# City of Los Angeles

Department of City Planning

200 N. Spring Street, Room 721
Los Angeles, CA 90012

# INITIAL STUDY/Mitigated Negative Declaration

SOUTH LOS ANGELES COMMUNITY PLAN AREA

# 2250 Pico Boulevard Hotel Project

2250, 2260, 2268, & 2270 Pico Boulevard and 1315 S Arapahoe Street

Case Number: ENV-2018-3545-MND

**Project Location:** The Project is in the City of Los Angeles along the south side of W. Pico Boulevard between Magnolia Avenue and Arapahoe Street and extending south approximately 180 feet from Pico Boulevard.

**Council District:** 1—Cedillo

**Project Description:** The Project would involve the demolition of an existing 9,627 square-foot market and surface parking areas for the construction of a 2-building, 6-story hotel above three levels of subterranean parking. The Project would contain 125 rooms on a 28,345-square- foot property. The Project would include approximately 130 automobile parking spaces. The Floor Area Ratio (FAR) of the proposed buildings would be 2.99:1 and the maximum height would be approximately 76½ feet to the top of the roof parapet.

The Applicant has requested (1) a General Plan Amendment pursuant to Section 11.5.6 of the LMAC to amend the designation of the Project site on the South Los Angeles Community Plan Land Use Map from Commercial Manufacturing and Low Medium II to Neighborhood Commercial; (2) a Vesting Zone Change and Height District Change from [Q]C2-1 and RD1.5-1 to C2-2, pursuant to Section 12.32 of the LAMC; (3) a Conditional Use Permit to allow the construction, use, and maintenance of a hotel within 500 feet of any residence, pursuant to Section 12.24W.24 of the LAMC; and (4) Site Plan Review for a development project in excess of 50,000 square feet of non-residential floor area. In addition, the Project would require approval of permits from the City associated with construction of the project, including demolition and building permits.

| APPLICANT: | PREPARED BY: | ON BEHALF OF: |
|---|---|---|
| Infinitely Group, Inc.<br>611 South Westlake Avenue<br>Los Angeles, CA 90057 | Meridian Consultants LLC<br>920 Hampshire Rd., Ste. A5<br>Westlake Village, CA 91361 | City of Los Angeles<br>Department of City Planning<br>Environmental Analysis Section |

**OCTOBER 2020**

# CITY OF LOS ANGELES

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

### PROPOSED MITIGATED NEGATIVE DECLARATION

| | | |
|---|---|---|
| **LEAD CITY AGENCY:**<br>City of Los Angeles, Department of City Planning | | **COUNCIL DISTRICT:**<br>CD 1 – Gilbert Cedillo |
| **PROJECT TITLE:**<br>2250 Pico Boulevard Hotel Project | **ENVIRONMENTAL CASE:**<br>ENV-2018-3545-MND | **CASE NOS:**<br>CPC-2018-3544-GPA-VZC-HD-CU-SPR |

**PROJECT LOCATION:** South side of W. Pico Boulevard between Magnolia Avenue and Arapahoe Street and extending south approximately 180 feet from Pico Boulevard. Includes the addresses of 2250, 2260, 2268, & 2270 Pico Boulevard and 1315 S Arapahoe Street

**PROJECT DESCRIPTION:**

The Project would involve the demolition of an existing 9,627 square-foot market and surface parking areas for the construction of a 2-building, 6-story hotel above three levels of subterranean parking. The Project would contain 125 rooms on a 28,345-square- foot property. The Project would include approximately 130 automobile parking spaces. The Floor Area Ratio (FAR) of the proposed building would be 2.99:1 and the maximum height would be approximately 76½ feet to the top of the roof parapet.

The Applicant has requested (1) a General Plan Amendment pursuant to Section 11.5.6 of the LMAC to amend the designation of the Project site on the South Los Angeles Community Plan Land Use Map from Commercial Manufacturing and Low Medium II to Neighborhood Commercial; (2) a Vesting Zone Change and Height District Change from [Q]C2-1 and RD1.5-1 to C2-2, pursuant to Section 12.32 of the LAMC; (3) a Conditional Use Permit to allow the construction, use, and maintenance of a hotel within 500 feet of any residence, pursuant to Section 12.24W.24 of the LAMC; and (4) site plan review. In addition the Project would require approval of permits from the City associated with construction of the project, including demolition and building permits.

