floor area (TFAR), as allowed by General Plan Footnote No. 3 and the existing zoning "D" limitation, the Project would be consistent with the General Plan designation and zoning for the Project Site. The Central City Community Plan does not have policies with regard to scenic quality. Pursuant to SB 743 and ZI 2452, Project operation would result in a less than significant impact with respect to the visual character or quality of the site or its surroundings, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible with the areas surrounding the Project Site or which pose a safety hazard, such as to motorists utilizing adjacent streets.

Artificial Light

An adverse impact would occur if a project created a substantial new source of artificial light that would adversely affect the surrounding area. Artificial light may be generated from individual (i.e., point) sources as well as from indirect sources of reflected light. Uses such as residences, hospitals, and hotels are considered light sensitive since they are typically occupied by persons who are subject to disturbance by bright light sources during evening hours. The Project Site is located in a well-lit urban portion of Los Angeles where there are high levels of ambient nighttime lighting including street lighting, architectural and security lighting, exterior signage, and indoor building illumination (light emanating from the interior of structures which passes through

[3] California Department of Transportation, List of Eligible and Officially Designated State Scenic Highways, https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx, accessed November 16, 2020.

windows), all of which are common to densely populated areas. The Project would introduce new light sources that are typical of mixed-use residential and commercial buildings in the Downtown area, including architectural lighting, interior lighting, wayfaring, and security lighting. Lighting from the Project would thus be consistent with surrounding urban lighting conditions. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact with respect to artificial light, and no further analysis of this topic in the EIR is required.

Glare

An adverse impact would occur if a project created a substantial new source of glare that would adversely affect day or nighttime views in the area. Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. In constructing a new tower, the Project would introduce new sources of glare. These sources of glare are those typically associated with mixed-use residential and commercial buildings in the Downtown area, including a large number of high rises with glass facades, and are thus anticipated to be consistent with surrounding urban buildings. Potential reflective surfaces in the Project vicinity that could be impacted include automobiles traveling and parked on streets in the vicinity of the Project, exterior building windows, and surfaces of buildings in the Project vicinity. All exterior windows and glass used on Project building surfaces would be non-reflective or treated with an anti-reflective coating to minimize glare. Pursuant to SB 743 and ZI 2452, the Project would result in a less than significant impact with respect to glare, and no further analysis of this topic in the EIR is required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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?

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from an agricultural use to a non-agricultural use. The Project Site is currently developed with an existing office building and surface parking lot, does not contain any agricultural uses, and is not delineated on any maps prepared pursuant to the Farmland Mapping and Monitoring Program.[4] Therefore, no impact would occur, and further evaluation of this issue in an EIR is not required.

[4] State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2006/los06.pdf , accessed May 1, 2020.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from an agricultural use to a non-agricultural use. The Project Site is currently zoned [Q]R5-4D-O for high-density residential uses, and no Williamson Act contract applies to the Project Site. Therefore, no impact would occur and further evaluation of this issue in an EIR is not required.

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

No Impact. A significant impact may occur if a project were to cause the rezoning of forest land or timberland. The Project Site is currently zoned [Q]R5-4D-O for high-density residential uses, and is not zoned for forest land or timberland. Therefore, no impact would occur, and further evaluation of this issue in an EIR is not required.

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or the conversion of forest land to a non-forest use. The Project Site is currently zoned [Q]R5-4D-O for high-density residential uses, and is currently developed with an existing office building and surface parking lot. The Project Site is not used as forest land, and therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur, and further evaluation of this issue in an EIR is not required.

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?

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use. The Project Site is currently developed with an existing office building and surface parking lot. The Project Site does not contain any agricultural or forest land. As such, the Project would not result in the conversion of Farmland to a non-agricultural use or the conversion of forest land to a non-forest use. No impact would occur and further evaluation of this issue in an EIR is not required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐

The analysis in this section is based on the following:

Appendix A Air Quality and Greenhouse Gas Emissions Analysis, DKA Planning, November 2020.

a. Conflict with or obstruct implementation of the applicable air quality plan?

Pursuant to the 2016 Air Quality Management Plan (AQMP), the South Coast Air Quality Management District (SCAQMD) has issued guidance on determining Project consistency with the AQMP. Consistency is based on the following:

- Would the project result in any of the following:
    - o An increase in the frequency or severity of existing air quality violations; or
    - o Cause or contribute to new air quality violations; or
    - o Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

- Would the project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; and
- To what extent is Project development consistent with control measures?

Less Than Significant Impact. The air quality plan applicable to the Project area is the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP is the South Coast Air Quality Management District's (SCAQMD) plan for improving regional air quality in the South Coast Air Basin (Basin). The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour Ozone (O_3) control plan with new commitments for short-term NO_X and Volatile Organic Compound (VOC) reductions. The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ National Ambient Air Quality Standards (NAAQS) for the Basin. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

As discussed in greater detail below under subsection (b), the Project's air quality emissions would not exceed any state or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in the Southern California Association of Government's (SCAG) 2016–2040 RTP/SCS regarding population, housing, and growth trends.[5] Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate

[5] As of September 3, 2020, the 2020 RTP/SCS is the adopted Regional Transportation Plan for the region. However, it has not been incorporated into the applicable AQMP for the region. As such, analysis of consistency with growth forecasts in the applicable plan (2016 AQMP) are against the 2016 RTP/SCS.

incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2016–2040 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 local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. As discussed in greater detail in Section XIV, Population and Housing, based on the LADOT VMT calculator, the Project is estimated to generate a residential population of 703 persons at full buildout, which would represent approximately 0.17 percent of the 425,500 additional residents forecasted by SCAG in the City of Los Angeles between 2020 and 2035 and would therefore be consistent with the projections in the AQMP.

When compared to the growth forecasts for the 2020-2045 RTP/SCS (Connect SoCal), the Project's 703 residents would represent approximately 0.10 percent of the forecasted population growth between 2020 and 2045. In addition, the Project's 28 employees would represent approximately 0.01 percent of the forecasted employment growth between 2020 and 2045. (See Table XIV-2 in the Population and Housing section.)

- Does the project implement feasible air quality mitigation measures?

As discussed below under Thresholds (b), (c), and (d), the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the AQMP control measures, as implemented by SCAG?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would serve to implement a number of land use policies of the City of Los Angeles, SCAQMD, and SCAG. The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate more housing within a high quality transit area (HQTA). "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code

and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

As demonstrated in the following analyses, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrate attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NO_X reductions from residential appliances. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project would generate 1,366 daily vehicle trips and 7,602 daily VMT, transportation outcomes that result in per capita travel levels less than 15 percent of the threshold for the Central Area Planning Commission. Specifically, the Project would result in a household VMT per capita of 5.6. This would meet and exceed the 2016-2040 RTP/SCS' objective of a 7.4 percent reduction in VMT per capita from 20.5 miles per person by 2040.

The Project Site has a land use designation of "High Density Residential," a classification that allows housing, retail, and restaurants, such as those proposed by the Project. As such, the RTP/SCS' assumptions about growth in the City accommodate housing and job growth on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. Therefore, Project impacts with respect to AQMP consistency would be less than significant, and further analysis of this issue in an EIR is not required.

City of Los Angeles Policies

The Project would offer residents, employees, and visitors substantial access to public transit and opportunities for walking and biking (including the provision of bicycle parking), thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the existing land use pattern in Downtown Los Angeles that concentrates urban density along major arterials and near transit options based on the following:

- The Project includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit with pedestrian-scale enhancements such two rows of streets trees on Grand Avenue, 20-foot wide sidewalks, and short-term bike racks. For pedestrians, Grand Avenue, Flower Street, Hope Street, and other major arterials near the Project Site are designated as Pedestrian Enhanced District street segments in the City's 2035 Mobility Plan.
- Bicyclists could take advantage of bicycle lane facilities on Grand Avenue (Class II bicycle lanes), as well as Class II bicycle lanes on Figueroa Street, Olive Street, 11th

Street, and Broadway. Future enhancements in the area are planned pursuant to the City's Bicycle Enhanced Network and Bicycle Lane Network.

- Transit services include eight providers, including 30 Metro local and Rapid bus routes, the Metro A Line and E line (closest stop at Flower Street and 12th Street, 640 feet to the west), 11 Los Angeles Department of Transportation Commuter Express services and two DASH shuttle lines, two Orange County Transportation Authority bus lines, and commuter services from four other municipal bus operators.
- The Project would also promote bicycle transportation by providing 157 long-term bicycle parking spaces and 19 short-term bicycle parking spaces.

The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in Table III-1, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

Table III-1
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**No Conflict.** The Project would minimize particulate emissions during construction through implementation of best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust) and therefore the Project would not conflict with this policy.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**No Conflict.** The Project would minimize particulate emissions from unpaved facilities through implementation of best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust) and therefore the Project would not conflict with this policy.
Policy 3.2.1. Manage traffic congestion during peak hours.	**No Conflict.** The Project is a low traffic generator because of the nature of residential land uses when compared to commercial, retail, and restaurant uses. The mixed-use nature of the Project would reduce gross vehicle trips generated by all land uses because of the ability to capture some trips to and from the proposed retail/restaurant uses. Further, the Project would also minimize traffic congestion based on its location in close proximity to multiple transit opportunities, which would encourage the use of alternative modes of transportation.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**No Conflict.** The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No Conflict.** The Project would promote public transit, active transportation, and alternative fuel vehicles for residents, employees, and visitors. There is substantial transit infrastructure in the vicinity, including 44 local

Table III-1
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	and commuter bus routes operated by eight transit providers and two Metro Rail lines within walking distance. The Project would also promote bicycle transportation by providing 157 long-term bicycle parking spaces and 19 short-term bicycle parking spaces. Grand Avenue has Class II bicycle lanes, as well as a robust sidewalk network for pedestrians. In addition, the Project would include pre-wiring for electric vehicle charging stations that could support continued penetration of zero-emission vehicles. Finally, the Project Site is also considered a "Very Walkable", with a WalkScore of 86 out of 100 points.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No Conflict.** The Project would support trip reduction strategies for residents, employees, and visitors. There is substantial transit infrastructure in the vicinity, including 44 local and commuter bus routes operated by eight transit providers and two Metro Rail lines within walking distance. The Project would also promote bicycle transportation by providing 157 long-term bicycle parking spaces and 19 short-term bicycle parking spaces. Grand Avenue has Class II bicycle lanes, as well as a robust sidewalk network for pedestrians. In addition, the Project would include pre-wiring for electric vehicle charging stations that could support continued penetration of zero-emission vehicles. Finally, the Project Site is also considered a "Very Walkable", with a WalkScore of 86 out of 100 points.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**No Conflict.** The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**No Conflict.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Source: DKA Planning, 2020.	

Because the Project is consistent with the applicable air quality plan (i.e., 2016 AQMP), it would not increase in the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the 2016 AQMP. Additional discussion about the Project's impact on existing air quality violations is discussed in the next section.

Likewise, the Project would not exceed the population, housing, and jobs assumptions utilized in preparing the AQMP's emissions inventories. The Project is not inconsistent with control measures and strategies in the 2016 AQMP, which largely target technological advancements in

controlling stationary source and mobile source emissions. As discussed below, Project construction and operational impacts would not be considered significant, and as such, no mitigation measures are required.

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?

Less Than Significant Impact.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Federal criteria air pollutants include carbon monoxide (CO), ground-level ozone (O_3), nitrogen oxides (NO_X), sulfur oxides (SO_X), particulate matter ten microns or less in diameter (PM_{10}), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead (Pb). State-only criteria pollutants include Visibility Reducing Particles, Sulfates (SO_4^{2-}), Hydrogen Sulfide (H_2S), and Vinyl Chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). These include Diesel Particulate Matter (DPM) and Volatile Organic Compounds (VOCs).

The Clean Air Act (CAA) requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table III-2. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as a nonattainment area for O3, PM2.5, and Pb.

Table III-2
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

[1]N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed February 2021 (www.arb.ca.gov/desig/adm/adm.htm).

Existing Conditions

Existing Health Risk in the Surrounding Area

Based on the MATES-IV model, the calculated cancer risk in the Project area is approximately 1,516 in a million (see Figure 4-1).[6] The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on Santa Monica Freeway (I-10), approximately 2,060 feet to the south and Pasadena Freeway (SR-110) 2,720 feet to the west). In general, the risk at the Project Site is higher than the average across the South Coast Air Basin.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 75-80th percentile, which means the Project Site has an overall environmental pollution burden higher than up to 80 percent of other communities within California.[7]

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The California Air Resources Board (CARB) has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Sensitive receptors within 1,000 feet of the Project Site include, but are not limited to, the following representative sampling (see Figure 4-2):

- G12 multi-family residences, 1200 South Grand Avenue, approximately 90 feet southeast of the Project Site.
- E on Grand multi-family residences, 1249 South Grand Avenue, approximately 200 feet southwest of the Project Site.
- Evo multi-family residences, 1155 South Grand Avenue, approximately 65 feet northeast of the Project Site.

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[6] SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-IV), Interactive Carcinogenicity Map, https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f, accessed May 8, 2020.

[7] Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0 MAP, https://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=4560cfbce7c745c299b2d0cbb07044f5, accessed May 8, 2020.

- Hope+Flower multi-family residences, 1201 South Hope Street, approximately 240 feet northwest of the Project Site.
- Dignity Health – California Hospital Medical Center, 1401 South Grand Avenue, approximately 960 feet southwest of the Project Site.

As summarized in Table III-3, most existing air quality emissions from the 8,000 square feet of office space come from the 57 daily vehicle trips traveling to and from the Project Site's driveway off Grand Avenue.[8] Other emissions come from area sources (e.g., consumer products, lawnmowers) and energy sources (e.g., natural gas combustion) that would not exist if the Project Site was undeveloped.

Table III-3
Existing Estimated Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	1	2	<1	<1	1
Net Regional Total	**<1**	**1**	**2**	**<1**	**<1**	**1**

Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs (included in Appendix A of this Initial Study).

[8] Raju Associates, Inc. Transportation Assessment Study for the 1201-1215 S. Grand Avenue and 410 West 12th Street Mixed-Use Project, May 2020.

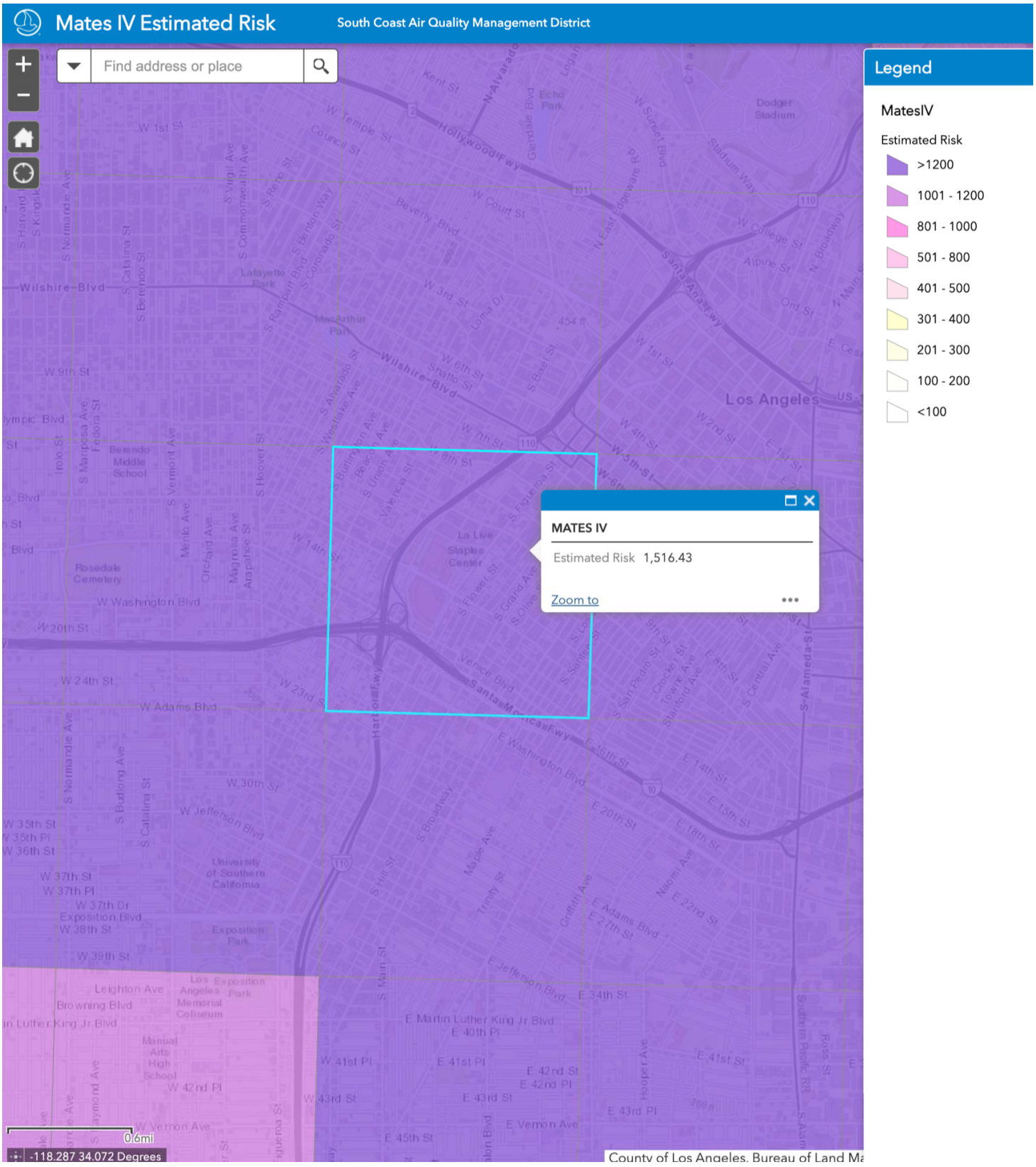

Figure 4-1
MATES IV Estimated Risk Map

Source: DouglasKim+Associates, LLC, 2020.

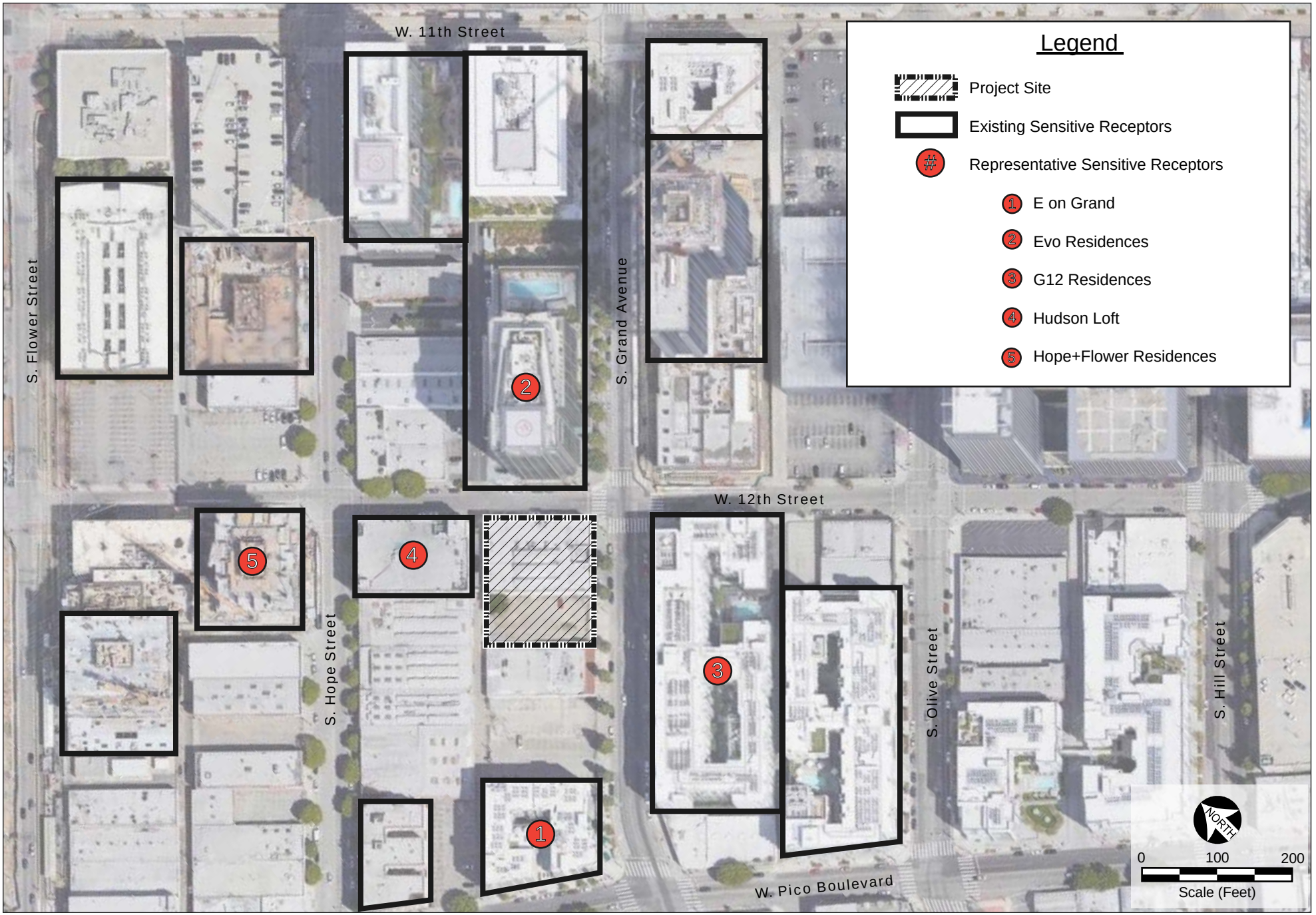

Figure 4-2
Sensitive Receptor Location Map

Source: DouglasKim+Associates, 2020.