**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:**

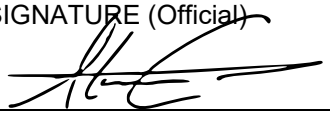
Infinitely Group, Inc.
611 South Westlake Avenue
Los Angeles, CA 90057

**FINDING:** The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comment received during the public review period is attached together with the response of the Lead City Agency. The project decision-maker may adopt the Mitigated Negative Declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

| | | |
|---|---|---|
| NAME OF PERSON PREPARING FORM<br>Alan Como, AICP | TITLE<br>City Planner | TELEPHONE NUMBER<br>(213)847-3633 |
| ADDRESS<br>200 N. Spring Street, Room 721<br>Los Angeles, CA 90012 | SIGNATURE (Official)<br>  | DATE<br>October 15, 2020 |

# SUMMARY OF MITIGATION MEASURES

**Aesthetics:** No mitigation measures are required.

**Agriculture and Forestry Resources:** No mitigation measures are required.

**Air Quality:** No mitigation measures are required.

**Biological Resources:** No mitigation measures are required.

**Cultural Resources:** No mitigation measures are required.

**Geology and Soils:**

**MM-GEO-1: Soil Condition**

Prior to the issuance of grading or building permits, the applicant would be required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss building design consideration that include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. After its review of the geotechnical report, the Department of Building and Safety shall issue a Geology and Soils Report Approval Letter for the proposed Project. The project shall comply with all conditions contained within the letter.

**Greenhouse Gas Emissions:** No mitigation measures are required.

**Hazards and Hazardous Materials:** No mitigation measures are required.

**Hydrology and Water Quality:** No mitigation measures are required.

**Land Use and Planning:** No mitigation measures are required.

**Mineral Resources:** No mitigation measures are required.

**Noise:**

**MM-NOI-1** **Increased Noise Levels (Demolition, Grading and Construction Activities)**

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Temporary noise barriers shall be installed on the property line of the construction site abutting residential uses. The noise barrier shall be engineered to reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10dBA. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all activities on the Project site are complete.
- The Project shall limit the number of noise-generating heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously used on the Project site within 50 feet of off-site noise sensitive receptors adjacent to the south of the Project site to generally no more than two to three pieces of heavy-duty off-road equipment

**Population and Housing:** No mitigation measures are required.

**Public Services:** No mitigation measures are required.

**Recreation:** No mitigation measures are required.

**Transportation:**

**MM-TRANS-1: Work Area Traffic Management Plan**

- The Project Applicant shall submit a formal Work Area Traffic Control Plan for review and approval by the Department of Building and Safety prior to the issuance of any construction permits. This plan shall incorporate safety measures around the site to reduce the risk to pedestrian traffic near the work area. This plan shall identify traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. This plan shall include:

    - Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
    - Temporary pedestrian facilities shall be adjacent to the Project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
    - Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
    - Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
    - The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
    - The applicant shall be limited to no more than two trucks at any given time within the site's staging area.
    - There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
    - No hauling shall be done before 9 a.m. or after 3 p.m.

- Trucks shall be spaced so as to discourage a convoy effect.
- A minimum of two flag persons are required. One flag person is required at the entrance to the Project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the Project site in each direction.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

**MM-TRANS-2 Public Services (Construction Activity Near Schools)**

- The developer and contractors shall maintain ongoing contact with administrator of Magnolia Avenue Elementary School, Berends Middle School, and W Adams High. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging, idling or parking on construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school during school hours.

**MM-TRANS-3 Public Services (Schools affected by Haul Route)**

- Los Angeles Department of Building and Safety (LADBS) shall assign specific haul route hours of operation based upon local school hours of operation.

- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the schools during periods when school is in session especially when students are arriving or departing from the campus.

**Tribal Cultural Resources:** No mitigation measures are required.

**Utilities and Service Systems:** No mitigation measures are required.

**Wildfires:** No mitigation measures are required.

**Mandatory Findings of Significance:** Applicable mitigation measures have been stated above.

# Initial Study
# 2250 Pico Boulevard Hotel Project
2250, 2260, 2268, & 2270 Pico Boulevard
and 1315 S Arapahoe Street
City of Los Angeles

**Prepared for:**

City of Los Angeles
Department of City Planning

**Prepared by:**

Meridian Consultants LLC
920 Hampshire Road, Suite A5
Westlake Village, California 91361

**October 2020**

# TABLE OF CONTENTS

## List of Figures



## List of Tables

# PROJECT DESCRIPTION

## A. Project Summary

The Project is located at 2250, 2260, 2268 and 2270 W Pico Boulevard and 1315 S Arapahoe Street, Los Angeles, California. The Project would involve the demolition of an existing 9,627-square-foot market and surface parking areas for the construction of a two-building, 6-story hotel above three levels of subterranean parking. The Project would contain 125 rooms on a 28,345-square-foot property. The Floor Area Ratio (FAR) of the proposed building would be 2.99:1 and the maximum height would be approximately 76½ feet to the top of the roof parapet.

To implement the Project, the Applicant is requesting the following actions:

- a General Plan Amendment pursuant to Section 11.5.6 of the LMAC to amend the designation of the Project site on the South Los Angeles Community Plan Land Use Map from Commercial Manufacturing and Low Medium II to Neighborhood Commercial;
- a Vesting Zone Change and Height District Change from [Q]C2-1 and RD1.5-1 to C2-2, pursuant to Section 12.32 of the LAMC;
- a Conditional Use Permit to allow the construction, use, and maintenance of a hotel within 500 feet of any residence, pursuant to Section 12.24W.24 of the LAMC; and
- site plan review.

In addition to the discretionary entitlements identified above, approvals may be required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, building and interior improvements.

This Initial Study is a preliminary analysis, prepared by and for the City of Los Angeles as the Lead Agency in compliance with the California Environmental Quality Act (CEQA). A Mitigated Negative Declaration (MND) is prepared when the Initial Study has identified potentially significant effects on the environment but (1) revisions in the project plans or proposals made by, or agreed to by, the Applicant before the proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. The analysis contained in this Initial Study concludes that an MND should be prepared for the Project.

# B. Environmental Setting

### *1. Project Location*

The location of the Project site is shown in **Figure A-1, Project Location Map.** The Project site is west of State Route 110 (SR 110) and north of Interstate 10 (I-10).

The Project site consists of five parcels. Three of the parcels are linked together under Assessor's Parcel Number (APN) 5056-007-023 and are located at the southwest corner of Pico Boulevard and Arapahoe Street, and extend along the south side of Pico Boulevard to the midblock alley. The other two parcels, identified by APN 5056-007-002 and 5056-007-003, are located on the south side of Pico Boulevard on the west side of the midblock alley.

### *2. Existing Conditions*

As shown in **Figure A-2, Aerial View of the Project site**, the 0.7-acre Project site is developed with a 1-story, 9,627-square-foot market between Arapahoe Street and the alley and a related surface parking lot on the west side of the alley.

### *3. Planning and Zoning*

The Project site is located within the South Los Angeles Community Plan Area. A new South Los Angeles Community Plan was adopted by the City in 2017 and as a result new land use designations and zoning became effective in December 2018.[1]

The new Community Plan Land Use Map designates the site as Neighborhood Commercial. In conjunction with the adoption of the new community plan, and consistent with the land use designation, the Project site has been rezoned to C2-1VL-CPIO. The C2 zone permits a variety of commercial uses, such as retail with limited manufacturing; offices; hotels; retail; auto sales, service stations and garages; churches and schools; and residential uses including multifamily apartment houses. The Height District No. 1VL limits the Floor Area Ratio (FAR) to 1.5:1 for commercial uses and to 3:1 for residential uses and the height to 3 stories or 45 feet. The CPIO designation indicates the Project site is within a Community Plan Implementation Overlay District.

However, the application was submitted for a Vesting Zone Change request prior to the adoption of the new community plan. The previous Community Plan Land Use Map designated the site as Commercial Manufacturing and Low Medium Residential. Consistent with the prior Community Plan designation, the Project site is zoned [Q]C2-1 and RD1.5-1. The C2 zone permits a variety

1 As the City accepted the application for this Project prior to the effective date of the new zoning for the site, the zoning discussed in this document is that which was in place at the time of the application.

of commercial uses, such as retail with limited manufacturing; offices; hotels; retail; auto sales, service stations and garages; churches and schools; and residential uses including multifamily apartment houses. The RD zone permits one, two, and three family dwellings, apartment houses, and home occupations with restricted density. The Height District No. 1 limits the Floor Area Ratio (FAR) to 1.5:1 for commercial uses and to 3:1 for residential uses.

**Figure A-3, Existing Zoning and Parcels Map** and **Figure A-4, South Los Angeles Community Plan Map**, depict the land use designations of the Project site and the surrounding properties.

### *4. Surrounding Land Uses*

The Project site is in an urbanized area of Los Angeles. Surrounding uses include a mix of commercial and residential uses and surface parking lots. To the west and east are single-story commercial buildings; to the south are a mixture of single-family and multifamily residences reaching up to 5 stories tall; and to the north is a mixture of residential and commercial uses.