Project Impacts

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD localized significance thresholds (LSTs) for NO_2, CO, and PM_{10} were initially published in June 2003 and revised in July 2008.[9] The LSTs for $PM_{2.5}$ were established in October 2006.[10] Updated LSTs were published on the SCAQMD website on October 21, 2009.[11] Table III-4 presents the significance criteria for both construction and operational emissions.

Table III-4
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions
	Regional	Localized /a/	
Volatile Organic Compounds (VOC)	75	--	55
Nitrogen Oxides (NO_X)	100	74	55
Carbon Monoxide (CO)	550	680	550
Sulfur Oxides (SO_X)	150	--	150
Respirable Particulates (PM_{10})	150	5	150
Fine Particulates ($PM_{2.5}$)	55	3	55

/a/ Localized significance thresholds assumed a 1-acre and 25-meter (82-foot) receptor distance in the Central LA source receptor area. The SCAQMD has not developed LST values for VOC or SO_X.
Source: SCAQMD.

Construction

The SCAQMD finds that if a project's construction emissions exceed the mass emissions thresholds listed above for any nonattainment pollutants, such an exceedance would contribute to a cumulatively considerable increase in emissions, resulting in a cumulative impact.[12] In such cases, a Project would substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2016.3.2 model using assumptions from the Project applicant, including the Project's construction schedule of

[9] SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

[10] SCAQMD, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

[11] SCAQMD, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009.

[12] SCAQMD Cumulative Impacts Working Group White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003; Appendix D, Cumulative Impact Analysis Requirements Pursuant to CEQA; D-3, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4

approximately 33 months. Table III-5 summarizes the estimated construction schedule that was modeled for air quality impacts.

Table III-5
Estimated Construction Schedule

Phase	Duration	Notes
Demolition	Months 1-2	4,367 tons of building and asphalt demolished and hauled in 16-cubic yard capacity trucks up to 40 miles away.
Grading (includes shoring)	Months 3-4	48,000 cubic yards of soil export hauled up to 40 miles away in 16-cubic yard capacity trucks.
Building Construction	Months 5-31	
Paving and Architectural Coatings	Months 32-33	
Source: DKA Planning, 2020.		

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities. NO_X emissions would primarily result from the use of construction equipment and truck trips. Diesel engines in trucks and equipment would contribute DPM, which contributes to PM emissions as well as TACs. During the building finishing phase, paving and the application of architectural

coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As stated above, it is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

As described previously, soils exported from the Project Site would be taken to either the NuWay Arrow Landfill (approximately 25 miles from the Project Site) or the Chiquita Canyon Landfill (approximately 40 miles from the Project Site). Therefore, this analysis conservatively assumes a single-trip haul distance of up to 40 miles. However, if a closer location is used, haul-related emissions during the demolition and grading phases would be lower for the Project than the emissions contemplated in this analysis.

As shown in Table III-6, construction of the Project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is therefore considered less than significant, and further evaluation of this issue in an EIR is not required.

Table III-6
Estimated Daily Construction Emissions - Unmitigated

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2022	3	57	28	<1	4	2
2023	3	26	26	<1	4	2
2024	3	25	25	<1	4	2
2025	53	57	31	<1	5	2
Maximum Regional Total	**53**	**44**	**31**	**<1**	**5**	**2**
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	**51**	**7**	**9**	**<1**	**1**	**1**
Localized Threshold	**--**	**74**	**680**	**--**	**5**	**3**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)
Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Modeling sheets included in Appendix A of this Initial Study.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[13] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2016-2018) for the Project area.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central Los Angeles SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the Evo residences 65 feet to the northeast of the Project Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in Table III-6, above**,** the Project would not produce emissions that exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant, and further evaluation of this issue in an EIR is not required.

A cumulatively considerable net increase would occur if the Project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time.

Construction of the Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impact on regional criteria pollutant emissions would be considered less than significant, and further evaluation of this issue in an EIR is not required.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive

[13] SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

receptors. The Project's traffic report identifies two nearby development proposals on the same block, with others further away:[14]

- 1323 South Grand Avenue, 700 apartments and ancillary uses, approximately 75 feet to the southwest of the Project Site.
- 1246 South Hope Street, 258 apartments and ancillary uses, approximately 65 feet across the rear alley.

Construction of the Project itself would not produce cumulatively considerable emissions of localized nonattainment pollutants PM_{10} and $PM_{2.5}$, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. Therefore, construction emissions impact on localized criteria pollutant emissions would be considered less than significant, and further evaluation of this issue in an EIR is not required.

If either of these adjacent related projects were to undertake construction concurrently with the Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of LST screening thresholds to these projects would help ensure that if a project were to exceed the screening thresholds, detailed dispersion modeling would be performed and any required mitigation would be implemented. Standard LST methodology would ensure related projects would not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Pursuant to the SCAQMD's policies discussed above, projects that do not exceed the project-specific significance thresholds from the SCAQMD are not considered cumulatively considerable. This and any related projects that would exceed LST thresholds (after mitigation) could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

There is an existing regional cumulative impact associated with O_3, NO_2, PM_{10}, and $PM_{2.5}$ because the Basin is designated as a State and/or federal nonattainment air basin for these pollutants. However, an individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions. As discussed above, construction and operational emissions would not exceed any applicable SCAQMD thresholds of significance.

With respect to the Project's construction-related air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As stated above, the Project would comply with applicable regulatory requirements, including the SCAQMD Rule 403 requirements. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Basin-wide would comply with these same regulatory requirements and would implement all feasible mitigation measures when significant impacts are identified.

[14] Raju Associates, Inc. Transportation Assessment Study for the 1201-1215 S. Grand Avenue and 410 West 12th Street Mixed-Use Project, May 2020.

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As shown in Table III-6, Project construction daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative construction-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant. Therefore, further evaluation of this issue in an EIR is not required.

Operation

Operational emissions of criteria pollutants would come from area sources and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 1,309 net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025.[15]

As shown in Table III-7, the Project's net emissions would not exceed the SCAQMD's regional or localized significance thresholds. The Project's operational impacts on long-term air pollution would be considered less than significant. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant, and further evaluation of this issue in an EIR is not required.

Table III-7
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	8	<1	26	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	2	6	15	<1	**5**	1
Regional Total	**10**	**8**	**41**	**<1**	**5**	**2**
Existing Sources	-<1	-1	-2	-<1	-<1	-1
Net Regional Total	**10**	**7**	**43**	**<1**	**5**	**1**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	**6**	**<1**	**24**	**<1**	**<1**	**<1**
Localized Significance Threshold	**N/A**	**74**	**680**	**--**	**2**	**1**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles source receptor area. Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs (included in Appendix A).						

[15] Raju Associates, Inc. Transportation Assessment Study for the 1201-1215 S. Grand Avenue and 410 West 12th Street Mixed-Use Project, May 2020. See page 2 and also Table 10.

As for cumulative operational impacts, the proposed land uses would not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. The Project would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. As shown in Table III-7, Project operational daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance, the Project's contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant. Therefore, further evaluation of this issue in an EIR is not required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. There are several sensitive receptors within 1,000 feet of the Project Site that could be exposed to air pollution from construction and operation of the Project. The sensitive receptors within 1,000 feet of the Project Site include, but are not limited to, the following representative sampling:

- G12 multi-family residences, 1200 South Grand Avenue, approximately 90 feet southeast of the Project Site.
- E on Grand multi-family residences, 1249 South Grand Avenue, approximately 200 feet southwest of the Project Site.
- Evo multi-family residences, 1155 South Grand Avenue, approximately 65 feet northeast of the Project Site.
- Hope+Flower multi-family residences, 1201 South Hope Street, approximately 240 feet northwest of the Project Site.
- Dignity Health – California Hospital Medical Center, 1401 South Grand Avenue, approximately 960 feet southwest of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in Table III-4, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table III-6, above, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating at the same time throughout most of the day. This methodology is more conservative and reflects a greater maximum emission total, as in all likelihood, all pieces of equipment in operation at once would rarely occur. Average daily emissions of on-site diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the total daily diesel PM emissions would not exceed SCAQMD LST thresholds, (provided in Table III-6), which would not result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 33 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant. Therefore, further evaluation of this issue in an EIR is not required.

Operation

The Project Site would be developed with residences and commercial uses (retail/restaurants), land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources

of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[16] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[17] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[18] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant, and further evaluation of this issue in an EIR is not required.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area.[19] Second, auto-related emissions of CO continue to decline because of advances

16 CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

17 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

18 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

19 Detailed CO microscale modeling was performed for the 2003 AQMP at the worst-case traffic intersections in the Basin that would likely experience the highest CO concentrations. Of these locations, the Wilshire Boulevard and Veteran Avenue intersection in Los Angeles experienced the highest CO concentration of 4.6 ppm, well below the 35 ppm one-hour federal standard.

in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[20]

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[21] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

The Project would generate 1,366 daily vehicle trips and 7,602 daily VMT, transportation outcomes that result in per capita travel levels less than 15 percent of the threshold for the Central Area Planning Commission. This would meet and exceed the 2016-2040 RTP/SCS' objective of a 7.4 percent reduction in VMT per capita by 2040. Therefore, the Project's operational impacts on local sensitive receptors would be less than significant, and further evaluation of this issue in an EIR is not required.

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

Less Than Significant Impact. The Project would not result in activities that create objectionable odors. The Project is a mixed-use development with housing and retail/restaurant uses that would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses, such as restaurants and residences. As a result, any odor impacts from the Project would be considered less than significant, and further evaluation of this issue in an EIR is not required.

[20] Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

[21] California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. www. http://oehha.ca.gov/public_info/facts/dieselfacts.html

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife 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 Wildlife 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?	☐	☐	☒	☐

The analysis in this section is based in part on the following:

Appendix B Tree Evaluation Report, Psomas, April 17, 2018.

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact would occur if a project would remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the state or federal regulatory agencies cited above. The Project Site is located in an urbanized area of Los Angeles and is currently developed with an office building and surface parking lot. The Project Site does not contain any natural open spaces, act as a wildlife corridor, nor possess any areas of significant biological resource value.[22] No hydrological features are present on the Site and there are no sensitive habitats present. Due to the urbanized nature of the Project Site and surrounding area, the Project Site does not support habitat for candidate, sensitive, or special status species identified in local plans, policies, regulations, by the California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), or the U.S. Fish and Wildlife Service (USFWS). Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the state and federal regulatory agencies cited would be adversely modified by a project. As discussed above, the Project Site and surrounding area are located in an urbanized setting. There are no riparian areas, sensitive natural communities, or Significant Ecological Areas as defined by the City of Los Angeles located on or adjacent to the Project Site.[23] Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project. Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.[24] Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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22 Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/, accessed November 19, 2020.

23 NavigateLA, Water, Lakes, and Streams layer: http://navigatela.lacity.org/navigatela/, May 1, 2020.

24 U.S. Fish & Wildlife Service, National Wetlands Inventory: http://www.fws.gov/wetlands/data/mapper.HTML

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

Less Than Significant Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with an existing office building and surface parking lot and currently does not interfere substantially with the movement of any native resident or migratory birds. The Project Site is located within an urban area that is highly disturbed and that does not contain any major water bodies that would contain or support habitat for native resident or migratory bird species. According to the tree report prepared for the Project Site (included as Appendix B to this Initial Study), there is one tree on the Project Site adjacent to the surface parking area, and there are two street trees located adjacent to the Project Site on Grand Avenue. During Project construction activities, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent that vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with existing regulatory requirements, impacts to nesting and migratory birds would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant adverse impact would occur if a project were inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Protected Tree Ordinance, as modified by Ordinance No. 177404. The amended Protected Tree Ordinance provides guidelines for the preservation of all Oak trees indigenous to California (excluding the Scrub Oak or *Quercus dumosa*) as well as the following tree species: Southern California Black Walnut (*Juglans californica var. californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*).[25] In addition, in December 2020, Mexican Elderberry (*Sambucus mexicana)* and Toyon (*Heteromeles arbutifolia)* were added to the class of "protected trees" (Ordinance No. 186873). According to the tree report prepared for the Project Site (included as Appendix B to this Initial Study), there is one tree (an Indian laurel fig, *ficus microcarpa nitida*) on the Project Site adjacent to the surface parking area. In addition, two street trees (both Canary Island pines, *Pinus canariensis*) are located adjacent to the Project Site along Grand Avenue. None of these trees are protected species under the City's Protected Tree Ordinance. The

25 City of Los Angeles, Ordinance No. 177404, effective April 23, 2006.

existing trees would be removed as part of Project construction and would be replaced according to the Urban Forestry Division requirements. As none of the trees located on the Project Site are protected trees, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. A significant impact would occur if a project would be inconsistent with policies in any draft or adopted conservation plan. The Project Site is located in an urbanized area of Los Angeles and is currently developed with an office building and surface parking lot. The Project Site is not located in or adjacent to an existing or proposed Significant Ecological Area.[26] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the Project Site. The Project would not conflict with any habitat conservation plans. Therefore, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The analysis in the following section is based in part on the following:

[26] NavigateLA, Significant Ecological Area layer: http://navigatela.lacity.org/navigatela/, May 1, 2020.

Appendix C Archaeological Resources Records Search, South Central Coastal Information Center, June 28, 2018.

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines defines historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

The existing building on the Project Site is not currently listed in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. However, as part of SurveyLA findings, the existing building was assigned a California Register status code of 3CS, which means "appears eligible for the California Register through a survey evaluation." The building was additionally assigned a status code of 5S3, which means "appears to be individually eligible for local listing or designation through a survey evaluation." The Project involves the removal of this building. Therefore, Project impacts with respect to historic resources could be potentially significant and will be analyzed further in the EIR.

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the Project was to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area of the Central City Community Plan Area of the City of Los Angeles, and the Project Site has been disturbed by past development activities. A records search was conducted with the South Central Coastal Information Center (SCCIC) to determine the likelihood for archaeological resources to occur at the Project Site (refer to Appendix C of this Initial Study). According to the SCCIC, the archaeological sensitivity of the Project Site is unknown. However, given the long history of the Project Site, buried resources may be present. The Project would require grading, excavation, and other construction activities to a depth of 40 feet, which could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

However, the City has established a standard condition of approval to address the inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey or report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

With implementation of the City's established condition of approval to address any inadvertent discovery of archaeological resources, Project impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic in the EIR is required.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. The Project Site is located in an urbanized area, and is developed with an existing office building and surface parking lot. As discussed above, no human remains are known to exist at the Project Site. Although unlikely, there is a possibility that human remains could be encountered during excavation and grading activities, which is a potential significant impact. Should human remains inadvertently be encountered, the Project would comply with the City's standard condition of approval for inadvertent discovery of human remains, which states the following:

> **Human Remains Inadvertent Discovery.** In the event that human skeletal remains 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, which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:
>
> Stop immediately and contact the County Coroner:
> 1104 N. Mission Road
> Los Angeles, CA 90033
> 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
> 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods as provided in Public Resources Code Section 5097.98. If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Compliance with the City's standard condition of approval described above would ensure appropriate treatment of any potential human remains discovered during demolition activities. Therefore, the Project's impacts on human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐

The analysis in this section is based on the following:

Appendix J-1 Fuel and Energy Calculations, CAJA Environmental Services, November 2020.

Appendix J-2 County Fuel Calculations, CAJA Environmental Services, November 2020.

a. 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. This analysis relies on Appendix F of the CEQA Guidelines, which was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix G and the *L.A. CEQA Thresholds Guide,* the following eight factors will be considered in determining whether this threshold of significance is met:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives;
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements; and
8. Whether the project conflicts with adopted energy conservation plans.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

1) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

Construction

Electricity

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction.

As shown in Table VI-1, a total of approximately 755 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Table VI-1
Summary of Energy Use During Project Construction

Energy Type	Quantity
Electricity	
Water Consumption	755 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power	N/A
Total Electricity	**755 kWh**
Transportation - Gasoline	
On-Road Construction Equipment	256,890 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	***256,890 gallons***
Transportation - Diesel	
On-Road Construction Equipment	313,345 gallons
Off-Road Construction Equipment	50,682 gallons
Total Diesel	***364,027 gallons***
Total Petroleum-Based Fuel	**620,917 gallons**
kWh = kilowatt-hours Detailed calculations are included in Appendix J of this Initial Study.	

The estimated construction electricity usage represents approximately 0.03 percent of the Project's estimated annual operational demand, which as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[27] Moreover, construction electricity usage would replace the electricity usage associated with the existing building. Overall,

[27] The percentage is derived by taking the total amount of electricity usage during construction (755 kWh) and dividing that number by the total amount of electricity usage during operation (2,270,102 kWh) to arrive at 0.03 percent.

construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

Construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities, and thus there would be no natural gas demand during construction of the Project.

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. The petroleum-based fuel use summary provided above in Table VI-1 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix J of this Initial Study. As shown, on- and off-road vehicles would consume an estimated 256,890 gallons of gasoline and approximately 364,027 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.005 percent of the 2017 annual on-road gasoline-related energy consumption and 0.06 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix J-2 of this Initial Study.

Energy Conservation

As shown in Table VI-1, above, a total of approximately 755 kWh of electricity is anticipated to be consumed during Project construction. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[28] In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and

[28] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, refrigeration, lighting, and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown on Table VI-2, the Project's net demand for electricity would be approximately 2,270,102 kWh per year. As shown on Table VI-3, the Project's net demand for natural gas would be approximately 4,430,810 kBTU per year.

Table VI-2
Project Estimated Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
Existing		
Office	8,000 sf	103,920
	Total	**103,920**
Proposed		
Residential	312 du	1,235,540
Retail/Restaurant	7,100 sf	313,394
Enclosed Parking	352,000 sf	825,088
	Total	**2,374,022**
	Less Existing	**103,920**
	Project Total	**2,270,102**

du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year
[1] Calculated via CalEEMod. Refer to Appendix A of this Initial Study.

Table VI-3
Project Estimated Natural Gas Demand

Land Use	Size	Total (kBTU/yr)[1]
Existing		
Office	8,000 sf	83,280
	Total	**83,280**
Proposed		
Residential	312 du	2,875,690
Retail/Restaurant	7,100 sf	1,638,400
Enclosed Parking	352,000 sf	0
	Total	**4,514,090**
	Less Existing	**83,280**
	Project Total	**4,430,810**

du = dwelling unit sf =square feet kBTU = 1,000 British Thermal Units yr = year
[1] Calculated via CalEEMod. Refer to Appendix A of this Initial Study.