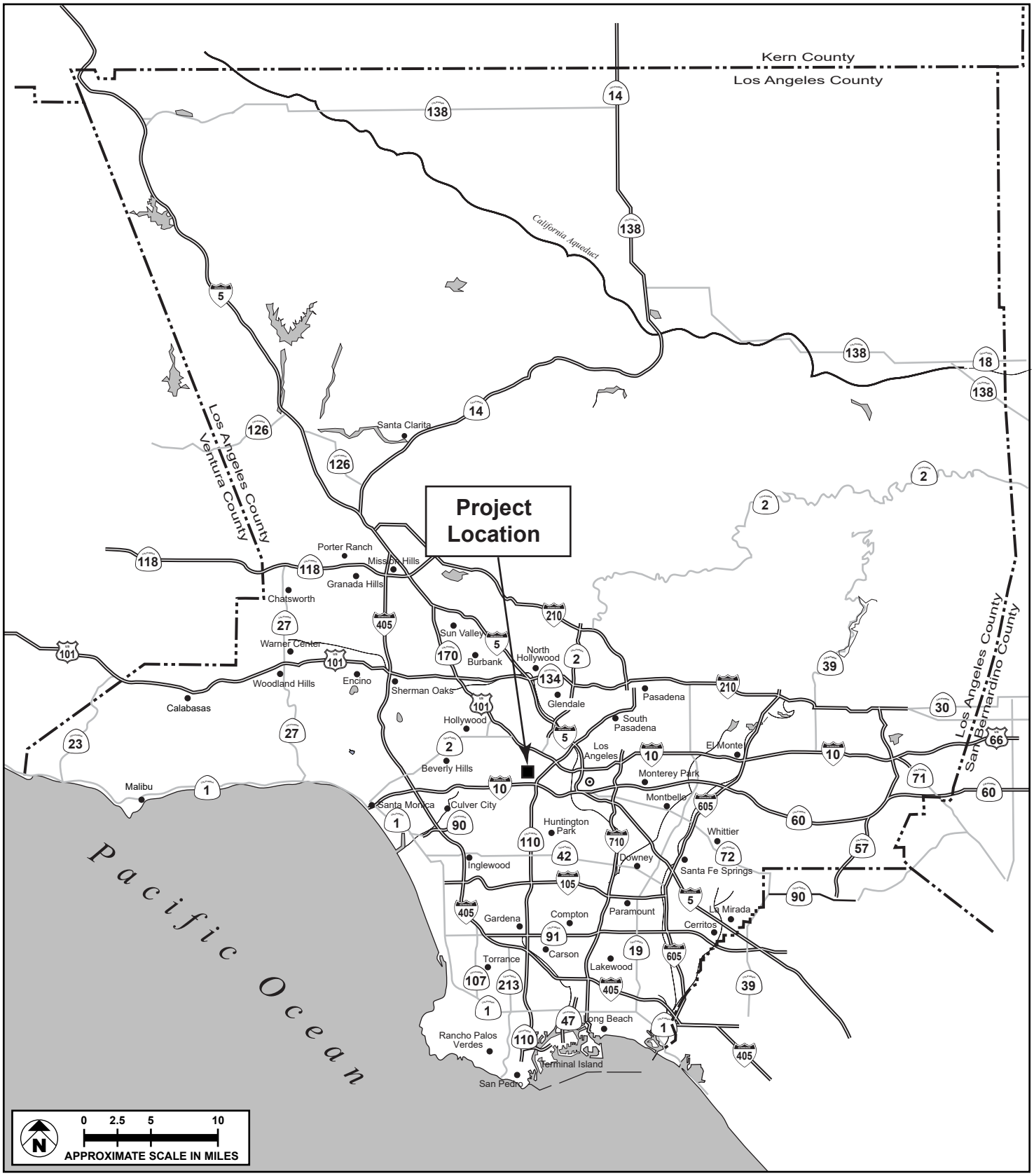



FIGURE **A-1**

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# Project Location Map

173-001-17


**SOURCE:** Google Earth - 2017

FIGURE **A-2**

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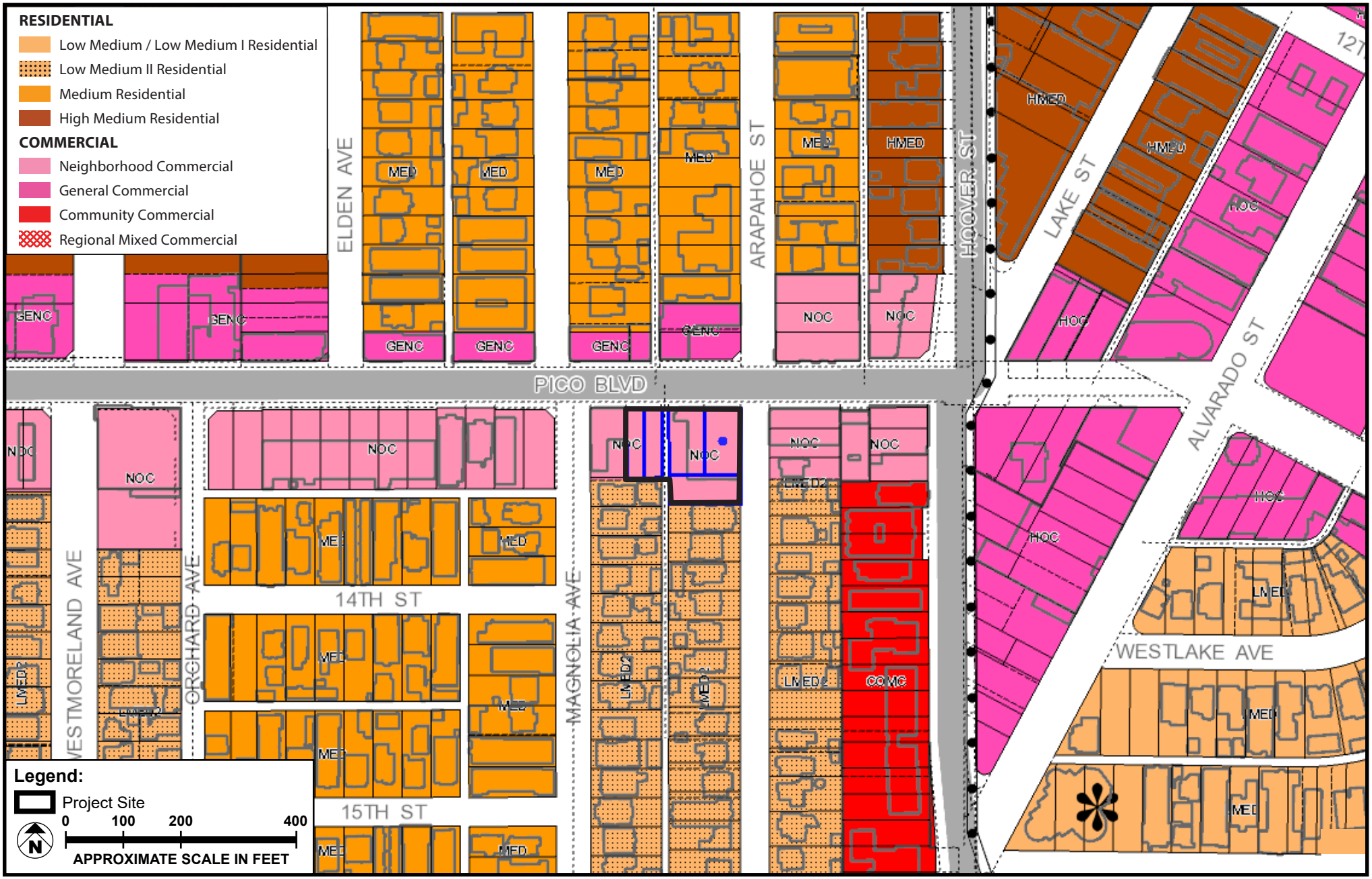
Aerial View of Project Site

173-001-17




**SOURCE:** South Los Angeles Community Plan - 2020

FIGURE **A-3**

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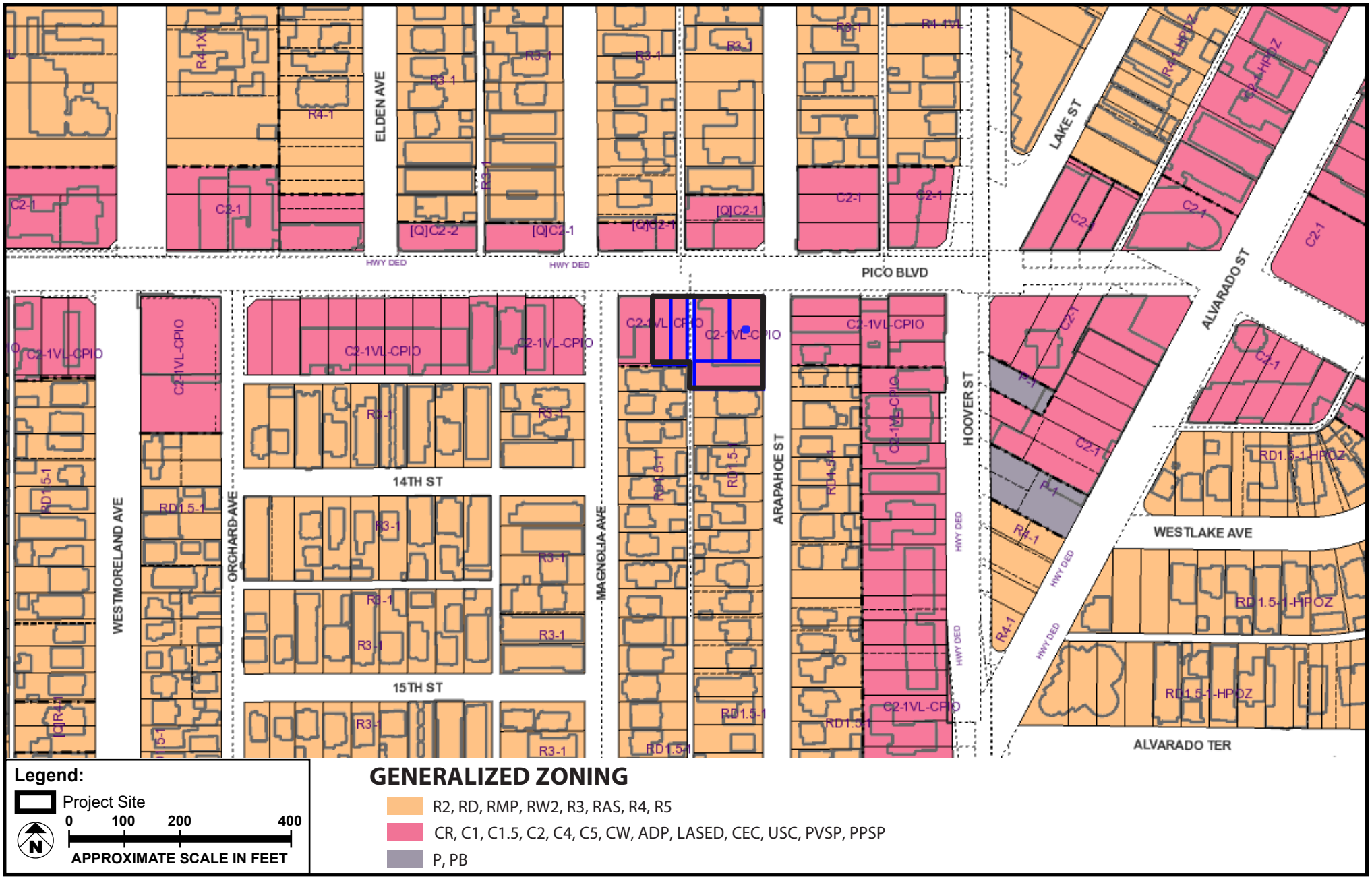
# South Los Angeles Community Plan Map