Electricity

With compliance with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,270,102 kWh per year (refer to Table VI-2). In addition, by 2020, LADWP was required to procure at least 33 percent of their energy portfolio from renewable sources. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.[29] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would include the following sustainability measures as part of the Project:

Permanently Sustainable Site

- Mixed-use project in an urbanized and walkable area that is well-served by transit.
- Installation of covered storage facilities for security of bicycles for 15 percent or more of building occupants, in support of available alternative transportation.
- Installation of EV-capable parking for 30% of total parking spaces, in support of available alternative transportation.
- Installation of EV-Ready parking stalls for 10% of total parking spaces, also in support of available alternative transportation.
- Provision of heat island reduction strategies for 50 percent of hardscape, or 100 percent parking under cover. These strategies may include shade tree coverage, light colored materials with high reflectance value, and use of permeable pavement.

29 CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.

- Provision of heat island reduction strategies for roofing material. These strategies may include cool roofing in a light color with a minimum aged Solar Reflectance Index (SRI) or a vegetated roof.

Water Efficiency

- Implementation of strategies that reduce potable water consumption for irrigation from a calculated midsummer baseline case. These strategies may include low-flow or automatic fixtures.
- High Efficiency Toilets with a flush volume of 1.1 gallons or less per flush for the residential units, hotel rooms, and the residential common areas.
- Consortium for Energy Efficiency (CEE) Tier 2 front-load clothes washers in all residential units.
- Drought Tolerant Plants – 20% percent of total landscaping.
- Artificial Turf in select locations in residential outdoor amenity spaces, subject to LADBS approval of the required Request for Modification (RFM) to the current building code to allow the installation of select artificial turf in outdoor amenity areas.
- Drip/Subsurface Irrigation in select locations (Micro-Irrigation).
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Pool/Spa recirculating filtration equipment.
- Pool splash troughs around the perimeter that drain back into the pools.
- Leak Detection System for swimming pools and Jacuzzi.
- Installation of water meter on the pool make-up lines to monitor water use and identify leakage.
- Water-Saving Pool Filter.

Energy and Atmosphere

- Provision of fundamental commissioning of the building energy systems to verify the Project's energy-related systems are installed, calibrated and perform according to the owner's Project requirements, basis of design and construction documents.
- Provision of zero use of chlorofluorocarbon (CFC)-based refrigerants in new building heating, ventilating, air conditioning, and refrigeration (HVAC&R) systems.
- Provision for enhanced refrigerant management by selecting HVAC&R systems that minimize the emissions of compounds that contribute to ozone depletion and climate change.

Materials and Resource

- Installation of onsite storage and collection of recyclables (paper, cardboard, glass, plastic, and metal), in support of diverting occupant waste from the landfill.
- Implementation of a construction waste management plan to recycle and/or salvage of nonhazardous construction and demolition debris from landfills and incineration facilities.

Indoor Environmental Quality

- Use of building paints and coatings that comply with Green Seal Standard and SCAQMD's VOC limits.
- Use of building wood and agrifiber products within the weatherproofing line to contain no added urea-formaldehyde resins.

Based on LADWP's 2017 Power Strategic Long-Term Resource Plan (SLTRP), LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (encompassing the Project's 2025 buildout year) is estimated to be approximately 23,537 GWh of electricity.[30] As such, the Project-related increase in annual electricity consumption of 2,270,102 kWh per year would represent approximately 0.0096 percent of LADWP's projected sales in the 2025-2026 fiscal year.

Natural Gas

With compliance with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is projected to generate an increase in the on-site demand for natural gas totaling approximately 4,430,810 kBTU per year, or approximately 12,139 cubic feet (cf) per day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas's planning area will be approximately 2,422 million cf per day in 2025 (the Project's buildout year). The Project would account for approximately 0.0005 percent of the forecasted 2025 consumption in SoCalGas's planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City's Green Building Code to reduce energy usage.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As shown in Table VI-4, below, vehicles associated with operation of the Project would consume approximately 179,059 gallons of gasoline and approximately 63,380 gallons of diesel fuel per year. For comparison purposes, the fuel usage during Project construction would represent approximately 0.004 percent of the 2017 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix J-2 of this Initial Study, which uses information from CARB's EMFAC model.

30 2017 Power Strategic Long-Term Resource Plan, December 2017, LADWP, Appendix A.

Table VI-4
Summary of Project Estimated Fuel Consumption During Operation

Energy Type	Quantity
Transportation - Gasoline	
Gasoline Use	179,059 gallons
Total Gasoline	***179,059 gallons***
Transportation - Diesel	
Diesel Use	63,380 gallons
Total Diesel	***63,380 gallons***
Total Petroleum-Based Fuel	**242,439 gallons**
kWh = kilowatt-hours Detailed calculations are included in Appendix J of this Initial Study.	

As noted previously, the Project Site is located in an HQTA designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area. Transit service in the Project area includes eight providers, including 30 Metro local and Rapid bus routes, the Metro A Line and E Line (closest stop at Flower Street and 12th Street, approximately 640 to the west of the Project Site), 11 LADOT Commuter Express services and two DASH shuttle lines, two Orange County Transportation Authority bus lines, and commuter services from four other municipal bus operators. Thus, the existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for Project residents and guests.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order to provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments. The LADOT VMT calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Section VIII (Greenhouse Gas Emissions), the Project results in an approximately 71 percent reduction in VMT when compared to SCAG's per capita projections (see Table VIII-8), and would result in a corresponding reduction in transportation fuel consumption.

2) The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated above, the Project-related increase in annual electricity consumption would represent approximately 0.0096 percent of LADWP's projected sales in 2025-2026. Also, the Project's estimated increase in demand for natural gas would account for approximately 0.0005 percent of the forecasted 2025 consumption in SoCalGas's planning area. In summary, energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's and SoCalGas's service provisions.

3) The effects of the project on peak and base period demands for electricity and other forms of energy.

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[31] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.[32] In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.004 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.[33] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) The degree to which the project complies with existing energy standards.

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage during Project operations presented on Table VI-2 and VI-3 would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code.

[31] LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

[32] Ibid.

[33] Ibid.

Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2017 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[34] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[35] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operational activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[36] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

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[34] California Gas and Electric Utilities, 2017 California Gas Report, 2017.

[35] U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed February 2019.

[36] BP Global, Oil reserves, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed February 2019.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Furthermore, while the Project Site is located in a Methane Zone, and while methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[37]

6) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As shown in Table VI-4, above, vehicles associated with operation of the Project would consume approximately 179,059 gallons of gasoline and approximately 63,380 gallons of diesel fuel per year. For comparison purposes, the fuel usage during Project construction would represent approximately 0.004 percent of the 2017 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix J-2 of this Initial Study, based on information from CARB's EMFAC model. In addition, the Project's design and proximity to job centers and other commercial, retail, and entertainment uses would allow for more residents to live closer to work, shopping, and sources of entertainment, reducing associated VMT. The design of the Project, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, would also encourage non-automotive forms of transportation such as walking or biking to destinations. In addition, extensive public bus and rail transit service is provided within the Project area.

7) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the

[37] CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed May 7, 2019.

Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy- intensive process. Thus, through compliance with the City's solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

8) Whether the Project conflicts with adopted energy conservation plans.

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed previously, the 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020-2045 RTP/SCS. The Project would provide greater proximity to jobs, services, and other commercial and entertainment uses, and would be well served by existing public transportation, including Metro bus lines and rail lines. This is evidenced by the Project Site's location within a designated HQTA. The Project would generate 1,366 daily vehicle trips and 7,602 daily VMT, transportation outcomes that result in per capita travel levels less than 15 percent of the threshold for the Central Area Planning Commission area. Specifically, the Project would result in a household VMT per capita of 5.6. This would meet and exceed the 2016-2040 RTP/SCS' objective of a 7.4 percent reduction in VMT per capita from 20.5 miles per person by 2040. Finally, the introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2020-2045 RTP/SCS related to locating new housing and jobs near transit.

The 2020-2045 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020 and a 19 percent decrease in VMT by 2035. By meeting and exceeding the SB 375 targets for 2020 and 2035, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2020-2045 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel.

As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be

consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation, and no further analysis of this topic in the EIR is required.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The energy conservation plans and policies relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency. In addition, the Project would implement sustainability measures (described previously) to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2020-2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to a major job center (Downtown Los Angeles) and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFÉ fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant, and no further analysis of this topic in the EIR is required.

VII. GEOLOGY AND SOILS

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

The analysis in this section is based on the following:

Appendix D-1 Geotechnical Investigation Report, GeoPentech, May 26, 2020.

Appendix D-2 Paleontological Resources Records Search, Natural History Museum of Los Angeles County, July 5, 2018.

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? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigation prepared for the Project (included in Appendix D-1 of this Initial Study), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.[38] The Project Site is located on the hanging wall of the Puente Hills Blind Thrust Fault. However, blind thrusts do not represent discrete surface rupture hazards to the Project Site. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on

[38] Geotechnical Investigation Report, GeoPentech, May 2020, pages 4-6. See also City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, accessed November 19, 2020.

the Alquist-Priolo Special Studies Zone Map issued by the State Geologist in 2014 for the area or based on other substantial evidence of a known fault on the Project Site.

Additionally, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to compliance with existing state and local regulations, including the California Building Code (CBC) and the Los Angeles Building Code (LABC) and with the recommendations contained in the final geotechnical report prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety (LADBS). The CBC and LABC, with which the Project would be required to comply, contain construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not cause potential substantial adverse effects as a result of a known earthquake fault in or around the Project Site. Therefore, Project impacts with respect to fault rupture would be less than significant, and no further analysis of this issue in the EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in a seismically active Southern California region. Known regional active faults that could produce significant ground shaking at the Project Site include the Hollywood Fault, the Newport-Inglewood Fault, the Raymond Fault, and the Santa Monica Fault. Potentially active blind thrust faults in the region are believed to include the Puente Hills Blind Thrust and the Upper Elysian Park Blind Thrust. However, the Project does not include the types of activities, such as mining operations, boring of large areas, the extraction or injection of oil or groundwater, horizontal drilling, or other industrial activities that would cause or exacerbate substantial adverse effects involving strong seismic ground shaking.

Given the Project Site's location in a seismically active region, the Project Site could experience seismic ground shaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the CBC. The CBC would preclude the Project from employing techniques or methods which would directly or indirectly initiate or worsen seismic ground shaking as part of the normal construction and operations. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, 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 current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure directly or indirectly to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury.

In addition, a geotechnical report was prepared for the Project Site (included in Appendix D-1 of this Initial Study), which included an analysis of the Project with respect to seismic conditions, and developed recommendations for design and construction of the proposed tower and associated podium structure. A final design level geotechnical report would be required and reviewed to the satisfaction of the Department of Building and Safety prior to the issuance of grading permits, and the final recommendations from that report will be enforced during construction of the Project. Based on the geotechnical report contained in Appendix D-1 of this Initial Study, the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site.

Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing building codes, Project impacts associated with seismic ground shaking would be less than significant, and no further analysis of this issue in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

As discussed in the Geotechnical Investigation Report prepared for the Project Site (included in Appendix D-1 of this Initial Study), the State of California Seismic Hazard Zone Map for the Hollywood Quadrangle indicates that the Project Site is not located in an area designated as having a potential for liquefaction. This is consistent with the site exploration conducted for the Geotechnical Investigation Report, which indicates that the soils beneath the Project Site are predominantly dense to very dense sands and very stiff to hard sandy to silty clays. In addition, free groundwater was not encountered in the borings at the Project Site to a depth of 150 feet below ground surface. Therefore, the potential for liquefaction at the Project Site is considered to be negligible.[39]

Construction of the Project would not involve the injection of water or any other liquid into the ground. In addition, construction of the Project would be subject to the LABC requirements and recommendations included in the final geotechnical report. As such, liquefaction potential for the Project Site is considered low. Based on the above, development of the Project would not directly or indirectly cause or exacerbate geologic hazards, including seismic-related liquefaction. Therefore, Project impacts related to liquefaction would be less than significant, and no further analysis of this issue in the EIR is required.

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[39] Ibid., 8.

iv. Landslides?

No Impact. The Project Site is relatively flat and is not identified by ZIMAS as being within a landslide hazard zone. Further, according to the Geotechnical Investigation Report, the Project Site is not in a designated earthquake-induced landslide hazard zone. Therefore, the potential for landslides is negligible. The Project would result in no impacts with respect to landslides, and no further analysis of this issue in the EIR is required.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. During the Project's construction phase, activities such as excavation below ground surface, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Site, as well as to prepare and 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 site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City (specifically LA Sanitation/Department of Public Works) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during the rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Further, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. As discussed previously, the liquefaction potential at the Project Site is considered to be negligible. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. As discussed in the Geotechnical Investigation Report, although the Project Site is located over the Los Angeles Downtown Oil Field, subsidence of the area above this oil field has not been reported. Additionally, the subsurface soils are not known to contain significant quantities of peat that would create a potential for subsidence. Therefore, the potential for subsidence is considered low.

The Project Applicant would be required by the LADBS, as part of the permitting process, to submit a final geotechnical report that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with CBC and LABC building standards that apply to buildings within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report, impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project. Project impacts would be less than significant, and no further analysis of this issue in the EIR is required.

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?

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Investigation Report prepared for the Project Site, expansive soils are not considered to be hazards located at the Project Site. Therefore, development of the Project would not cause or exacerbate geologic hazards, and no impact with respect to expansive soils would occur. No further analysis of this issue in the EIR is required.

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

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available

for the disposal of wastewater. Therefore, no impacts related to this issue would occur, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if grading or excavation activities associated with the Project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and is currently developed with an office building and surface parking lot. According to the Natural History Museum of Los Angeles County (see correspondence contained in Appendix D-2 of this Initial Study), there are no known vertebrate fossil localities that lie directly within the Project Site boundaries, although there are localities nearby from the same sedimentary deposits that occur in the Project area. Although no paleontological or unique geological resources are known to exist on-site, there is a possibility that paleontological resources exist at sub-surface levels on the Project Site and may be uncovered during excavation to maximum depth of 40 feet for the proposed subterranean parking levels.

However, the City has established a standard condition of approval to address the inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter so that the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the find. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey or report shall be submitted to the Los Angeles County Museum of Natural History and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with this condition of approval, all activities would be conducted in accordance with regulatory requirements.

With implementation of the City's established condition of approval to address any inadvertent discovery of paleontological resources, Project impacts would be less than significant, and no mitigation measures would be required. Therefore, no further analysis of this topic in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis in this section is based on the following:

Appendix A Air Quality and Greenhouse Gas Emissions Analysis, DKA Planning, November 2020.

Existing Conditions

The Project Site is occupied by 8,000 square feet of general office floor area with a surface-level parking lot. As summarized in Table VIII-1, most emissions would be associated with mobile sources from the 57 daily vehicle trips traveling to and from the Project Site on an average weekday. [40]

Table VIII-1
Annual GHG Emissions Summary (Existing)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	<1
Energy[c] (electricity and natural gas)	62
Mobile	65
Solid Waste[d]	4
Water/Wastewater[e]	18
Total Emissions	**148**

[a] CO_2e was calculated using CalEEMod model, version 2016.3.2.
[b] Area source emissions are from landscape equipment and other operational equipment.
[c] Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
[d] Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
[e] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
Source: DKA Planning, 2020. Modeling results included in Appendix A of this Initial Study.

[40] Raju Associates, Inc. Transportation Assessment Study for the 1201-1215 S. Grand Avenue and 410 West 12th Street Mixed-Use Project, May 2020.

Methodology

Because there is no adopted numeric threshold of significance for GHG emissions, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.[41] This evaluation is the sole basis for determining the significance of a project's GHG-related impacts on the environment.

However, for informational purposes, the consistency analysis also discloses the amount of GHG emissions emitted through the use of recommended air quality models. This disclosure ensures the estimate of a project's GHG emissions satisfies State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[42] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute. through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[43] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from a project. The information provided in this section is consistent with the General Reporting Protocol's reporting requirements.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, onsite combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, offsite emissions associated with purchased electricity or purchased steam.

41 CEQA Guidelines, Section 14 CCR 15064.4.

42 California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009.

43 Ibid.

- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[44]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

The California Air Resources Board (CARB) recommends consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[45] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[46] Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is an inability to conclude whether a project's GHG emissions represent a net global increase, reduction, or no change in GHG emissions that would exist if the project were not implemented. The analysis of the Project's GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

The California Emissions Estimator Model® (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and

[44] Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

[45] CARB, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.

[46] OPR Technical Advisory, p. 5.

comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[47]

Construction

The Project's construction emissions were calculated using CalEEMod Version 2016.3.2. Details of the modeling assumptions and emission factors are provided in Appendix A of this Initial Study. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile-source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove the existing building and pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[48] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operation

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors from LADWP, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas

[47] California Air Pollution Control Officers Association, California Emissions Estimator Model, CalEEMod™, www.caleemod.com, accessed May 25, 2016.

[48] SCAQMD Governing Board Agenda Item 31, December 5, 2008.

combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using the City of Los Angeles' VMT Calculator as provided in the Transportation Study prepared for the Project. The VMT values account for the daily and seasonal variations in trip frequency and length associated with new residential, employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2014 model and also takes into account actions and mandates expected to be in force in 2025 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips as a result of project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2025 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2014 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

There are no GHG emissions thresholds adopted by the SCAQMD that are applicable to the Project. In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance

thresholds.[49] Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, such commercial and residential projects would have been assumed to have a less than significant impact on climate change. However, this proposed screening threshold was not adopted by the SCAQMD.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of the *Climate Change Scoping Plan*, the 2020–2045 RTP/SCS, and the Sustainable City pLAn/LA Green New Deal.

As part of the *Climate Change Scoping Plan*, a statewide emissions inventory was developed as required by AB 32 which directs CARB to develop and track GHG emissions reductions to document progress towards the state GHG target. The emissions inventory also takes into account GHG emissions reduction measures developed by CARB to achieve state targets. Consistency with the *Climate Change Scoping Plan* is evaluated by comparing the Project's GHG reduction measures to those contained in the Scoping Plan.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this section estimates reductions of Project-related GHG emissions resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future.

While there are many ways to quantify the efficiency of the GHG reduction measures provided for in the plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken [NAT] Scenario. This approach is consistent with the concepts used in CARB's 2017 Climate Change Scoping Plan. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the Climate Change Scoping Plan that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out. The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed

mitigation measures. As an example, a NAT scenario would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation.

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?

The analysis provided below addresses both subsection (a) and subsection (b). The discussion of plan consistency (subsection (b)) is provided first, followed by a discussion of the Project's GHG emissions (subsection (a)).

Less Than Significant Impact. The discussion below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan*, the 2020–2045 RTP/SCS, and the Sustainable City pLAn/LA Green New Deal. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies and would produce GHG emissions that would not have a significant impact on the environment.

Plan Consistency

Statewide

Climate Change Scoping Plan

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32 that has been updated over time to reflect updated strategies.[50] In addition, SB 32 was approved in 2016, calling for deeper GHG emissions reductions by 2030. The *2017 Climate Change Scoping Plan* addresses the 2030 horizon and has a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Table VIII-2, below, provides a brief discussion of the mandatory compliance measures contained in the Climate Change Scoping Plan that would indirectly apply to the Project but that would nevertheless reduce the Project's GHG emissions. Provided in Table VIII-3 is an evaluation of the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2017 Climate Change Scoping Plan Update*.[51] As discussed therein, the Project

[50] Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

[51] An evaluation of stationary sources is not necessary as the stationary sources emissions will be created by emergency generators that would only be used in an emergency.

would be consistent with the GHG reduction-related actions and strategies of the 2017 *Climate Change Scoping Plan Update*.

The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the *2017 Climate Change Scoping Plan Update*. As discussed therein, the Project would be consistent with the GHG reduction-related actions and strategies of the *2017 Climate Change Scoping Plan Update.*

Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the analysis in Table VIII-3, the Project would be consistent with the State's Climate Change Scoping Plan and, thus, impacts related to consistency with the Scoping Plan would be less than significant.

Table VIII-2
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Mandatory Regulatory Compliance Measures
Energy (25 Percent of Project Inventory)
RPS Program and SB 2X. The California RPS program required public and investor-owned utilities in California to receive at least 33 percent of electricity from renewable sources by 2020. SB 350 requires 50 percent renewables by 2030. In 2019, LADWP indicated that 32 percent of its electricity came from renewable resources in 2018. Electricity GHG emissions in this analysis assume that LADWP will receive at least 50 percent of electricity from renewable sources by 2030 consistent with SB 350. The CalEEMod default carbon intensity for electricity from LADWP is based on a 2007 renewables portfolio of 8 percent. Under SB 100, LADWP is required to generate electricity that increases renewable energy resources to 50 percent by 2026 and 60 percent by 2030. The Project would comply with these requirements based on its service from LADWP and was analyzed within CalEEMod to reflect 2025 renewables portfolio assuming a straight-line interpolation to SB 100 requirements. **SB 350.** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances. The Project would support this regulation since the Project would comply with Title 24 standards.
Cap and Trade Program. As required by AB 32 and the Climate Change Scoping Plan, this program covers GHG emissions associated with electricity consumption in California. This program applies to electric service providers and not to land use developments. The Project would benefit from this program as GHG emissions would be indirectly covered by the Cap and Trade program. Further, the program covers GHG emissions associated with combustion of transportation fuels in California. While not quantified in this analysis, the Project would benefit from this program in that GHG emissions from the Project's electricity use would indirectly be covered by the Cap and Trade Program.
Mobile (66 Percent of Project Inventory)
Advanced Clean Cars Program: CARB approved the Advanced Clean Cars Program in 2012, which establishes an emissions control program for model year 2017 through 2025 and calls for increasing the number of zero emission vehicles manufactured in the 2018 through 2025 model years. These standards apply to all passenger and light duty trucks within California. Mobile source GHG emissions in this analysis conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation. The Project would further support this regulation since the Project will provide at least 30 percent of the total parking spaces provided to be capable of supporting future Electric Vehicle Supply Equipment (EVSE) per City codes. The Scoping Plan recommends additional mobile source strategies through the extension of the Advanced Clean Cars Program which would increase GHG stringency on light duty autos and continue adding zero emission and plug-in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also indirectly benefit from these measures once adopted.

Table VIII-2
Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

Low Carbon Fuel Standard (LCFS): The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. This additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.
Solid Waste (1 Percent of Project Inventory)
California Integrated Waste Management Act of 1989: The regulation required each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000. **AB 341 (2011)** amended the regulation to call for at least 75 percent of solid waste generated to be reduced, recycled, or composted by 2020, and annually thereafter. The Project complies with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent. Project-related GHG emissions from solid waste generation provided in this analysis includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Project would also use waste disposal services that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins to promote recycling of paper, metal, glass and other recyclable material. Further, the Project would recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials will be sorted on-site or comingled.

Table VIII-3
Consistency Analysis—2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
CCR, Title 20: The Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	**No Conflict.** These standards are included in default parameters provided in CalEEMod and are reflected in Project-related GHG emissions provided in this analysis.
CCR, Title 24, Building Standards Code: The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State and CEC	**No Conflict.** The Project must comply with applicable provisions of the 2020 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the CalGreen Building Standards. The 2019 Title 24 standards represent "challenging but achievable design and construction practices" and are substantially more efficient than the 2020 Projected Emissions under Business-as-Usual in the *Climate Action Scoping Plan*. Thus, in complying with the Los Angeles Green Code, the Project has incorporated energy efficiency standards that do not conflict with measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
AB 1109: The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.	State/ Manufacturers	**No Conflict.** The Project would not conflict with requirements under AB 1109 because it complies with local and state green building programs and incorporates energy efficient lighting and electricity consumption in compliance with 2019 Title 24 Standards. This reduction was reflected in CalEEMod default assumptions and was therefore included in the calculation of Project GHG emissions.

Table VIII-3
Consistency Analysis—2017 Scoping Plan Update

SB 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a SCS to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB, Regional, SCAG	**No Conflict.** SB 375 requires SCAG to direct the development of the SCS for the region. The Project represents an infill development within an existing urbanized area that would concentrate new residential and retail/restaurant uses within an HQTA. As required by SB 375, CARB is required to update regional GHG emissions targets every 8 years. CARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035. The Project-related residential VMT per capita would be approximately 67 percent below the 2016–2040 RTP/SCS baseline per capita VMT and would be greater than the reduction targets in the 2016–2040 RTP/SCS and CARB's updated 2035 target of 19 percent. Project-related worker VMT per capita would be 67 percent below the 2016–2040 RTP/SCS baseline per capita VMT. Therefore, the Project would be consistent with SB 375, the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS, and with CARB's updated 2035 target.
Updated Scoping Plan: By 2019, adjust performance measures used to select and design transportation facilities. • Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**No Conflict.** The Project would not involve construction of transportation facilities. However, the Project is located three blocks east of the Metro Rail Line Pico station. The Project would benefit from the availability of rail transit and local and commuter transit bus services that would reduce Project-related vehicle trips to and from the Project Site.
Updated Scoping Plan: By 2019, develop pricing policies to support low-GHG transportation (e.g. low- emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**No Conflict.** The Project would not conflict with this policy which would not be implemented at the Project level. The Project would support this policy by providing electric vehicle supply wiring (EV ready) in at least 30 percent of the total code required parking spaces and electric vehicle charging stations at 10 percent of the total code required parking spaces consistent with City codes.

Table VIII-3
Consistency Analysis—2017 Scoping Plan Update

CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) call for new residential and non-residential uses, to reduced overall water use by 20 percent.	State	**No Conflict.** The Project would comply with applicable provisions of the 2020 Los Angeles Green Building Code which in turn requires compliance with mandatory standards included in the CalGreen Building Standards (20-percent overall water use reduction). Water use were calculated consistent with the requirements under City of Los Angeles Ordinance No. 184,248, 2016 California Plumbing Code, 2019 CalGreen Code, 2017 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code and reflects approximately a 20-percent reduction in water usage as compared to the base demand provided in CalEEMod. The Project's reduction in water usage would also reduce energy and associated emissions required to pump and treat water.
SB X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	State	**No Conflict.** As discussed above under Title 24, the Project would incorporate water conservation features that would contribute towards meeting this performance-based standard. The Project thereby includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.
CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	**No Conflict.** The Project would use construction contractors that comply with this regulation.

Table VIII-3
Consistency Analysis—2017 Scoping Plan Update

CARB In-Use On-Road Regulation: CARB's in-use on-CARB road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses.	CARB	**No Conflict.** The Project would use construction contractors that would comply with this regulation. This regulation requires replacement of older trucks with more efficient trucks. Trucks used during construction would comply with this measure requiring more efficient engines which will reduce emissions.
Implement the Short-Lived Climate Pollutant Strategy by 2030: - 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels - 50-percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No Conflict.** SB 605 was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. SB 1383 was later adopted in 2016 to require CARB to set emissions below 2013 levels. The Project would comply with the SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**No Conflict.** Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50-percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. As of March 2018, CalRecycle is currently holding workshops to review draft regulatory language. Regulations to achieve SB 1383 targets are expected to take effect in 2022. The Project would not conflict with AB 341 which requires not less than 75 percent of solid waste generated be source reduced through recycling, composting or diversion. Reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383. This reduction in solid waste generation was not reflected in CalEEMod default assumptions and was conservatively not included in the calculation of Project GHG emissions.

Table VIII-3
Consistency Analysis—2017 Scoping Plan Update

[a] Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.
[b] CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.
[c] CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm.
[d] CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.
[e] CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.
[f] CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.
Source: California Air Resources Board (CARB), California's 2017 Climate Change Scoping Plan, November 2017.

Regional

2020–2045 RTP/SCS

The 2020-2045 RTP/SCS (or Connect SoCal plan) outlines more than $638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increased growth in walkable, mixed-use communities, and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region. Table VIII-4 provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS.

Table VIII-4
Consistency with the 2020 RTP/SCS

Objectives[a]	Consistency Analysis
Increase percentage of region's total household growth occurring within HQTAs.	**No Conflict.** The Project would increase the City's housing stock by providing 312 residential units within a HQTA.
Increase percent of the region's total employment growth occurring within HQTAs.	**No Conflict.** The Project is an infill development that would create approximately 28 jobs, consistent with the 2020 RTP/SCS policies to focus growth within HQTAs.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**No Conflict.** The Project is an infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	**No Conflict.** The Project would construct housing and neighborhood-serving retail/restaurant uses near other residential, commercial, office, and entertainment uses. Therefore, Project residents and employees would be able to walk and bike to work and to shopping. In addition, the Project Site's location near robust transit opportunities (bus and rail) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions. As shown in Table VIII-8, the Project's VMT per capita of 5.6 would be well below SCAG's daily VMT goal per capita of 22.2 in 2016 and 19.2 in 2045 (for Los Angeles County). As such, the Project would represent an approximately 71 percent reduction in VMT per capita from the regional SCS and would help advance the climate change objectives of both SCAG and the State of California.

Table VIII-4
Consistency with the 2020 RTP/SCS

Objectives[a]	Consistency Analysis
Decrease average daily distance traveled for work and non-work trips (in miles)	**No Conflict.** The Project is an infill development that would provide jobs and housing to the downtown area near heavy transit infrastructure (both rail and bus) that would reduce travel distances per capita. The density of uses in Downtown Los Angeles (including a mix of housing, jobs, entertainment, and institutional uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location Downtown, and would also further contribute to decreases in the distance of average daily trips.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**No Conflict.** The Project is an infill development that would provide jobs and housing to the Downtown area near heavy transit infrastructure (both rail and bus) that would increase the percentage of work and non-work travel less than three miles in length. The density of uses in Downtown Los Angeles (including a mix of housing, jobs, entertainment, and institutional uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location Downtown, and would also further contribute to increasing the percentage of trips that are less than 3 miles in length.
Increase share of short trip lengths for commute purposes.	**No Conflict.** The Project is an infill development that would provide jobs and housing to the Downtown area near heavy transit infrastructure (both rail and bus) that would increase the share of short trip lengths for commute trips. The density of uses in Downtown Los Angeles (including a mix of housing, jobs, entertainment, and institutional uses) results in shorter work and non-work trips by vehicles and other forms of transportation. The Project would benefit from this based on its location Downtown, and would also further contribute to shorter trips for commute purposes.
Increase percentage of trips that use transit (work and all trips)	**No Conflict.** The Project is an infill development that would provide housing and jobs to the Downtown area near heavy transit (both rail and bus lines) infrastructure that would help increase transit mode share.
Decrease average travel time to work (all modes)	**No Conflict.** The Project is an infill development in Downtown Los Angeles that will reduce the rate of growth in auto traffic and congestion by its proximity to heavy transit (including rail and bus lines) and active transportation mode share given its location at the intersection of 12th Street and Grand Avenue. Because the Project's location will attract travel to and from the Downtown area and local community, average travel time to work would be reduced.
Increase percentage of trips using either walking or biking (by trip type)	**No Conflict.** The Project is an infill development in Downtown Los Angeles that will reduce the rate of growth in auto traffic and congestion by its proximity to heavy transit (including rail and bus lines) and active transportation mode share given its location at

Table VIII-4
Consistency with the 2020 RTP/SCS

Objectives[a]	Consistency Analysis
	the intersection of 12th Street and Grand Avenue. Grand Avenue is designated as a Pedestrian Segment within the Pedestrian Enhanced District, which will attract future infrastructure investment to incentivize walking. In addition, Grand Avenue is identified as a Tier 1 Protected Bicycle Lane facility within the Bicycle Enhanced Network, which would encourage trips via biking.
Reduce per capita GHG emissions (from 2005 levels)	**No Conflict.** The Project is an infill development in Downtown Los Angeles that will reduce the rate of growth in auto traffic and congestion by its proximity to heavy transit (including rail and bus lines) and active transportation mode share given its location. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	**No Conflict.** The Project is an infill development in Downtown Los Angeles that will reduce the rate of growth in SOV use and congestion by its proximity to heavy transit (including rail and bus lines) and active transportation mode share given its location at the intersection of 12th Street and Grand Avenue. Grand Avenue is designated as a Pedestrian Segment within the Pedestrian Enhanced District, which will attract future infrastructure investment to incentivize walking. In addition, Grand Avenue is identified as a Tier 1 Protected Bicycle Lane facility within the Bicycle Enhanced Network, which would encourage trips via biking.
[a] Objectives from Table 5.1, Connect SoCal Performance Measures & Results, of SCAG's 2020-2045 RTP/SCS.	

Local

Locally, the City has a number of conservation-based plans, programs, and requirements that also indirectly produce GHG reductions. While these are not considered climate action plans, the Project's consistency with these local initiatives is summarized below.

City of Los Angeles General Plan Air Quality Element

The Project would be consistent with the City's General Plan, specifically its 1989 Air Quality Element. While this Element did not explicitly address control of greenhouse gases, global climate change, or resiliency objectives, it did identify several goals focused on criteria pollutant emissions that would be effective in reducing carbon-based emissions that contribute to climate change. Table VIII-5 summarizes the Project's general consistency with this policy document.

Table VIII-5
Consistency with the City of Los Angeles Air Quality Element

Goal	Consistency Analysis
1. Good air quality and mobility in an environment of continued population growth and healthy economy.	**No Conflict.** The Project is a mixed-use, infill development in the dense Central City neighborhood that accommodates population growth while minimizing congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs of the surrounding area.
2. Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**No Conflict.** The Project is a mixed-use, infill development in the dense Central City neighborhood that will reduce reliance on auto transportation because of its proximity to public transit, Complete Communities, and general density of population and jobs of the surrounding area.
3. 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.	**No Conflict.** The Project is a mixed-use, infill development in the dense Central City neighborhood that would be consistent with the Element's focus on growing near transit facilities. It is also served by Metro's local and Rapid bus services, and would be in close proximity to Metro's Pico Rail station which provides access to its A and E lines.
4. 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 free parking.	**No Conflict.** The Project is a mixed-use, infill development in the dense Central City neighborhood that would be consistent with the Element's focus on energy efficiency through land use and transportation planning. It is also served by Metro's local and Rapid bus services, and would be in close proximity to Metro's Pico Rail station which provides access to its A and E lines.
Source: DKA Planning, 2020.	

City of Los Angeles Green New Deal/Sustainable City pLAn

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[52] Specific targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero emission vehicles by 2050. The Sustainable City pLAn is to be updated every four years.

The Green New Deal, a 2019 mayoral initiative that updates the Sustainable City pLAn, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including:

52 City of Los Angeles, Sustainable City pLAn, 2019.

water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[53] Specific targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero emission vehicles by 2050.

Although the Sustainable City pLAn/L.A.'s Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development consisting of residential and retail/restaurant uses on the Project Site, which is located near regional and local transit services. The Project's location near bus and rail lines would encourage transit use. Furthermore, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal/Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents, employees, and visitors. Therefore, the Project would be consistent with the Green New Deal/Sustainable City pLAn, and impacts would be less than significant.

Project GHG Emissions

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

53 City of Los Angeles, Green New Deal, 2019.

The Project would generate an incremental contribution to a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

Project construction is anticipated to be completed in 2025 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix A of this Initial Study. The GHG emissions associated with construction of the Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table VIII-6.

As presented in Table VIII-6, construction of the Project is estimated to generate a total of 5,298 $MTCO_2e$. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[54] This results in annual Project construction emissions of 177 $MTCO_2e$. A complete listing of Project construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix A to this Initial Study.

Table VIII-6
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2022	1,472
2023	1,411
2024	1,403
2025	1,011
Total	**5,298**
Amortized Over 30 Years	**177**

a CO_2e was calculated using CalEEMod, and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix A of this Initial Study.
Source: DKA Planning, 2020.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. As shown in Table VIII-7, the Project would result in a total of approximately 5 $MTCO_2e$ per year from area sources.

[54] SCAQMD Governing Board Agenda Item 31, December 5, 2008.

Table VIII-7
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [MTCO2e])

Year	$MTCO_2$[a]
Area[b]	5
Energy[c] (electricity and natural gas)	934
Mobile	896
Solid Waste[d]	28
Water/Wastewater[e]	274
Construction	177
Total Emissions	**2,314**

[a] CO_2e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix A of this Initial Study.
[b] Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.
[c] Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.
[d] Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.
[e] Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.
Source: DKA Planning, 2020.

Electricity and Natural Gas Generation Emissions

GHG emissions 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 GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions 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 emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project 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 emissions intensity factors for LADWP were selected in CalEEMod. The carbon intensity (pounds per megawatt an hour (lbs/MWh)) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year of 2025. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

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 in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., 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.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.[55] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool of CEUS/RASS.

As shown in Table VIII-7, estimated Project GHG emissions from electricity and natural gas usage would result in a total of 1,567 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT. The traffic activity data used to calculate mobile source emissions was generated by the LADOT VMT Calculator. This tool incorporates the USEPA's MXD model to calculate trip reductions for multi-use developments. This model ensures that factors like resident and job density, availability of transit, accessibility of bicycling and walking paths are considered when estimating the actual trip generation profile of mixed-use projects in urban environments.

As shown in Table VIII-8, the Project's VMT per capita of 5.6 would be well below SCAG's daily VMT goal per capita of 22.2 in 2016 and 19.2 in 2045 (for Los Angeles County). As such, the Project would represent an approximately 71 percent reduction in VMT per capita from the regional SCS and would help advance the climate change objectives of both SCAG and the State of California.

Table VIII-8
Comparison of Project Total VMT/Capita to 2020-2045 RTP/SCS

Factor	Estimate
Total VMT (Project)[a]	7,602 Daily VMT
VMT per Capita[b]	5.6
SCAG 2020-2045 RTP/SCS VMT Target per Capita (Los Angeles County)	22.2 (2016) 19.2 (2045)

[a] VMT was calculated using the LADOT VMT Calculator. See the Transportation Assessment contained in Appendix H-1 of this Initial Study. See also Table XVII-1 in the Transportation section of this IS.
[b.] See Table XVII-1 in the Transportation section of this IS.
Source: DKA Planning, 2020.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which produces an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod

[55] CEC, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-7, the Project is estimated to result in a total of 28 $MTCO_2e$ per year from solid waste that accounts for a 76-percent recycling/diversion rate, pursuant to AB 341 requirements.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which produces an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.[56] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2016 California Plumbing Code, 2019 CALGreen, and 2017 Los Angeles Plumbing Code, and reflect an approximately 20-percent reduction as compared to the base demand.

As shown in Table VIII-7, estimated Project GHG emissions from water/wastewater usage would result in a total of 274 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Combined Construction and Operational Emissions

As shown in Table VIII-7, when taking into consideration implementation of requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal an estimated 177 $MTCO_2e$ annually (as amortized over 30 years) during construction. When combined with operational emissions from area, energy, mobile, waste, and water sources, the Project would generate 2,314 $MTCO_2e$ annually.

Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans

As noted earlier, one approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a NAT comparison. The

[56] The intensity factor reflects the average pounds of CO_2e per megawatt generated by a utility company.

analysis in this section includes potential emissions under a NAT scenario and from the Project at build-out based on actions and mandates in force in 2020.

As shown in Table VIII-9, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 2,314 and 3,399 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by approximately 32 percent from CARB's 2020 NAT scenario.

Table VIII-9
Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans

Scenario and Source	NAT Scenario*	Project As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	5	5	-	0%
Energy Sources	1,551	934	-617	-40%
Mobile Sources	1,277	896	-381	-30%
Waste Sources	115	28	-87	76%
Water Sources	274	274	-	0%
Construction	177	177	-	0%
Total Emissions	3,399	2,314	-1,085	-32%

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.
* NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume reduction in energy emissions from SB 100 renewable energy sourcing, or AB 341 waste diversion requirements
Source: DKA Planning, 2020.

This analysis uses the 2017 Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution to climate change. The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's mixed-use nature and location in an existing dense urban setting in the Central City Community Plan Area provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, it would eliminate many vehicle trips, because travel to and from the Project Site could be captured by public transit and pedestrian

travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

Post-2030 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[57] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target.

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors. By meeting and exceeding the SB 375 targets, the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS are expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals.

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the Project would be consistent with the Actions

[57] Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

and Strategies set forth in the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2020–2045 RTP/SCS, and the Green New Deal/Sustainable City pLAn. Consistency with the above plans, policies, regulations, and GHG emissions reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant, and no further analysis of this topic in the EIR is required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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?	☐	☐	☐	☒

The analysis in this section is based on the following:

Appendix E-1 Phase I Environmental Site Assessment, Property Condition Assessments, LLC, December 4, 2014.