173-001-17




**SOURCE:** ZIMAS, Streets Copyright © Thomas Brothers Maps, Inc, Accessed March 2020

FIGURE **A-4**

Meridian Consultants

# Zoning Map

173-001-17

## C. Project Design

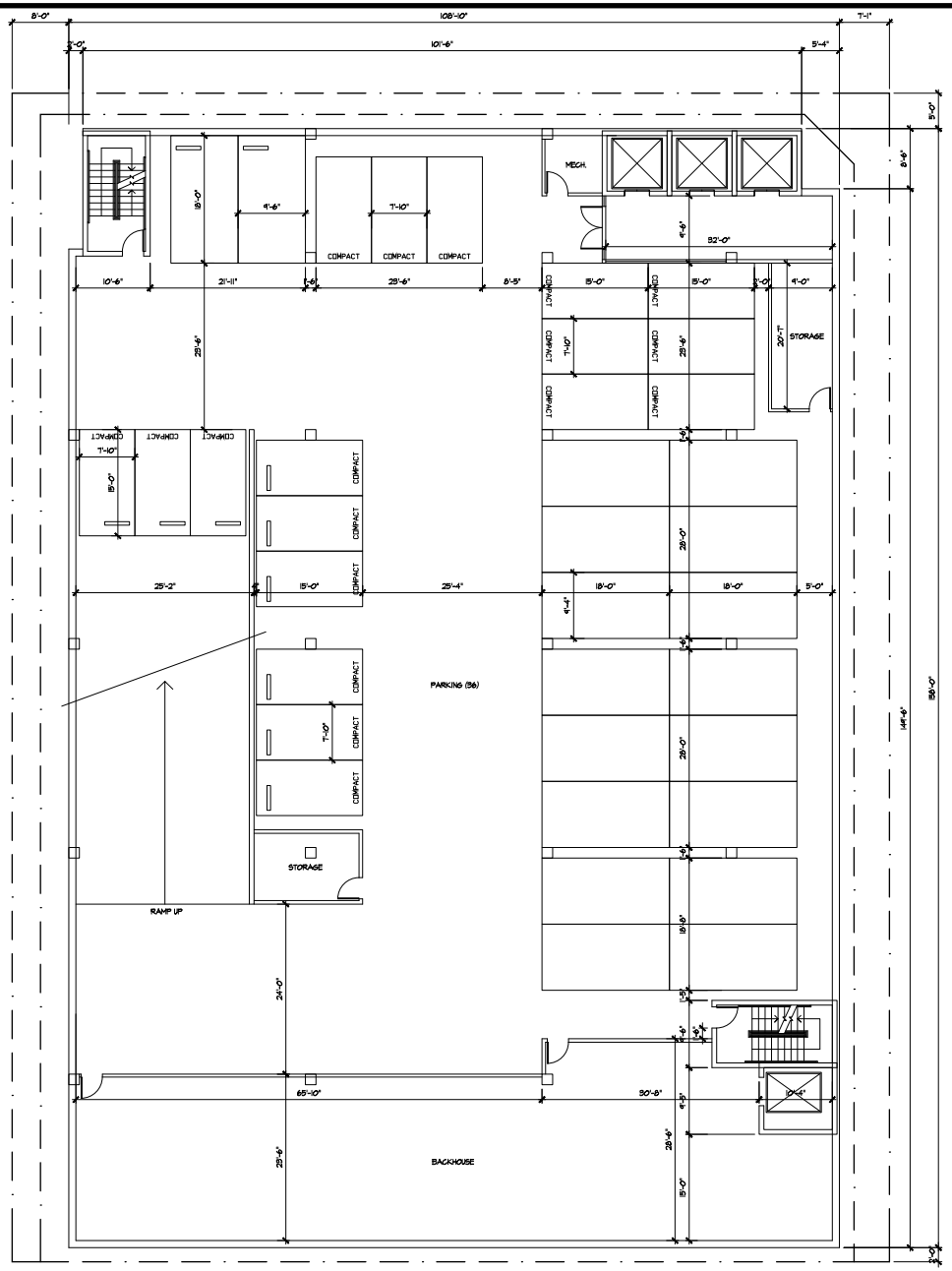
The Project Applicant has proposed to demolish the structure and surface parking on the Project site and construct a two-building, 6-story hotel with 125 rooms total above 3 levels of subterranean parking. The Floor Area Ratio (FAR) of the proposed buildings would be 2.99:1 and the maximum height would be approximately 76½ feet to the top of the roof parapet.