Appendix E-2 Phase I Environmental Site Assessment, Letter Update, Property Condition Assessments, LLC, January 6, 2021.

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

Less Than Significant Impact. A significant impact may occur if a project involves the use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment. Construction of the Project would not use a significant amount of hazardous materials, and the types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use building (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). While construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities. As the Project would not

use a significant amount of hazardous materials during construction, it would not create a significant hazard to the public or the environment, and this impact would be less than significant.

The Project includes removal of the existing office building and surface parking lot from the Project Site and construction of a mixed-use building containing up to 312 residential units and approximately 7,100 square feet of retail/restaurant uses. The types of hazardous materials that would be found on the Project Site during the operation of the Project would be typically associated with residential and commercial land uses – paints, cleaning supplies, and small amounts of petroleum products. The Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal of small amounts of hazardous materials, compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project's impacts related to this issue would be less than significant, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to the public or the environment by releasing hazardous materials into the environment through accident or upset conditions. The following provides a summary of observations from the Phase I Environmental Site Assessment (Phase I ESA) prepared by Property Conditions Assessments (PCA), LLC (included in Appendix E-1 of this Initial Study). In addition, a letter update to the Phase I ESA has been prepared and is included in Appendix E-2 of this Initial Study. The update letter confirmed that the conclusions from the Phase I ESA are still valid, and no further investigation is recommended in the update letter.

Polychlorinated Biphenyls (PCBs)

PCBs were used as coolants and insulators in electrical transformers beginning in 1929. Exposure to PCBs has since been found to cause liver ailments, skin lesions, tumors, and growth and reproductive problems. Use of PCBs was regulated in 1977. No records or evidence were identified indicating the presence of PCBs on the Project Site. Therefore, PCBs are not an issue of concern.

Asbestos-Containing Materials (ACMs)

While the use of asbestos in the manufacture of most building materials has not been fully prohibited by federal law, the use of asbestos, for the most part, has voluntarily been discontinued since the late 1970s. Some non-friable materials, such as roofing material and floor coverings (floor tile and mastic) may have been manufactured with asbestos materials and may have been used into the early 1980s. Based on the date of construction of the building improvements at the Project Site (1931), it is possible that ACMs were used during the construction and/or maintenance of the building improvements at the Project Site. On November 18, 2014, PCA

performed a limited screening for asbestos by retrieving four samples of suspect building materials from the Project Site. The results of the laboratory testing show that friable (easily crumbled) ACMs were discovered in the spray-on insulation material on the open beams in the lobby of the second floor, and exposed pipe wrap on the first floor mezzanine. These materials were observed to be in good condition.

Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with existing City, state, and federal rules and regulations, including the federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 Code of Federal Regulations 61 Subpart M), the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926.1101) California Occupational Safety and Health Administration (CAL-OSHA) regulations (California Code of Regulations, title 8, Sections 341.15, 1529), and SCAQMD Rule 1403, all materials, which are identified as ACM, would be removed by a trained and licensed asbestos abatement contractor. Generally, asbestos removal is a low risk operation. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The removal, transport, and disposal of ACMs from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and impacts would be less than significant.

Lead-Based Paint (LBP)

Lead was a major ingredient in paint pigment prior to and through the 1940s. While other pigments were used in the 1950s, the use of lead in paint continued until the mid-1970s. In 1978, the Consumer Products Safety Commission banned paint and other surface-coating materials, which are lead-containing paint. Based on the date of construction of the building improvements at the Project Site (1931), it is possible that lead-based paints were used during the construction and/or maintenance of the building improvements at the Project Site. Demolition of the existing building could therefore release LBP present in the structure. In order to ensure minimal exposure to sensitive receptors and workers, LBP found in the building shall be removed and disposed of as recommended by a qualified Department of Health Services lead consultant and in accordance with applicable federal, state, and City regulations, including the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926 et seq.), CAL-OSHA regulations (California Code of Regulations, title 8, Sections 1532.1 and 35001 *et seq.*). The removal and disposal of LBP from the Project Site in accordance with existing regulations would ensure that the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and impacts would be less than significant.

Oil and Gas Wells and Pipelines

Oil and gas wells can act as potential conduits for the migration of contamination, unless they have been properly abandoned (i.e., filled and plugged) in such as manner as to prevent the conducting of hazardous material into the groundwater aquifers. Oil or gas wells or pipelines were not identified on the Project Site during the site reconnaissance conducted during the Phase I evaluation, and were not depicted on the Munger Maps nor listed on file with the California

Geologic Energy Management Division. The nearest oil well is located east of the Project Site, between Grand Avenue and Olive Street.[58]

In addition, no Underground Storage Tanks (USTs) were identified on the Project Site by the Phase I evaluation.

Vapor Encroachment Screening

As part of the Phase I ESA, a vapor encroachment screening was conducted to determine whether a vapor encroachment condition from chemicals of concern that may migrate as vapors onto a property as a result of contaminated soil or groundwater on or near the Project Site is present. According to the Phase I ESA, no sites were identified in the radius map report and historical research that were considered to pose a vapor encroachment concern at the Project Site. Therefore, the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and no impact would occur.

Conclusion

The Phase I ESA concluded that no recognized environmental conditions (RECs) are present for the Project Site and surrounding off-site properties, and the Phase I ESA Update Letter confirmed that no RECs are present. Therefore, the Project would not create a significant hazard to the public or the environment through accident or upset conditions, and impacts would be less than significant. No further analysis of this topic in the EIR is required.

c. 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. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The following schools are located in proximity to the Project Site:

- Kid City Hope Place (After School Program), 1021 S. Hope Street, approximately 0.22 miles northwest of the Project Site;
- Los Angeles Universal Pre-School, 888 S. Figueroa Street #800, approximately 0.47 miles northwest of the Project Site; and
- 9th Street Elementary, 835 Stanford Avenue, approximately 0.95 miles east of the Project Site.

The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use building (e.g., paints, solvents, fuel for construction equipment, building materials, etc.), which could emit hazardous emissions. However, the use of these materials would comply with all applicable federal, state, and local regulations. In addition, there are intervening structures and roadways between the schools and the Project Site, and the distance between the Project Site and the

58 City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, accessed March 1, 2021.

nearest schools would ensure that the Project's use of these materials would not pose a hazard to these schools.

While the Project would be operational during school hours, operation of the Project would involve, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. In addition, there are intervening structures and roadways between the schools and the Project Site. Therefore, the Project would not pose a significant risk involving the routine transport, use, and disposal of hazardous materials or the accidental release of hazardous materials, and impacts associated with the emission of hazardous materials near an existing or proposed school would be less than significant, and no further analysis of this issue in the EIR is required.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks (USTs), 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, commonly referred to as the "Cortese List." A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. According to the Phase I ESA (included in Appendix E-1 of this Initial Study), the Project Site is not included on any list compiled pursuant to Section 65962.5 of the California Government Code. As part of the Phase I ESA Update Letter, a review of the *United States Environmental Protection Agency* ECHO, and *California Geotracker and Envirostor* databases was conducted. Based on the current database review, the Project Site is not included on these lists and the listed properties are not likely to negatively affect the Project Site based on listing type, distance, flow direction of ground water, depth to ground water, any remedial actions taken, and regulatory agency determination. Therefore, the Project would not create a hazard to the public or the environment, and impacts related to this issue would be less than significant. No further analysis of this topic in the EIR is required.

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?

No Impact. A significant impact may occur if a project is located within an airport land use plan, or within two miles of a public airport or public use airport, and would subject people residing or working in the area to a safety hazard or excessive noise levels. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Both the Santa Monica Airport and the Los Angeles International Airport (LAX) are located approximately 10.5 miles from the Project Site. Therefore, no impact would occur, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to develop an emergency response plan for the Project in consultation with the LAFD and the Los Angeles Department of Transportation (LADOT). The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by City regulations would ensure that Project impacts related to emergency response would be less than significant, and no further analysis of this topic in the EIR is required.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone.[59] Therefore, no impact regarding this topic would occur, and no further analysis of this topic in the EIR is required.

[59] City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, May 1, 2020.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 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. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies that regulate surface water quality and water

discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Project would be required to comply with the NPDES General Construction Permit, which satisfies the LARWQCB water quality standards, 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 the Project complies with the LARWQCB standards and therefore that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment projects in the City that require a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment protocols. Regulatory compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Regulatory compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Compliance with these regulations would ensure construction and operational activities of the Project would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality, and Project impacts related to water quality would be less than significant. No further analysis of this issue in the EIR is required.

b. 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 significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement, or includes withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. The Project Site is located in an urbanized area of the City and is developed with impervious surfaces (office building and surface parking lot). During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

Based on the Geotechnical Investigation Report conducted for the Project Site (refer to Appendix D-1 of this Initial Study), free groundwater was not encountered during drilling to depths of 150 feet below ground surface. Therefore, it is not likely that any temporary dewatering would be required during the construction of the proposed subterranean parking levels. Finally, all water consumption associated with the Project would be supplied by LADWP and not from any groundwater beneath the Project Site. Thus, impacts related to groundwater as a result of the Project would be less than significant, and no further analysis of this issue in the EIR is required.

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;

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation. The Project Site is located in a highly urbanized area of the City, with a general lack of permeable surfaces on the Project Site and in the surrounding area, as most sites are developed with urban uses or are paved and used as surface parking lots. There are no natural watercourses on the Project Site. As discussed above, the Project Site is currently developed with an existing office building and surface parking lot and is therefore completely impervious. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would be developed with additional permeable surfaces when compared to existing conditions, based on landscaping that would be provided as part of the Project. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), 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 not result in substantial erosion or siltation on- or off-site, impacts would be less than significant, and no further analysis of this topic in the EIR is required.

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. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and reduce off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site, as the Project Site is currently developed with an office building and surface parking lot and the Project would construct a similarly impervious surface at the Project Site (although the Project would contain slightly more permeable areas when compared to existing conditions due to the provision of landscaping, although the addition of landscaping would not increase the rate or amount of surface runoff). The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Regulatory compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Project impacts would therefore be less than significant, and no further analysis of this topic in the EIR is required.

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 may occur if a project would increase the volume of stormwater runoff to a level which exceeds the capacity of the storm drain system serving a project site, or if a project would substantially increase the probability that polluted runoff would reach storm drains. Runoff from the Project Site currently is and would continue to be collected on the Project Site and directed towards existing storm drains in the vicinity of the Project Site.

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment.

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. During construction, the Applicant will be required to demonstrate compliance with NPDES permitting, and will implement

all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-housekeeping" practices would ensure that short-term construction-related activities would not result in polluted stormwater leaving the site.

Pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Further, the project would be required to comply with 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. Thus, 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. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant, and no further analysis of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located near any bodies of water, rivers, or streams that are subject to flooding. Thus, the Project would not have the potential to impede or redirect flood flows and no impact related to this issue would occur. No further analysis of this topic in the EIR is required.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Site is not located within a 100-year flood zone, as mapped by the Federal Emergency Management Agency (FEMA, Flood Insurance Rate Map number 06037C1725F).[60] Further, the Project Site is located approximately 12 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur. No further analysis of this topic in the EIR is required.

[60] FEMA Flood Map Service Center, Search by Address, website: https://msc.fema.gov/portal/search?AddressQuery=1201%20grand%20avenue%20los%20angeles%20ca#searchresultsanchor, accessed January 14, 2021.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project is within the jurisdiction of the LARWQCB, and grading, excavation, and other construction activities associated with the implementation of the Project could impact water quality due to erosion resulting from exposed soils that may be transported from the Project Site in stormwater runoff. Compliance with the NPDES program would ensure that stormwater pollutants would not substantially degrade water quality. Further, the Project would be required to comply with the City's SUSMP requirements. Compliance with these regulations would ensure that Project impacts with respect to a water quality control plan or groundwater management plan would be less than significant. No further analysis of this topic in the EIR is required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐

The analysis in this section is based in part on the following:

Appendix F Land Use Consistency Tables, CAJA Environmental Services, LLC, May 2020.

a. Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community). The Project Site is located in a highly urbanized and heterogeneous area of the City. The Project would be constructed entirely within the bounds of the Project Site, a contiguous site comprised of two lots currently developed with a commercial building and surface parking, bounded entirely by existing public rights-of-way. Additionally, the Project Site is surrounded by

existing development. Regarding the surrounding land uses, the Project would provide a mix of residential and retail/restaurant uses. The Project's proposed residential and commercial uses would be consistent with other land uses in the surrounding area and compatible with the surrounding community. The Project would be an infill project providing uses in keeping with the development of recent mixed-use projects in the surrounding area. As such, the Project would complement and be compatible with existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Thus, Project impacts would be less than significant, and no further analysis of this issue in the EIR is required.

b. 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. The Project's consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect is discussed below. As provided in the below discussion, the Project would not conflict with any such plans, policies, or regulations, and impacts would be less than significant. Therefore, further analysis of this topic in the EIR is not required.

Regional

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

SCAG 2020-2045 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector.[61] It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS (also known as Connect SoCal).

[61] AB 32 was signed into law in 2006 and focuses on achieving GHG emissions equivalent to statewide levels in 1990 by 2020.

The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. The 2020-2045 RTP/SCS includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and HQTAs and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2020-2045 RTP/SCS is included in Appendix F of this Initial Study. As discussed therein, the Project represents an infill development within the dense Central City area that would concentrate more residential uses and retail/restaurant uses within an HQTA, which is defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is located approximately 0.15 miles from the Metro Rail Pico station served by the Metro A (Blue) and Metro E (Expo) lines with service to Long Beach and Santa Monica presently, and as part of the currently under construction Metro Regional Connector the same two lines will additionally serve Pasadena, Azusa, and East LA. The Project Site is also served by the Metro 7th and Figueroa Street Station, which is approximately 0.65 miles from the Project Site. The 7th Street and Figueroa Station is served by the Metro A Line (Blue), Metro E Line (Expo), Metro B Line (Red), and Metro D Line (Purple), as well as several local and commuter bus routes operated by Metro, OCTA, and municipal transit operators.

The Project would also provide bicycle storage areas for Project residents, employees, and guests. The Project would provide residents, employees, and guests with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. In addition, the Project would provide a 20-foot sidewalk along the Project's Grand Avenue frontage. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

The Project is the type of land use development that is encouraged by the 2020-2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in

turn, advances the state's long-term climate policies.[62] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 citywide elements.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address land use and serves as a guide for updating the community plans and the Citywide elements. The Framework Element provides a base relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, while the community plans determine the specific land use designations of individual parcels.

City of Los Angeles General Plan Air Quality Element

See Checklist Question III(a) (Air Quality) for a discussion of the Project's consistency with the Air Quality Element of the City of Los Angeles General Plan. As discussed therein, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation.

City of Los Angeles Mobility Plan 2035

See Checklist Question XVII(a) (Transportation) and the Transportation Assessment (contained in Appendix H-1 of this Initial Study) for a discussion of the Project's consistency with the Mobility Plan 2035. As discussed therein, the Project would be consistent with the policies of the Mobility Plan 2035.

City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting

[62] As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

its cultural and historical heritage. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.

As discussed above in response to Checklist Question V(a) (Cultural Resources), as part of SurveyLA findings, the existing building was assigned a California Register status code of 3CS, which means "appears eligible for the California Register through a survey evaluation." The building was additionally assigned a status code of 5S3, which means "appears to be individually eligible for local listing or designation through a survey evaluation." The Project involves the removal of this building. Therefore, Project impacts with respect to historic resources could be potentially significant and will be analyzed further in the EIR. This analysis will also consider whether the Project would conflict with the Conservation Element.

Central City Community Plan

The Project Site is located within the Central City Community Plan (CCCP) area, which is one of 35 community plans that comprise the Land Use Element of the City's General Plan. The City is currently in the process of updating the CCCP. Under the adopted Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of High Density Residential. The CCCP area is located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110) and west of Alameda Street. The CCCP area is surrounded by the City of Los Angeles community plan areas of Central City North to the north and the east; Southeast Los Angeles to the south; and both Westlake and South Los Angeles to the west.

Central City is the fourth smallest community plan area in the City of Los Angeles, representing less than one percent of the land in the City (approximately 2,161 acres or 3.38 square miles). Since this area is the governmental, financial, and the industrial hub of Los Angeles, land has primarily been dedicated to these uses. Consequently, this area has a smaller residential population in comparison with the rest of the City, although dwelling units and the residential population have been steadily increasing in the area.

The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work, and invest in the community. By serving to guide development, the CCCP encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. As stated in the CCCP, "South Park is recognized to be a mixed-use community with a significant concentration of housing. This thriving residential community includes the proximate siting of auxiliary support services such as retail and commercial developments that provide employment opportunities for area residents" and "[c]ommercial and mixed-use expansion between the Convention Center and Staples Center areas to the west, and

Transamerica Center to the east, is also expected to occur on the east-west streets including Olympic and Pico Boulevards, and north and south along the Grand Avenue-Olive Street-Hill Street corridors." In addition, Central City Community Plan Residential Objective 1-1 calls for the development of residential units in South Park, and Objective 1-2 states the desire to increase the range of housing choices available to downtown employees and residents. The Project would be consistent with these objectives as it would provide 312 residential units in South Park, that would be available to employees and residents in the area. The Project's residential units would include a mix of studio, 1-bedroom, 1-bedroom + den, 2-bedroom, and 3-bedroom units, which would provide a wide range of housing choices at the Project Site. Further, Central City Community Plan Commercial Policy 2-2.3 calls for supporting the growth of neighborhoods with small, local retail services, including in the South Park neighborhood. The Project would be consistent with this policy as it would add approximately 7,100 square feet of ground floor retail/restaurant uses to serve the South Park neighborhood.

Central City Community Plan Update (DTLA 2040 Plan)

The Los Angeles Department of City Planning is partnering with the Downtown community to update Downtown's Central City and Central City North Community Plans (DTLA 2040), as part of the department's New Community Plan Program. The update will build on Downtown's transit rich nature and will apply new zoning tools developed as part of the City's re-code LA project.

The update of the Downtown Community Plans takes cues from the City's General Plan. As stated above, the City's General Plan Framework Element is a long-term growth strategy for Los Angeles. It lays out goals, objectives, and policies for the range of land uses throughout the City, including Downtown and is used to guide the development of community plans. The Downtown Center, as it is referred to in the Framework Element, is described as the "principal government and business center of the region, with a worldwide market. It is the highest-density center of the City and hub of regional transportation."

DTLA 2040 will help shape the future of Downtown Los Angeles, by reinforcing its jobs orientation; supporting a transit and pedestrian environment; growing and supporting its residential community; strengthening the unique character of each neighborhood; and creating linkages between Downtown's many distinct districts.[63]

In addition to projecting future employment, housing, and population growth in Downtown Los Angeles, the following core principles represent the long-term priorities for the Downtown Community Plans:

- Accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner while supporting and sustaining Downtown's ongoing revitalization.
- Reinforce Downtown's jobs orientation.
- Grow and support the residential base.

63 City of Los Angeles DTLA 2040 Website: https://www.dtla2040.org/core-principles.html

- Strengthen neighborhood character.
- Promote a transit, bicycle, and pedestrian friendly environment.
- Create linkages between districts.
- Create a World-Class Streets and Public Realm.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the General Plan and Central City Community Plan is included in Appendix F of this Initial Study. As discussed therein, the Project would be consistent with General Plan policies to provide needed multi-family housing in an area already planned and built for high-density, multi-family housing. There is sufficient public infrastructure and services in the downtown area, and in the South Park district of Downtown in particular, to support the proposed residential tower with active street level commercial uses. The Project would provide much needed new housing options for area residents and workers. The location provides for a transit-friendly development, as the Project Site is located near a range of public transit options, including the Metro Rail Line Stations at Pico and Flower Street, which is served by the Metro A Line (Blue) and Metro E Line (Expo), and at 7th and Figueroa Street, which is served by the Metro A Line (Blue), Metro E Line (Expo), Metro B Line (Red), and Metro D Line (Purple), which includes a currently under construction extension with a terminus in Westwood. The Project Site is also served by the DASH, Santa Monica Big Blue Bus Rapid line, and other Metro bus lines. Bicycle parking (both long- and short-term) would also be provided by the Project. The Project thereby enables a more self-sufficient, pedestrian-oriented lifestyle that will reduce unnecessary vehicle trips in the vicinity and thereby enhance public convenience and general welfare. Therefore, the Project is consistent with the planned land use intensity in the Downtown Center near transit nodes and creates a pedestrian-oriented environment while promoting an enhanced urban experience and provide for places of living and employment.