The Project would be required to provide at least 67 parking spaces, and 130 parking spaces would be provided. **Figure A-5, Level B3 Floor Plan,** and **Figure A-6, Levels B1/B2 Floor Plan,** depict the three levels of subterranean parking. These subterranean levels would contain the hotel guest parking.

As shown in **Figure A-7, First-Floor Plan,** the ground floor of both buildings would include the hotel lobby and other hotel areas, a breakfast space, and entrance to the subterranean parking levels. Additional office and storage space would be provided on the Mezzanine level, shown in **Figure A-8**, **Mezzanine Floor Plan**. As shown in **Figure A-9**, **Second-Floor Plan,** this floor has access to the hotel courtyard and pool as well as guest rooms. **Figure A-10, Third through Sixth-Floor Plan** shows the remaining hotel guest rooms**. Figure A-11** shows the roof plan**.**

**Figure A-12, 3-D Rendering** shows a conceptual computer-generated view. **Figure A-13, East and North Elevations**, and **Figure A-14, West and South Elevations** show the elevations of the two buildings from each respective direction. The façade of the Project would be articulated with geometric forms and variations in color. The center of the W Pico Boulevard front would feature an entry plaza. The Project site's architectural materials would include a mix of glass, metal and wood panels.

In order to implement the Project, the Applicant is requesting that the City approve a height district change from Height District 1 to Height District 2, which would permit the requested FAR. In addition, the Applicant is also requesting a Conditional Use Permit, pursuant to LAMC Section 12.24T and 12.24W.24, to allow the construction, use, and maintenance of a hotel within 500 feet of a residence.




0 12.5 25 50

APPROXIMATE SCALE IN FEET

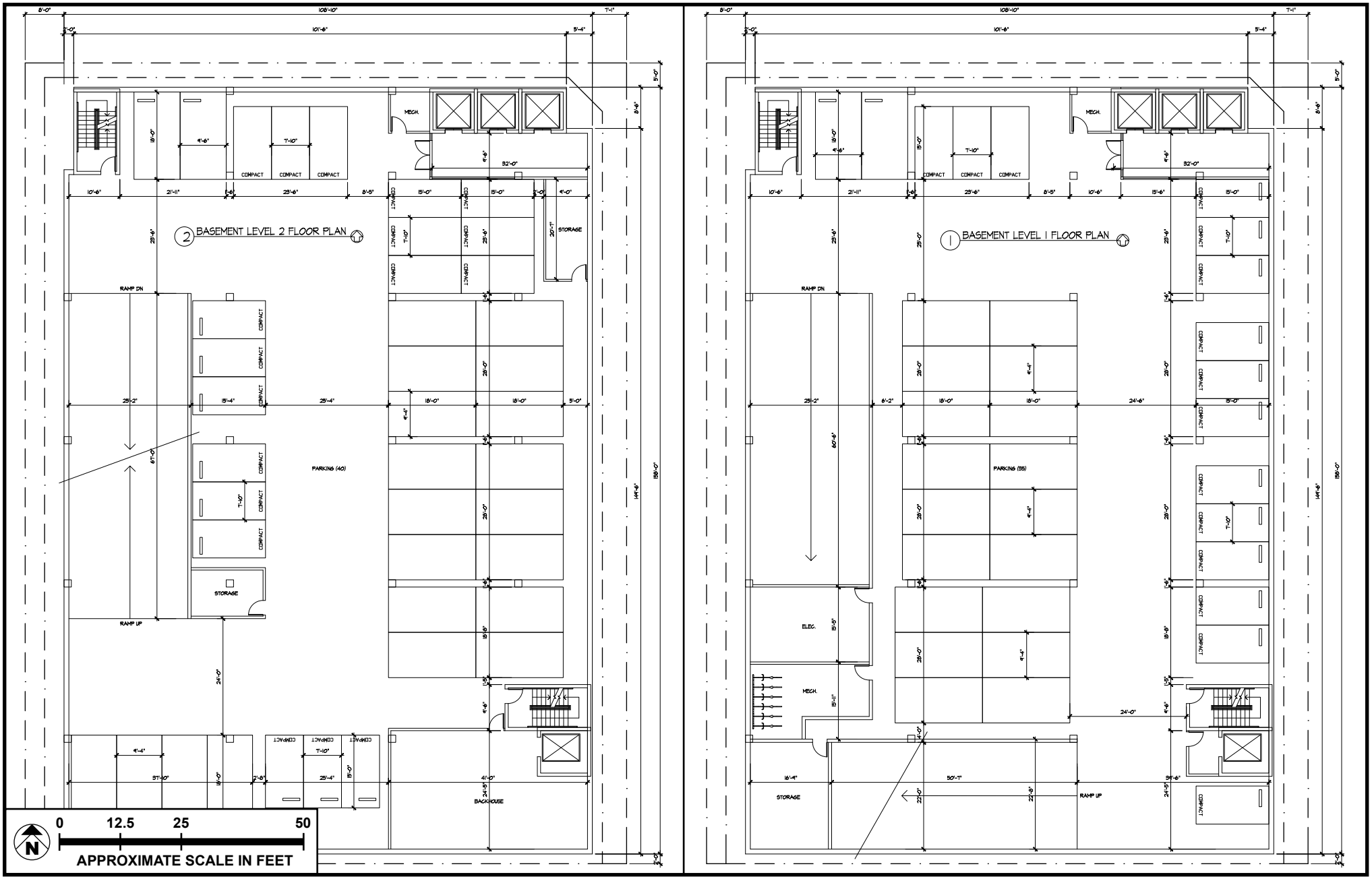
**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-5**