City of Los Angeles General Provisions and Zoning Code

As stated earlier, the Project Site is located in the Central City Community Plan Area. The land use designation for the Project Site in the Community Plan is High Density Residential, which corresponds to the Project Site's zoning of [Q]R5-4D-O. The Project Site is located in Subarea 3035 of Ordinance No. 164,307, which establishes the "Q" condition and "D" limitation on the Project Site. The "Q" condition pertains to retail development and does not restrict the Project as proposed. The "D" limitation restricts the FAR to 6:1, with exceptions that include projects approved for a transfer of floor area (TFAR). There is also a General Plan Footnote, No. 3, on the Central City Community Plan that allows a TFAR request up to 13:1 for the Project Site. The Project would also comply with applicable setbacks, open space (see Table 3-1), vehicle parking (see Table 3-2), and bicycle parking (see Table 3-3) requirements. In addition, the Project would comply with the LAGBC, which is based on CalGreen. Therefore, with approval of the TFAR, as allowed by General Plan Footnote No. 3 and the "D" limitation, the Project would be consistent with the General Plan designation and zoning for the Project Site.

Conclusion

As demonstrated above and in the analysis contained in Appendix F of this Initial Study, the Project would not conflict with any applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Project impacts would therefore be less than significant, and further analysis of this topic in the EIR is not required.

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource, and if the project converted an existing or potential future regionally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is located within the Downtown Los Angeles Oil Field [64] but is not in a City-designated Mineral Resource Zone 2 Area (MRZ-2).[65] Therefore, the Project would have no impact with respect to loss of availability of a known regionally-important mineral resource, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

64 State of California, Department of Conservation, Division of Oil, Gas & Geothermal Resources Well Finder: http://maps.conservation.ca.gov/doggr/index.html#close, accessed May 31, 2019.

65 City of Los Angeles, Safety Element of the General Plan, Oil Fields and Oil Drilling Areas in the City of Los Angeles, Exhibit E.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction, and if the project converted an existing or potential future locally-important mineral extraction use to another use, or if the project affected access to a site used or potentially available for locally-important mineral resource extraction. Government Code Section 65302(d) states that a conservation element of the general plan shall address "minerals and other natural resources." According to the Conservation Element of the City of Los Angeles General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the flood plain from the San Fernando Valley through Downtown Los Angeles. The Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present,[66] and much of the area around the Project Site has been developed with structures and is inaccessible for mining extraction.[67] Furthermore, the Project Site is developed and located in an urbanized area. Redevelopment of the Project Site would therefore not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impact would occur, and no further analysis of this topic in the EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
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?	☒	☐	☐	☐

66 Conservation Element of the City of Los Angeles General Plan, September 16, 2001, Exhibit A.
67 Conservation Element of the City of Los Angeles General Plan, September 16, 2001; pg II-57.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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. 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?

Potentially Significant Impact. The Project Site is located in an urbanized area that contains various sources of noise. The Project Site is occupied by 8,000 square feet of general office uses with surface-level parking. Noise from the Project Site is generated by cars that access the parking lot from a driveway on Grand Avenue and a driveway from the rear alley, accessible from 12th Street. Occasional noise is generated from refuse and recycling trucks that manage solid waste from the carport area at the back of the Project Site. Existing off-site noise sources near the Project Site are typical of urban areas (e.g., roadway traffic, construction). Project construction activities would generate noise during the phased process that would span approximately 33 months of demolition, grading, building construction, and application of architectural coatings. The Project would require heavy equipment such as excavators, loaders, and other earthmoving vehicles during the excavation, grading, and shoring of the site for the subterranean garage structure. During other phases of construction (e.g., site preparation, building construction), smaller equipment, such as forklifts, generators, and various powered hand tools, would be used.

Sensitive receptors in the Project vicinity include, but are not limited to, the following:

- Hudson Loft film studios, 1200 South Hope Street, approximately 15 feet northwest of the Project Site across an alley.
- Evo multi-family residences, 1155 South Grand Avenue, approximately 65 feet northeast of the Project Site.
- G12 multi-family residences, 1200 South Grand Avenue, approximately 90 feet southeast of the Project Site.
- E on Grand multi-family residences, 1249 South Grand Avenue, approximately 200 feet southwest of the Project Site.
- Hope+Flower multi-family residences, 1201 South Hope Street, approximately 240 feet northwest of the Project Site.

- Aven Park multi-family residences, 1120 South Olive Street, approximately 250 feet northeast of the Project Site.
- Dignity Health – California Hospital Medical Center, 1401 South Grand Avenue, approximately 960 feet southwest of the Project Site.

The concurrent use of construction equipment has the potential to increase noise levels above the applicable standards of the City's Noise Ordinance. Therefore, the Project's noise impacts during construction would be potentially significant and will be analyzed further in the EIR.

During operation, the Project would produce noise from both on- and off-site sources. On-site sources of noise would include mechanical equipment, auto-related activities, and residential and restaurant uses (human conversation and activities, landscape maintenance, trash collection, and loading). The majority of the Project's off-site noise would consist of vehicle trips traveling to and from the Project Site. Operation of the Project has the potential to increase noise levels above the applicable standards of the City's Noise Ordinance. Therefore, the Project's noise impacts during operation would be potentially significant and will be analyzed further in the EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The Project would require the use of heavy construction equipment, such as excavators, that has the potential to cause groundborne vibration and noise. Sensitive receptors in the Project vicinity include, but are not limited to, the following:

- Hudson Loft film studios, 1200 South Hope Street, approximately 15 feet northwest of the Project Site across an alley.
- Evo multi-family residences, 1155 South Grand Avenue, approximately 65 feet northeast of the Project Site.
- G12 multi-family residences, 1200 South Grand Avenue, approximately 90 feet southeast of the Project Site.
- E on Grand multi-family residences, 1249 South Grand Avenue, approximately 200 feet southwest of the Project Site.
- Hope+Flower multi-family residences, 1201 South Hope Street, approximately 240 feet northwest of the Project Site.
- Aven Park multi-family residences, 1120 South Olive Street, approximately 250 feet northeast of the Project Site.
- Dignity Health – California Hospital Medical Center, 1401 South Grand Avenue, approximately 960 feet southwest of the Project Site.

The use of heavy construction equipment would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. The

Project's groundborne vibration and noise impacts during construction would therefore be potentially significant and will be analyzed further in the EIR.

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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. Both the Santa Monica Airport and the Los Angeles International Airport (LAX) are located approximately 10.5 miles from the Project Site. Therefore, the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels, and no impact would occur. No further analysis of this topic in the EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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. 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)?

Less Than Significant Impact. A significant impact may occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing population growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Environmental Setting

The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020–2045 RTP/SCS, reflecting SCAG's most current projections, includes the following proposed growth forecast for population, households, and employment for the City:[68]

- Population: 4,771,300 persons in 2045;
- Households: 1,793,000 households in 2045; and
- Employment: 2,135,900 jobs in 2045.

According to analysis by the State's Housing and Community Development Department, prior to the prior (2008) economic downturn and foreclosure crisis, California had experienced decades of undersupply of housing, contributing to significant price escalation and the affordability crisis.[69] The factors contributing to California's continuing housing supply and affordability problems include a chronic mismatch between the existing housing stock and the demand for housing by type and location; lack of sufficient housing construction to meet demand; and persistently high housing costs relative to household incomes, even with the effects of the prior national recession.

Almost all future California population and household growth is projected to and intended by various levels of government to occur in metropolitan areas, and most of that will occur in southern California. According to SCAG's 2020-2045 RTP/SCS, the City of Los Angeles is projected to add approximately 721,983 people and approximately 367,241 households between 2020 and 2045.

Table XIV-1 lists SCAG's forecasts for population, housing, and employment for the City, as contained in the 2020-2045 RTP/SCS.[70]

Existing Uses

The Project Site is located in the highly urbanized downtown area of the City, and is currently developed with an office building and surface parking lot.

68 SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14, page 35, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.

70 Employment information is provided for informational purposes only.

Table XIV-1
SCAG RTP/SCS Population, Housing, and Employment Forecasts for the City[1]

Year	Population	Households	Employment
2020	4,049,317	1,425,759	1,887,969
2025	4,193,714	1,499,207	1,937,555
2045	4,771,300	1,793,000	2,135,900

[1] Population, housing, and employment data for 2020 and 2045 are from SCAG's 2020-2045 RTP/SCS, Demographics and Growth Forecast, Table 14. Population, housing, and employment rate data for 2020 and 2025 (anticipated buildout year of the Project) were calculated based on a linear interpolation of the 2016 to 2045 projections.

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the development of up to 312 new residential multi-family dwelling units, and approximately 7,100 square feet of retail/restaurant uses. As discussed in the Transportation Assessment prepared for the Project (based on LADOT's VMT calculator), the Project would add a residential population of approximately 703 people to the Project Site and the Project's retail/restaurant uses would generate approximately 28 employees.

Population: As shown in Table XIV-2, below, compared to the anticipated population growth in the City between the 2020 baseline year and the Project's anticipated buildout year of 2025, the Project's residential population would represent approximately 0.49 percent of the total forecasted City population growth during that period. The Project's residential population would represent approximately 0.10 percent of the forecasted population growth between 2020 and 2045.

Housing: As shown on Table XIV-2, compared to the anticipated housing growth in the City between the 2020 baseline year and the Project's anticipated buildout year of 2025, the Project's housing units would represent approximately 0.42 percent of the forecasted City housing growth. The Project's housing units would represent approximately 0.08 percent of the forecasted housing growth between 2020 and 2045.

Employment: As shown on Table XIV-2**,** compared to the anticipated employment growth in the City between the 2020 baseline year and the Project's anticipated buildout year of 2025, the Project's employment would represent approximately 0.06 percent of the forecasted City employment growth. The Project's employment would represent approximately 0.01 percent of the forecasted employment growth between 2020 and 2045.

Table XIV-2
Project Growth Comparison to Growth Forecasts

Project Population, Housing, and Employment Growth	Forecast Citywide Growth[1]	Project % of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2020 to 2025 (Interpolated)		
703 residents	+144,397	0.49[2]
312 units	+73,448	0.42[3]
28 employees	+49,586	0.06[4]
As compared to SCAG Growth Forecast from 2020 to 2045		
703 residents	+721,983	0.10[5]
312 units	+367,241	0.08[6]
28 employees	+247,931	0.01[7]

[1] Refer to Table XIV-1.
[2] 703/144,397 x 100% = 0.49%.
[3] 312/73,448 x 100% = 0.42%.
[4] 28/49,586 x 100% = 0.06%.
[5] 703/721,983 x 100% = 0.10%.
[6] 312/367,241 x 100% = 0.08%.
[7] 28/247,931 x 100% = 0.01%.

The Project Site is already served by an existing roadway network and utility and public services infrastructure. The Project does not include the development of any new or extended roadways or other infrastructure that would be growth-inducing. As the Project's estimated population, housing, and employment generation would represent small portions of the forecasted growth in the City, and as the Project would not require the extension of roadways or other growth-inducing infrastructure, the Project would not indirectly or directly induce substantial population growth. Therefore, Project impacts related to population growth would be less than significant, and no further analysis of this issue in the EIR is required.

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

No Impact. A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating construction of replacement housing elsewhere. The Project Site is currently developed with a three-story office building and surface parking. The Project would not displace any housing or residents, as there

is no housing on the Project Site. Therefore, no impact would occur and no further analysis of this issue in the EIR is required.

XV. 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?	☐	☐	☒	☐

The analysis in this section is based on the following:

Appendix G-1 LAPD Response, Los Angeles Police Department, March 16, 2021.

Appendix G-2 LAUSD Response, Los Angeles Unified School District, July 24, 2020.

Appendix G-3 LADRP Response, Department of Recreation and Parks, October 1, 2020.

Appendix G-4 LAPL Response, Los Angeles Public Library, July 27, 2020.

a. Fire protection?

Less Than Significant Impact. A significant impact may occur if, as a result of LAFD not being able to adequately serve the Project with existing governmental facilities, there would be a need for a new or physically altered fire station to be constructed which would cause significant environmental impacts.[71] The need for, or deficiency in, adequate fire protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social

[71] *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.

and/or economic impact for which CEQA does not require further analysis.[72] The ultimate determination of whether there is a significant impact to the environment related to fire protection from a project is determined by whether construction of new or expanded fire protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the LAFD Central Bureau area and therefore the City cannot identify with specificity at this time the location or size of such facilities. Therefore, to the extent the Project would result in a need for new or expanded fire facilities, based on existing zoning standards, past practices, and historical development of City fire facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction

Construction and demolition activities associated with the Project could temporarily increase demand for fire protection. Such activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

Project construction activities would comply with all applicable federal, state, and City regulations related to fire safety, including federal regulations under the Occupational Safety and Health Acts (29 Code of Federal Regulations, Part 1926 Subpart F), the California Building Code (California Code of Regulations, Title 24), and the City's Fire Code (LAMC Chapter V, Article 7). To comply with California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) and Fire and Building Code requirements, construction managers and personnel will have training in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[73] Project demolition and construction activities would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Construction is a regular activity in Los Angeles and, as demonstrated by past practice, the LAFD is equipped and prepared to deal with construction-related fire impacts should they occur, and no aspect of this Project raises the potential for unusual fire risks during construction to which the LAFD would be unable to respond.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required

72 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.

73 Cal. Code of Regs., tit. 8, § 1920.

for improvements to the adjacent sidewalks and off-site utility connections) and travel lanes would be maintained in each direction on all public streets around the Project Site throughout the construction period, and emergency access would not be impeded. Further, the Project would be required to implement a Construction Traffic Management Plan, which would include traffic management strategies, and ensure that adequate and safe access for LAFD remains available within and near the Project Site during construction.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access and response times. However, a Construction Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. The majority of construction-related traffic, including deliveries, hauling activities, and construction worker trips, would occur outside the typical weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts and the slowing of emergency response times. In addition, temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period, and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections).

Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. Finally, construction is a temporary condition which would not itself require the construction of specific new governmental facilities to maintain adequate fire protection services.

The Project is similar to other construction projects, including those currently under construction, recently completed, or extant within the Central Bureau area, uses standard materials and construction practices similar to such projects, and as a result, LAFD possesses sufficient equipment, knowledge, and resources to addresses any concerns related to fire protection from the Project. Furthermore, as discussed above, the Project would comply with relevant regulations for workplace safety, best management practices for material use and storage, and ensuring emergency access to the site.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project construction would be less than significant, and no further analysis of this topic in the EIR is required.

Operation

Project residents, employees, and visitors to the Project Site could potentially increase the demand for LAFD services during operation of the Project.

As discussed in Section 3, Project Description, the Project proposes up to 312 residential units and 7,100 square feet of commercial space (retail/restaurant uses). Based on the uses currently occurring at the Project Site, the Project Site currently generates a low demand for LAFD fire protection services. Once completed, the Project would increase the building area and both the daytime and nighttime population of the Project Site compared to existing conditions. As such, the Project would increase the demand for LAFD fire protection services within LAFD's Central Bureau.

The proposed Project-related operational uses at the Project Site would be expected to generate a range of fire service calls similar to other such uses, including kitchen/house fires, garbage bin fires, car fires, and electrical fires. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that utilize or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest to the Project Site.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are implemented during Project operation. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

The factors that the LAFD considers in determining whether fire protection services for a project are adequate include whether the project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement.

Pursuant to LAMC Section 57.09.07, the maximum response distance between a high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this maximum distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. LAFD Station No. 10, located at 1335 South Olive Street, which is approximately 0.2 miles south of the Project Site, would serve the Project Site. Station No. 10 is equipped with an Engine Company, Task Force, and Rescue Ambulance. The response distance does not exceed the 1.5-mile distance prescribed by LAFD.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e., Grand Avenue and 12th Street) and would be maintained at all times during both Project construction and operation. All ingress/egress associated with the Project would be

designed and constructed in conformance to all applicable City Department of Building and Safety and LAFD standards and requirements for design and construction.

Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check building permit process. Furthermore, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project resulting from the construction or alteration of fire facilities, and the obligation to provide adequate fire protection is the responsibility of the City. The City meets this constitutional requirement by preparing for long-term growth and demographic changes. The City along with LAFD continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Objective 6-1 of the Central City Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Further, LAFD has identified future strategies in their 2018-2020 Strategic Plan as critical goals to continue to provide excellent service and meet future needs. These strategies consist of better integration of technology in dispatch, vehicle location systems, and staffing as a key component of LAFD's strategy. LAFD is adapting more advanced technological strategies to deploy resources and address life safety issues, maximizing existing resources. LAFD continues to improve and provide for adequate fire protection services, and the Project would not trigger any requirements outlined which would necessitate the need for additional or expanded fire protection facilities. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAFD emergency response.

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of, or 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 related to fire protection. Therefore, impacts to fire protection during Project operation would be less than significant, and no further analysis of this topic in the EIR is required.

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.[74] The need for, or deficiency in, adequate police protection services as a result of the Project is not in and of itself is a potentially significant impact, but rather a social and/or economic impact for which CEQA does not require further analysis.[75] The ultimate determination of whether there is a significant impact to the environment related to police protection from a project is determined by whether construction of new or expanded police

74 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.
75 *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833, 847.

protection is a direct physical change or a reasonably foreseeable indirect change in the environment caused by the Project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Central Community Police Station area and therefore the City cannot identify with specificity at this time the location or size of such facilities. Therefore to the extent the Project would result in a need for new or expanded police facilities, based on existing zoning standards, past practices, and historical development of City police facilities, the City makes the following assumptions: such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 and/or a Mitigated Negative Declaration.

Construction and operation of new buildings can result in additional calls for service from the Los Angeles Police Department (LAPD). The Project includes proposed construction methods and building uses currently widespread in the City of Los Angeles, which LAPD has sufficient specialized equipment and training with which to respond. LAPD dispatches resources dynamically, with officers responding from the field, patrols, or facilities depending on their location at the time. Due to the nature of dispatching police calls for service, facilities are not the limiting factor in responding to calls for service, but rather equipment and staffing as police are infrequently in one location for extended periods of time. LAPD continually evaluates their equipment and staff levels, making adjustments as necessary, with a focus towards advanced technology, operational efficiencies, community involvement, and advanced training to maximize current resources community involvement, as outlined in the LAPD Strategic Plan, *LAPD 2020 & Beyond.*[76] Due to the unpredictable nature of deploying resources, developments such as advanced equipment in vehicles, improved access to digital resources in vehicles, and advanced mobile phone capabilities all allow for a more mobile and dynamically deployed workforce. These advances, such as in car computers, mobile phone advancements, mapping and navigation improvements, and dispatch center advancements allow for resources to be deployed from the field rather than a static office or station. The Project would not introduce physical obstructions, inhibiting the LAPD, nor would the uses contain novel activities that would require new police facilities to adequately ensure public safety. The Project would also comply with relevant laws, as well as industry standards in securing the property during both construction and operation. The Project would include security measures during operation, such as secured access, closed circuit video surveillance, security alarm systems, and ample lighting. The Project would not constitute a novel arrangement of uses or use type which would require the construction of altered or new specialized facilities.

The Project Site is located within the LAPD's Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station located at 251 East 6th Street is approximately 1.4 miles driving distance from the Project Site.

76 http://lapd-assets.lapdonline.org/assets/pdf/Strategic%20Plan%202019-2021.pdf

The Central Community Police Station service area is approximately 4.5 square miles and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The boundaries of the Central Community Police Station Area are as follows: the Pasadena/Harbor Freeway (I110/SR 110) to the north and west, Washington Boulevard and 7th Street to the south, and Metrolink Railroad Tracks to the east. The Central Community Police Station is staffed by approximately 397 sworn personnel and 19 civilian support staff,[77] with associated equipment. LAPD has identified the need for more reserve officers in its Strategic Plan, and identifies staffing needs yearly during the budgeting process. New staffing is subject to approval by the City Council and is based on a complex set of socio-economic factors, which are outside the purview of CEQA. Changes in LAPD staffing levels do not typically result in substantial adverse physical impacts on the environment. The Project Site is located within the densely developed South Park area, with similar residential and commercial uses as the Project, and a dedicated officer population. The Project would therefore not introduce population to an area not served by a police station or an area otherwise not currently served by existing police services, and therefore the Project would not require new facilities or staffing requiring dedicated facilities.

Furthermore, the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Based on this analysis, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction, and would not inhibit LAPD emergency response. Finally, according to the LAPD (see correspondence contained in Appendix G-1 of this Initial Study), "there are no special police protection requirements needed by law enforcement because of the specific attributes of this Project Site" and "the 1201 S. Grand Project, individually or combined with other past, present, or future projects, will not result in the need for new or altered police facilities."

In conclusion, as described above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, Project impacts would be less than significant, and no further analysis of this topic in the EIR is required.

c. Schools?

Less Than Significant Impact. A significant impact may occur if a project results in the need for new or expanded government facilities, the construction of which would result in environmental impacts. In assessing impacts related to schools, Appendix G will be used as a threshold of significance, with factors identified in the *L.A. CEQA Thresholds Guide* to aid in the determination and analysis of Project impacts. The *L.A. CEQA Thresholds Guide* includes the following factors:

77 Los Angeles Police Department, correspondence dated March 16, 2021, included in Appendix G-1 of this Initial Study.

(a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available (considering, as applicable, scheduled improvements to Los Angeles Unified School District (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 which 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).

According to LAUSD (see correspondence contained in Appendix G-2 of this Initial Study), the Project area is currently served by the following LAUSD public schools: 9th Street Elementary School, located at 835 Stanford Avenue, which serves kindergarten through fifth-grade students; and John Liechty Middle School, located at 650 S. Union Avenue, which serves sixth- through eighth-grade students. Prospective students would have a choice of the following LAUSD high schools: Belmont High School, located at 1575 W. 2nd Street; Miguel Contreras Learning Complex, located at 322 Lucas Ave; Ramón C. Cortines School of Visual and Performing Arts, located at 450 N Grand Avenue; and Edward R. Roybal Learning Center, located at 1200 Colton Street, which all serve ninth- through twelfth-grade students. Table XV-1 provides the enrollment and capacity for each of these schools.

Table XV-1
LAUSD Schools Enrollments and Capacities

Name	Current Capacity	Resident Enrollment	Actual Enrollment	Current Overage/ (Shortage)	Overcrowded Now? [5]	Projected Enrollment	Future Overage/ (Shortage)	Overcrowding Future?
9th Street Elementary	375	292	347	83	**No**	353	22	**No**
Liechty Middle School	1,191	1,674	983	(483)	**Yes**	1,762	(571)	**Yes**
Belmont High School Zone	6,594	6,925	4,967	(331)	**Yes**	6,641	(47)	**Yes**
Contreras LC ALC	567	-	454	-	-	-	-	**-**
Cortines Sch of VAPA	1,515	-	1,289	-	-	-	-	**-**
Contreras LC Bus Tr	537	-	446	-	-	-	-	**-**
Contreras LC Soc Jus	553	-	453	-	-	-	-	**-**
Belmont High School	1,572	-	954	-	-	-	-	**-**
Roybal LC	1,443	-	1,023	-	-	-	-	**-**
Contreras LC Glbl St	407	-	353	-	-	-	-	**-**

Source: LAUSD, Vincent Maffei, Interim Director, School Management Services/Master Planning & Demographics, July 24, 2020 (correspondence contained in Appendix G-2 of this Initial Study).

As shown in Table XV-2, the Project would generate approximately 71 elementary students, 19 middle school students, and 40 high school students, for a total of approximately 130 students. It is likely that some of the students generated by the Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD.

Table XV-2
Project Estimated Student Generation

Land Use	Size	Elementary School Students*	Middle School Students*	High School Students*	Total Students
Residential Units	312 du	71	19	40	130
Total Students		**71**	**19**	**40**	**130**

Notes:
du = dwelling units
- Student generation rates are as follows for residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.

Source: Los Angeles Unified School District, School Fee Needs Analysis, March 2017.

A conservative analysis of Project impacts on student generation (e.g., that all Project students would represent new enrollment at the local LAUSD schools) indicates that the elementary, middle, and high schools serving the Project Site would be over-crowded, as shown in Table XV-3. The increase in elementary, middle, and high school students above the school capacity is a potentially significant impact.

Table XV-3
Impacts on LAUSD Schools

School	Future Overage/ (Shortage)	Project-Generated Students	Resulting Overage/ (Shortage)
9th Street Elementary	22	71	**(49)**
Liechty Middle School	(571)	19	**(590)**
Belmont High School Zone	(47)	40	**(87)**

Source: LAUSD, Vincent Maffei, Interim Director, School Management Services/Master Planning & Demographics, July 24, 2020 (correspondence contained in Appendix G-2 of this Initial Study).

Note: The Belmont High School Zone includes Belmont High School, Miguel Contreras Learning Complex, Ramon C. Cortines School of Visual and Performing Arts, and Edward R. Roybal Learning Center.

However, the Project would be required to pay school facilities fees pursuant to SB 50, which would be used to construct facilities. According to LAUSD, additional facilities are necessary to serve overall student enrollment growth district-wide. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by Education Code Section 17620 or Government Code Sections 65970 and following may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. Pursuant to Government Code Section 65995(h), the payment of the development fees authorized by Education Code Section 17620 is "full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities."[78] Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to address a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of SB 50 are deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA, or other State or local law. The Project Applicant will be required to pay mandatory developer fees to offset the Project's demands upon

78 Cal Gov Code Section 65995: http://codes.lp.findlaw.com/cacode/GOV/1/7/d1/4.9/s65995.

local schools. Thus, the Project's potential impact upon public school services would be less than significant, and no further analysis of this issue in the EIR is required.

d. Parks?

Less Than Significant Impact. A significant impact may occur if the available City of Los Angeles Department of Recreation and Parks (LADRP) recreation and park services could not accommodate a project, necessitating new or physically altered facilities, the construction of which could cause significant environmental impacts. The LADRP manages all municipally owned and operated recreation and park facilities within the City. According to LADRP (see correspondence contained in Appendix G-3 to this Initial Study), the following neighborhood parks are located within a two-mile radius of the Project Site:

- 6th and Gladys Street Park, located at 624 E. 6th Street.
- Alvarado Terrace Park, located at 1342 S. Alvarado Terrace.
- City Hall Park, located at 200 N. Spring Street.
- Francis Avenue Community Garden, located at 2909 W. Francis Avenue.
- Grand Hope Park, located at 900 S. Hope Street.
- Hope and Peace Park, located at 843 S. Bonnie Brae Street.
- Leo Politi Elementary Community School Park, located at 2481 W. 11th Street.
- Patton Street Pocket Park, located at 303-305 and 317-327 N. Patton Street.
- Pico Union Park, located at 1827 S. Hoover Street.
- Richardson Family Park, located at 2700 S. Budlong Avenue.
- Rockwood Community Park, located at 1571 W. Rockwood Street.
- Saint James Park, located at 20 S. Saint James Park.
- San Julian Park, located at 312 E. 5th Street.
- Spring street Park, located at 428 S. Spring Street.
- Unidad Park, located at 1644-1648 W. Beverly Boulevard.
- Valencia Triangle, located at 1425 W. 8th Street.

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

reached during the life of the plan, and therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons for neighborhood parks and one acre per 1,000 persons for community parks, or two acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

The Project Site is located within a highly urbanized area of the City that has access to park and recreational facilities listed above. As stated previously, it is estimated that the development of the Project would result in an increase of approximately 703 new residents to the Central City Community Plan area. Based on the long-term parkland ratio goal of four acres per 1,000 residents, the Project would generate a need for approximately 2.81 acres of public parkland.[79] The Project would provide approximately 32,837 square feet of open space for residents of the project. The Project would be subject to the applicable provisions of LAMC Sections 12.33 and/or 17.12, requiring the payment of Quimby and/or Finn fees to the City of Los Angeles, or LAMC Section 21.10.3(a)(1) requiring payment of a Dwelling Unit Construction Tax. Payment of the required fees would help offset the Project's demand on parks and recreational facilities and the fees could be used to acquire additional parkland or improve current park facilities. Thus, the Project's impact upon parks and recreational facilities would be less than significant, and no further analysis of this issue in the EIR is required.

e. Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project results in the need for new or expanded government facilities, the construction of which would result in environmental impacts. In assessing the impacts related to libraries, Appendix G will be used as a threshold of significance, with factors identified in the *L.A. CEQA Thresholds Guide* to aid in the determination and analysis of Project impacts. The *L.A. CEQA Thresholds Guide* includes the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available (considering, as applicable, scheduled improvements to existing library services [renovation, expansion, addition or relocation] and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches, and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include the Central Library, located at 630 W. 5th Street, approximately 0.8 miles northeast of the Project Site and the Little Tokyo Branch Library located at 203 S. Los Angeles Street, approximately 1.3 miles northeast of the Project Site. Table XV-4, below, lists these libraries and their corresponding volumes and circulation.

[79] 703 residents x 4 acres/1,000 residents = 2.81 acres.

Table XV-4
Los Angeles Public Libraries in Project Vicinity

Name	Address	Size (sf)	Volumes / Circulation	Current Service Population	Staff
Richard J. Riordan Central Library	630 W. 5th St.	538,000	2,896,316 / 498,269	3,951,591	195
Little Tokyo Branch	203 S. Los Angeles St.	12,500	65,506 / 98,231	48,889	8
Source: LAPL, July 27, 2020 (correspondence contained in Appendix G-4 of this Initial Study).					

The LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square-foot facilities for communities with less than a population of 45,000 and 14,500 square-foot facilities for communities with a population of more than 45,000. At 500,000 square feet, the Central Library far exceeds these criteria and currently meets the library demands of the surrounding community. The projected 703 new residents would not result in the Central Library exceeding this criteria, and any renovations or expansions would be part of the regular budgetary process for capital improvements for LAPL.

As described above, the Project would also generate approximately 28 employees. Employees of mixed-use developments do not typically frequent libraries during work hours but are more likely to use libraries near their homes during non-work hours. Therefore, Project employment generation would also not result in the need for new or expanded facilities.

Overall, the Project would not generate a substantial number of new residents or employees, which would create the need to construct a new branch library, or expand current facilities, thus, no impacts from construction of new or expanded facilities would occur. Therefore, no further analysis of this topic in the EIR is required.

XVI. 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 facilities would occur or be accelerated?

Less Than Significant Impact. As discussed in Section XIV, Population and Housing, the Project would generate approximately 703 residents. Employees generated by the Project would not typically spend long periods of time during the workday to visit parks and/or recreational facilities and would therefore not contribute to the future demand on recreational facilities.

As discussed above in Section XV, Parks, per the Public Recreation Plan (PRP) long-range Citywide standard (two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks), the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 persons. Based on the combined neighborhood and community parkland per population ratio of four acres per 1,000 persons, the Project would generate demand for approximately 2.81 acres of new neighborhood and community parkland.

Additionally, the City's parkland acreage-to-population ratios are based on residential population and not employee population. A significant impact may occur if a project includes substantial population growth that could generate a demand for parks or recreational facilities that exceed the capacity of existing parks or recreational facilities and cause premature deterioration of the facilities.

Project amenities for the residential community include a landscaped roof deck and an indoor amenity space, outdoor and indoor lounge and recreation space, a fitness room, and swimming pool. Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50 dwelling units may be required to dedicate land, make park

improvements, pay a park fee, or provide a combination of land dedication and park fee payment. The LADRP is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, and issuing the fee calculation letters to Project applicants. In addition to requirements of LAMC Section 17.12 regarding park fees, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1). Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to Ordinance 184,505, and would address any impact the Project will have on public resources such as parks and recreational facilities.[80] The payment of this fee is deemed to fully address impacts to parks and recreational facilities. In addition, the Project would provide approximately 32,837 square feet of open space to serve the recreational needs of the Project residents. Therefore, impacts to parks and recreational facilities would be less than significant, and no further analysis of this topic in the EIR is required.

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 may occur if a project includes the construction or expansion of park facilities, the construction of which could have a significant adverse effect on the environment. The Project would provide 32,837 square feet of open space, including a landscaped roof deck and an indoor amenity space, outdoor and indoor lounge and recreation space, a fitness room, and swimming pool. However, as discussed above, the Project would generate demand for approximately 2.81 acres of new neighborhood and community parkland. As also discussed above, regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50 dwelling units may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. These fees are calculated by LADRP, pursuant to Ordinance 184,505, and would address any impacts the Project would have on public resources such as parks and recreational facilities. The payment of this fee is deemed to fully address impacts to recreational facilities. Therefore, Project impacts to recreational facilities would be less than significant.

In addition, the Project does not include the construction of recreational facilities outside of the Project Site boundaries, such as a park, and therefore no impact would occur with respect to this portion of the threshold.

Overall, Project impacts would be less than significant and no further analysis of this issue in the EIR is required.

[80] City of Los Angeles Department of Recreation and Parks – Park Fees: https://www.laparks.org/planning/park-fees

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐

The analysis in this section is based on the following:

Appendix H-1 Transportation Assessment Study, Raju Associates, Inc., May 2020.

Appendix H-2 Transportation Assessment Letter, LADOT, June 22, 2020.

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

Less Than Significant Impact. This threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans, and policies.

Table 7 of the Transportation Assessment (included as Appendix H-1 of this Initial Study) provides the responses to the list of questions provided in the City's *Transportation Assessment Guidelines Table 2.1-2*. Table 7 includes two sections with lists of questions and the Project responses to these questions. The first section includes questions regarding *"Existing Plan Applicability,"* while

the second section includes questions regarding *"Access: Driveways and Loading."* The following provides a summary of the Project's consistency with each applicable plan:

- City of Los Angeles' Mobility Plan 2035 – Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. The Plan's five goals include "Safety First, Access for all Angelenos, World Class Infrastructure, Collaboration, Communication, and Informed Choices, and Clean Environments & Healthy Communities." The Project would be consistent with the policies of the Mobility Plan 2035. Specifically, the Project is within the Pedestrian Enhanced Network and Bicycle Enhance Network. It is identified as a Tier 4 Transit Oriented Community. The Project does not propose paving, narrowing, or shifting existing parkway. The Project is providing approximately 19 short-term bicycle racks on Grand Avenue along the Project's frontage, as well as approximately 157 long-term bicycle spaces. The Project does not create a cul-de-sac and is not located adjacent to an existing cul-de-sac. The alley would provide the primary access to the Project Site via two driveways. The driveways and loading area would be designed consistent with the Mobility Plan 2035. Lastly, the Project would be providing the required sidewalk widths along the Project's Grand Avenue and 12th Street frontages, consistent with the Mobility Plan 2035 and the City's Downtown Design Standards.

- Designing A Healthy LA – Designing A Healthy LA emphasizes a shift from the current primary mobility mode, single-passenger vehicles, to favoring multiple modes of mobility, including rail, bus, bikes, and walking. This document contains recommendations that affect the physical design of the City including walkability, bikeability, active transit, and public open space. A brief summary of these recommendations include: sidewalks that provide for a safe pedestrian mobility route; pedestrian amenities to create a pedestrian friendly environment; visual interest promotes pedestrian activity; bike networks comprised of a variety of types of bike paths for the different conditions needed throughout Los Angeles; safer bike routes to attract more users and limit injuries; bike parking to accommodate long-term and short-term use; transit stops incorporating adequate facilities to ensure that the user has a positive experience; appropriate land use and activity to support transit bolsters functionality; and strengthening the relationship and connectivity between multiple modes of transportation to increase its functionality. In alignment with Designing A Healthy LA, the Project does not propose paving, narrowing, or shifting existing sidewalk placement. Nor does the Project propose more driveways than required by the City maximum standard. Therefore, the Project does not obstruct the policies and standards of the Designing A Healthy LA.

- Los Angeles Municipal Code Section 12.37: Waivers of Dedications and Improvement – The Project Site is a corner lot, located at the southwest corner of S. Grand Avenue (Modified Avenue II)/W. 12th Street (Modified Collector). The Project Site is zoned R5. The Project does not include additions or new construction along a street designated as a Boulevard I or II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone. Therefore, the Project is consistent with Los Angeles Municipal Code Section 12.37:

Waivers of Dedications and Improvement.

- Los Angeles Municipal Code Section 12.26J: TDM Ordinance – The TDM Ordinance establishes trip reduction requirements for non-residential projects in excess of 25,000 square feet. As the Project only includes 7,100 square feet of retail/restaurant uses, the Project would not be required to comply with the TDM Ordinance.

- LADOT's Manual of Policies and Procedures Section 321: Driveway Design - Per LADOT's Manual of Policies and Procedures, Section 321, it is recommended that two-way driveways serving multi-family and commercial uses are no more than 30 feet in width. Consistent with Section 321, the Project's driveway will be installed according to LADOT standards. The Project is proposing two driveways along the alley measuring no more than 30 feet wide. The Project does not propose more driveways than required by the City maximum standard.

- Vision Zero – The Project is not located along a roadway identified in the City's High Injury Network. However, the Project has taken measures to align with Vision Zero policies. As such, the Project does not propose paving, narrowing, or shifting existing sidewalk placement. The Project is providing short-term bicycle racks on Grand Avenue along the Project's frontage. The adjacent alley will provide primary access to the Project Site.

- City Design Guidelines (CDG) – The Project Site is included on a corner lot. Consistent with CDG Guideline 2, the Project's parking and driveways are located toward the rear or side of buildings and away from the public right-of-way and oriented as far from the corner as possible. The adjacent alley will provide primary access to the Project Site and the Project does not introduce a new driveway or loading access along an arterial (Avenue or Boulevard).

- Sustainability pLAn 2019 – Mobility goals of Sustainability pLAn 2019 include increasing the percentage of all trips made by walking, biking, micro-mobility / matched rides or transit; reduce VMT per Capita; and Ensure Los Angeles is prepared for Autonomous Vehicles (AV) by the 2028 Olympic and Paralympic Games. The Project does not propose paving, narrowing, or shifting existing sidewalk placement. Therefore, the Project does not obstruct the policies and standard of the Sustainability pLAn 2019.

- Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) – The TOC Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC 12.22 A.31. The Project Site is identified as Transit Oriented Community - Tier 4. However, the Project is not seeking TOC incentives.

Based on the review of relevant policies and programs provided above, the Project generally conforms with, and does not obstruct or impede the City's development policies and standards. Further, the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities.

Finally, the Project would not preclude or otherwise physically obstruct the City from implementing any of the applicable adopted programs, plans, and policies. All vehicular access to the Project would be provided from two full-access driveways along the adjacent alley on the west side of the Project Site. Consistent with LADOT Manual of Policies and Procedures Section 321 – Driveway Design Guidelines, the Project is proposing two driveways along the alley measuring no more than 30 feet wide. The northerly driveway would provide access to the above-grade parking levels while the southerly driveway would provide access to the subterranean parking levels. Therefore, Project impacts would be less than significant and no further analysis of this topic in the EIR is required.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. Per impact criteria established by the City, development projects would have a potential impact if a project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, VMT impacts measured for the work trip element result in a metric that exceeds the criteria for office projects listed above.

The Project is located within the Central APC area. Based on the City's VMT impact criteria, the significance threshold for the Project is a daily household VMT per capita of 6.0.

Utilizing the City's VMT Calculator Tool (V1.2), the VMT analysis for the Project was prepared. The Project's proposed land uses along with the existing land use were input into the City's VMT Calculator Tool. Based on the calculation worksheets contained in Appendix H of this Initial Study, the Project would result in a daily VMT of 7,602 and a household VMT per capita of 5.6 (see Table XVII-1, below). Since the Project's resulting household VMT per capita of 5.6 is less than the impact criteria threshold of 6.0, Project impacts would be less than significant and no further analysis of this topic in the EIR is required.

Table XVII-1
Project VMT Summary

Proposed Uses	Size	Daily VMT	Household VMT per Capita	Household VMT Impact (6.0)?	Work VMT per Employee	Work VMT Impact (7.6)?
Apartments High-Turnover Restaurant	312 du 7,100 sf	7,602	5.6	No	N/A	No
Source: Transportation Assessment, Raju Associates, Inc., May 2020.						

c. 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. Current access to the Project Site is provided by a driveway located along Grand Avenue and a driveway located along the adjacent alley. The Project does not propose any driveways along Grand Avenue or 12th Street. The Project proposes to remove the driveway along Grand Avenue and provide two driveways along the adjacent alley that connects Pico Boulevard and W. 12th Street and beyond, west of the Project Site. Pico Boulevard and 12th Street would provide access to the Project driveways both via the alley.

As stated above, all vehicular access to the Project would be provided from two full-access driveways along the adjacent alley on the west side of the Project Site. Consistent with LADOT Manual of Policies and Procedures Section 321 – Driveway Design Guidelines, the Project is proposing two driveways along the alley measuring no more than 30 feet wide. The northerly driveway would provide access to the above-grade parking levels while the southerly driveway would provide access to the subterranean parking levels.

The City of Los Angeles' Citywide Design Guidelines, October 24, 2019, suggest that the Project driveway(s) be located as far away from the corner as possible and located potentially towards the side of the building (for a corner lot property), away from public right-of-way and major pedestrian thoroughfares, thereby enhancing walkability and pedestrian network connectivity. The Project driveways are consistent with the Citywide Design Guidelines and enhance pedestrian walkability and safety by removing the existing driveway along Grand Avenue and providing them along the adjacent alley far away from the corner.

Pedestrian access to the Project Site would be obtained from Grand Avenue and 12th Street. Grand Avenue currently provides a 17-foot sidewalk (designated width per City of Los Angeles' Mobility Plan 2035). The Project would provide a 20-foot wide sidewalk along the Project's Grand Avenue frontage pursuant to Bureau of Engineering requirements. Short-term bicycle racks would be provided adjacent to the curb along the Project's Grand Avenue frontage. The Project would provide a 15-foot by 15-foot corner dedication, per Los Angeles Bureau of Engineering (BOE) requirements.

12th Street currently provides a curb-to-curb roadway width of 40 feet and a 10-foot sidewalk along the Project's frontage. Per the City of Los Angeles' Mobility Plan 2035, a designated right- of-way width of 64 feet (half ROW of 32 feet) is identified for 12th Street. The Project would provide a 2-foot dedication along its 12th Street frontage in order to meet the ROW standard contained in the Mobility Plan 2035. The sidewalk along the Project's 12th Street frontage would be widened to the required dimension of 12 feet. The Project would provide a 5-foot parkway/7-foot sidewalk along its 12th Street frontage.

A bike lane exists on the west side of Grand Avenue along the Project frontage. The removal of the existing site driveway along Grand Avenue removes potential vehicle/bicycle, vehicle/pedestrian, and vehicle/vehicle conflicts, improving the overall safety along this section of Grand Avenue.

Per impact criteria established by the City, preliminary Project access plans were reviewed using acceptable traffic engineering design standards to ascertain whether any deficiencies are apparent in the site access plans that could be considered significant. The following analysis is presented:

- The relative amount of pedestrian activity at Project access points.

  Project Impact: The Project driveways would be located along the adjacent alley where minimal pedestrian activity is anticipated. No deficiencies are apparent and therefore, not considered significant.

- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.

  Project Impact: The Project driveways are located along an adjacent alley located on the west side of the proposed building. Pedestrian activity along the alley is very minimal at the Project access points. Further, the Project is providing a 15-foot by 15-foot corner dedication at the southwest corner of Grand Avenue and 12th Street that would improve visibility to pedestrians and bicyclists. Visibility of potential vehicle/bicycle, vehicle/pedestrian, and vehicle/vehicle interactions are also improved. The Project would provide a 2-foot dedication along its 12th Street frontage, providing a 12-foot wide (required width) sidewalk/parkway. The Project design features/physical configurations do not negatively affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists. No deficiencies are apparent and therefore, Project impacts are not considered significant.

- The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.

Project Impact: An existing driveway along Grand Avenue (where a bicycle lane exists and a Tier 1 Protected Bicycle Lane is proposed) will be removed as part of the Project, thereby removing a driveway crossing a bicycle lane. The Project driveways are located along an adjacent alley, west of the site and do not cross bicycle facilities. No deficiencies are apparent and therefore, Project impacts are not considered significant.

- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

  Project Impact: No physical conditions of the Project Site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts have been identified. No deficiencies are apparent and therefore, Project impacts are not considered significant.

- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.

  Project Impact: The Project is not located along any High Injury Network streets nor are any Project-related changes to the public right-of-way that would negatively affect Safe Routes to School program area. No deficiencies are apparent and therefore, Project impacts are not considered significant.

- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

  Project Impact: No other conditions, including the presence of incompatible uses in the vicinity that would substantially increase a transportation hazard, have been identified. No deficiencies are apparent and therefore, Project impacts are not considered significant.

Based on a review and consideration of the proposed site plan, Project description, and the above analysis, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, Project impacts would be less than significant, and no further analysis of this issue in the EIR is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. This threshold reviews whether or not a project's elements would have a detrimental effect on emergency vehicle response times. Emergency vehicular access to the Project Site would be maintained from Grand Avenue and 11th Street. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access both during construction as well as after completion of the Project. Compliance with applicable City

Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access both during and operation. Drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes (on two-way streets) to pass through crowded intersections or streets. Accordingly, the respect entitled to emergency vehicles and driver training allows emergency vehicles to negotiate typical street conditions in urban areas. As such, emergency access to the Project Site and surrounding area would be maintained both during Project construction and operation. Therefore, the Project would not result in inadequate emergency access during construction or operation, and, as such, impacts to emergency access during construction and operation of the Project would be less than significant. No further analysis of this issue in the EIR is required.

XVIII. 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.	☐	☐	☒	☐

The analysis in this section is based in part on the following:

Appendix I-1 Sacred Lands File Search, Native American Heritage Commission, June 25, 2018.

Appendix I-2 Tribal Cultural Resources Technical Memorandum, SWCA Environmental Consultants, March 22, 2021.

a. 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: 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)?

Less Than Significant Impact. As discussed above, the Project includes the removal of the existing office building, which as part of the SurveyLA findings, was assigned a California Register status code of 3CS, which means "appears eligible for the California Register through a survey evaluation." The property was additionally assigned a status code of 5S3, which means "appears to be individually eligible for local listing or designation through a survey evaluation." When the existing building was constructed, it was an auto showroom and service facility in the International style, with observant Art Deco features. Therefore, the existing building would not be considered a tribal cultural resource as defined in Public Resources Code Section 21074. Therefore, no impact would occur, and no further analysis of this topic in the EIR is required.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A 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. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That

consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

The Project will comply with all required notification and consultation under AB 52. Under AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Notification requesting consultation from tribal governments was issued on October 19th, 2020, with no requests for consultation received by November 19, 2020 (30 days from the date of receipt of notification).

A Sacred Lands File (SLF) search was conducted with the NAHC (included in Appendix I-1 of this Initial Study) with negative results. In addition, SWCA Environmental Consultants prepared a tribal cultural resources technical memorandum for the Project (included in Appendix I-2 of this Initial Study) to analyze the likelihood for unknown tribal cultural resources to be present in the Project Site. SWCA's review found that while there are known significant Native American village sites located in the general vicinity, such as Yaanga and Rancheria de los Pipimares, the Project Site is not located near enough or in a comparable environmental setting to suggest an increased likelihood for associated tribal cultural resources within the Project Site. The Project Site is set within what has been a broad floodplain of the Los Angeles River for which there are only generalized indicators of former use by Native Americans such that substantial material deposits are likely to have occurred. These generalized indicators include a reasonable proximity to former stream courses and important natural resources that occur in higher densities near waterways. Late Pleistocene and early Holocene-aged alluvium below the artificial fill within the Project Site appears to be relatively favorable for preservation of buried tribal cultural resources; however, the impacts to the near-surface from historic-period developments and the fact that most of the Los Angeles Basin is composed of alluvium from this time period, suggest decreased levels of sensitivity. Based on these findings, the sensitivity for tribal cultural resources is considered low.

While unlikely, it is possible that unknown tribal cultural resources could exist at the Project Site and could be encountered during the excavation required for the proposed subterranean parking levels. Should tribal cultural resources be inadvertently encountered, the Project would comply with the City's standard condition of approval for inadvertent discovery, which provides for temporarily halting of construction activities near the encounter and the Project's certified construction monitor notifying the City and Native American tribes that have informed the City that they are traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the

treatment and disposition of any discovered tribal cultural resources. Therefore, potential impacts with respect to tribal cultural resources would be less than significant and no further analysis of this topic in the EIR is required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 reasonably 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?	☐	☐	☒	☐

The analysis in this section is based on the following:

Appendix G-5 LADWP Response, Los Angeles Department of Water and Power, July 13, 2020.

Appendix G-6 LASAN Response, Bureau of Sanitation, June 17, 2020.

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?

Less Than Significant Impact. As discussed below, Project impacts related to these topics would be less than significant.

Water

Treatment

The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 million gallons per day (mgd), with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. As shown on Table XIX-1, the Project would result in an increase of approximately 128,938 gallons of water per day (or 0.13 mgd). With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to construction or relocation of new facilities associated with water treatment would be less than significant, and no further analysis of this topic in the EIR is required.

Infrastructure

According to LADWP (see correspondence contained in Appendix G-5 of this Initial Study), there are no known water service deficiencies in the Project area. There is an eight-inch water main in Grand Avenue and a 24-inch trunk line on 12th Street. As part of the building permit process, the City would confirm that there is sufficient capacity in the existing water supply infrastructure to accommodate the Project's water needs. If a deficiency or service problem is discovered during the permitting process that prevents the Project from providing an adequate level of service, the Project shall fund the required upgrades to adequately serve the Project. Potential water main or infrastructure upgrades would not be expected to create a significant impact to the physical environment as installation of any upgrades would primarily involve trenching within the affected streets and within areas that have already been significantly disturbed. The Project would secure any necessary permits from the Department of Public Works and would comply with all standard City requirements during construction. Finally, as recommended in LADOT's assessment letter (see Appendix H-2 of this Initial Study), the Project would include a Worksite Traffic Control Plan, which would facilitate the flow of traffic during the potential off-site water infrastructure upgrade activities near the Project Site, if upgrades are required. Therefore, Project impacts related to the construction or relocation of new facilities associated with water infrastructure would be less than significant, and no further analysis of this topic in the EIR is required.

Table XIX-1
Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Studio units	12 du	89 gpd/du	1,068
1-bedroom units	174 du	130 gpd/du	22,620
2-bedroom units	118 du	177 gpd/du	20,886
3-bedroom units	8 du	224 gpd/du	1,792
Commercial [b]	7,100 sf (473 seats)	38 gpd/seat	17,974
Pool	6,000 cubic feet	9.57 gpd/cubic foot	57,420
Spa	750 cubic feet	9.57 gpd/cubic foot	7,178
		Total Project Water Demand	**128,938**

Notes:
sf =square feet; du = dwelling units
[a] Source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, June 17, 2020. Correspondence contained in Appendix G-6 of this Initial Study. Water consumption rates are assumed at 128 percent (nonresidential) and 118 percent (residential) of wastewater generation rates. No existing water demand at the site was assumed.
[b] To provide a conservative estimate of impacts, all commercial space was assumed to be restaurant space. Restaurant uses conservatively assumed to contain 1 seat per 15 square feet.

Wastewater

Treatment

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 mgd to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity.

The Project would generate an increase of approximately 103,940 gallons of wastewater per day (or 0.10 mgd) (refer to Table XIX-2). With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Additionally, the LADWP owns and operates the LAAFP located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

As shown on Table XIX-1, the Project would result in an increase of approximately 128,938 gallons of water per day (or 0.13 mgd). With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to construction or relocation of new facilities associated with wastewater treatment would be less than significant, and no further analysis of this topic in the EIR is required.

Infrastructure

According to LA Sanitation, Wastewater Engineering Services Division (see correspondence contained in Appendix G-6 of this Initial Study), the sewer infrastructure in the vicinity of the Project includes an existing 10-inch line on Grand Avenue. The sewage from the existing 10-inch line feeds into a 24-inch line on Hope Street before discharging into a 66-inch sewer line on Grand Avenue. Further detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, the Project would be required to build sewer lines to a point in the sewer system with sufficient capacity. Potential sewer infrastructure upgrades would not be expected to create a significant impact to the physical environment as installation of any upgrades would primarily involve trenching within the affected streets and within areas that have already been significantly disturbed. The Project would secure any necessary permits from the Department of Public Works and would comply with all standard City requirements during construction. Finally, as recommended in LADOT's assessment letter (see Appendix H-2 of this Initial Study), the Project would include a Worksite Traffic Control Plan, which would facilitate the flow of traffic during the potential off-site sewer infrastructure upgrade activities near the Project Site, if upgrades are required. Therefore, Project impacts related to the construction or relocation of new facilities associated with wastewater infrastructure would be less than significant, and no further analysis of this topic in the EIR is required.

Table XIX-2
Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Studio units	12 du	75 gpd/du	900
1-bedroom units	174 du	110 gpd/du	19,140
2-bedroom units	118 du	150 gpd/du	17,700
3-bedroom units	8 du	190 gpd/du	1,520
Commercial [b]	7,100 sf (473 seats)	30 gpd/seat	14,190
Pool	6,000 cubic feet	7.48 gpd/cubic foot	44,880
Spa	750 cubic feet	7.48 gpd/cubic foot	5,610
Total Project Wastewater Generation			**103,940**

Notes:
sf =square feet; du = dwelling units
[a] Source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation June 17, 2020. Correspondence contained in Appendix G-6 of this Initial Study. No existing wastewater generation at the site was assumed.
[b] To provide a conservative estimate of impacts, all commercial space was assumed to be restaurant space. Restaurant uses conservatively assumed to contain 1 seat per 15 square feet.

Storm Water Drainage

As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant, and no further analysis of this topic in the EIR is required.

Electrical Power

As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impacts related to electric power facilities would be less than significant, and no further analysis of this topic in the EIR is required.

Natural Gas

As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impacts related to natural gas facilities would be less than significant, and no further analysis of this topic in the EIR is required.

Telecommunications

In the Project area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant, and no further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

As shown on Table XIX-1, the Project would consume an increase of approximately 128,938 gallons of water per day (or 0.13 mgd). According to LADWP, if a project is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated. As discussed previously in response to Checklist Question XI(b) (Land Use and Planning), the Project is consistent with the City's General Plan land use designation for the Project Site. According to LADWP (see correspondence in Appendix G-5), the 2015 UWMP was developed based on demographic projections provided in SCAG's RTP/SCS. As discussed in previously in response to Checklist Question III(a) (Air Quality), the Project's estimated population growth would be within the population projections contained in SCAG's 2016-2040 RTP/SCS, upon which the current UWMP was based. Thus, the Project's demand for water could be accommodated by LADWP's existing and projected water supplies. As such, the Project would not require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant, and no further analysis of this topic in the EIR is required.

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?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As discussed in subsection (a), above, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant, and no further analysis of this topic in the EIR is required.

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. The landfills that serve the City and the capacity of these landfills, are shown on Table XIX-3. As shown, the landfills have an approximate available daily intake of 21,798 tons.

Table XIX-3
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	19	65.3	12,100	7,012	5,088
Chiquita Canyon	29	59.8	12,000	2,307	9,693
Antelope Valley	22	12.0	3,600	1,677	1,923
Lancaster	23	10.2	3,000	376	2,624
Calabasas	11	4.9	3,500	1,030	2,470
				Total	**21,798**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019.

Construction

As shown in Table XIX-4, the Project would result in approximately 4,596 tons of construction and demolition waste over the entirety of the construction period, not accounting for any mandatory recycling. Pursuant to the requirements of Senate Bill 1374[81], the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Given the remaining permitted capacity of the landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

81 https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374

Table XIX-4
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Demolition Waste			
Non-residential	44,769 sf	173 pounds / sf	3,873
Construction Waste			
Residential	323,529 sf	4.38 pounds / sf	709
Non-residential	7,100 sf	3.89 pounds / sf	14
		Total	**4,596**

Over the entire schedule of construction.
sf = square feet, 1 ton = 2,000 pounds
Based on 115 pounds of residential demolition per square foot and 173 pounds of nonresidential demolition per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-3 and Table A-4, pages A-2 to A-3: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf).
U.S. EPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998. Applied generation rates are averages of empirical waste assessments of residential demolition, non-residential demolition, residential construction, and non-residential construction waste streams in the United States.
Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Tables A-1 and A-2, page A-1: http://www.epa.gov/osw/hazard/generation/sqg/cd-rpt.pdf).

Operation

As shown on Table XIX-5 it is estimated the Project would generate an increase of approximately 3,852 pounds (1.9 tons) of solid waste per day. This total is a conservative estimate and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement.

Table XIX-5
Project Estimated Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Residential Units	312 du	12.23 lbs/du/day	3,816
Commercial	7,100 sf	5 lbs/day/1,000 sf	36
		Total Project Solid Waste Generation	**3,852**

Notes:
sf =square feet; du = dwelling units
[a] Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. Source: CalRecycle Estimated Solid Waste Generation Rates.

With a remaining daily intake capacity of approximately 21,798 tons of solid waste per day, the landfills serving the City could accommodate the Project's increase of approximately 1.9 tons of solid waste per day. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and

composting. The City is on track toward its goal to achieve a 90 percent diversion by 2025.[82,83] Therefore, Project impacts related to solid waste would be less than significant, and no further analysis of this topic in the EIR is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process. The Project would comply with the applicable regulations associated with solid waste, including AB 939, SB 1374, as well as the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, a less than significant impact would occur, and no further analysis of this topic in the EIR is required.

82 Zero Waste Progress Report, City of Los Angeles, March 2013, http://www.forester.net/pdfs/City_of_LA_Zero_Waste_Progress_Report.pdf, November 2016.

83 City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2012/13-2016/17, http://dpw.lacounty.gov/services/aboutDPW/strategicPlan.pdf, November 2016.

XX. 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 severity 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 wildfire risks, and thereby expose project occupants to, pollutant concentrations from 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 Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[84] Therefore, no impact regarding this topic would occur, and no further analysis of this topic in the EIR is required.

b. Due to 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 Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[85] In addition, the Project Site is flat and is

84 City of Los Angeles, ZIMAS Parcel Profile Report, website: http://zimas.lacity.org, May 1, 2020.
85 Ibid.

not located in a hillside zone. Therefore, no impact regarding this topic would occur, and no further analysis of this topic in the EIR is required.

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?

No Impact. The Project Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[86] Therefore, no impact regarding this topic would occur, and no further analysis of this topic in the EIR is required.

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 Site is not located in or near a state responsibility area, nor is the Project Site located in a Very High Fire Hazard Severity Zone.[87] Therefore, no impact regarding this topic would occur, and no further analysis of this topic in the EIR is required.

XXI. 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?	☒	☐	☐	☐

86 Ibid.
87 Ibid.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project has the potential to result in significant impacts with respect to historic resources. Therefore, the EIR will further analyze whether the Project would have a significant impact on historic resources and whether the Project would eliminate important examples of the major periods of California history.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with the impacts of related projects in proximity to the Project Site such that impacts occur that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other past, current, and/or reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in an EIR. Therefore, the potential for cumulative impacts related to cultural resources and noise resulting from the Project in conjunction with the applicable related projects will be analyzed and documented in the EIR. The potential for significant cumulative impacts from

the other environmental issues that are not to be evaluated and documented in the EIR can be assessed at this time. These cumulative impacts are concluded to be less than significant for those issues for which it has been determined that the Project's incremental contribution would be less than significant. Therefore, only those aspects of the Project to be analyzed and documented in an EIR are concluded to have the potential for significant cumulative impacts.

With regards to cumulative effects with respect to aesthetics, agricultural resources, air quality, biological resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable as the Project would either have no impact or a less than significant impact with respect to these topics, and therefore could not combine with other projects to result in cumulative impacts.

Therefore, cumulative impacts with respect to these areas would be less than significant, and no mitigation measures are required. No further analysis of these topics in the EIR is required. However, as indicated above, the EIR will address cumulative impacts to cultural resources and noise.

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

Potentially Significant Impact. As discussed above, the Project could result in environmental effects with respect to historic resources and noise that could have substantial adverse effects on human beings, either directly or indirectly. As a result, the potential effect to historic resources and noise will be analyzed further in the EIR.