Meridian Consultants

# Level B3 Floor Plan

173-001-17



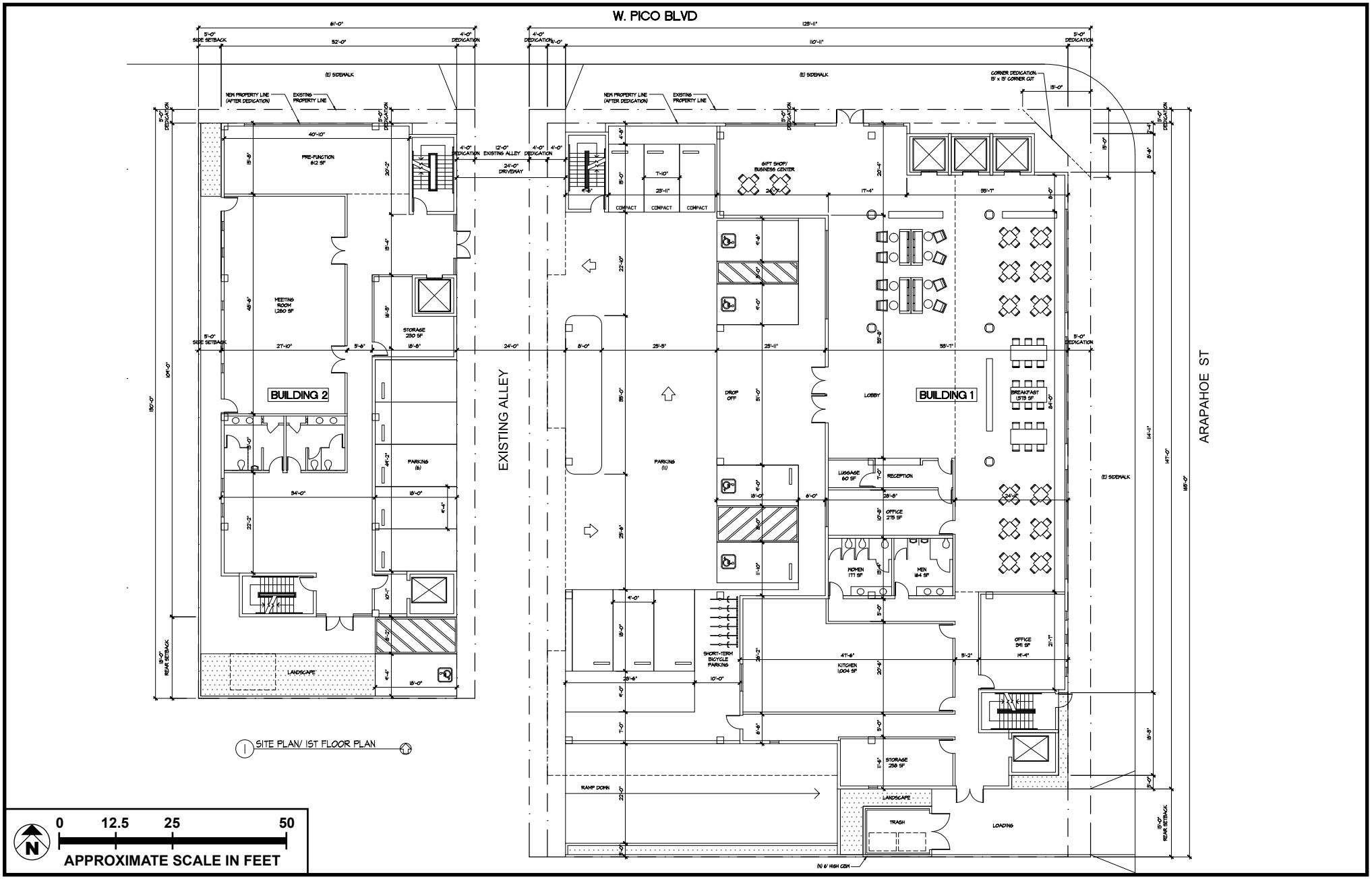

**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-6**

Meridian Consultants

# Level B1/B2 Floor Plan

173-001-17




**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-7**

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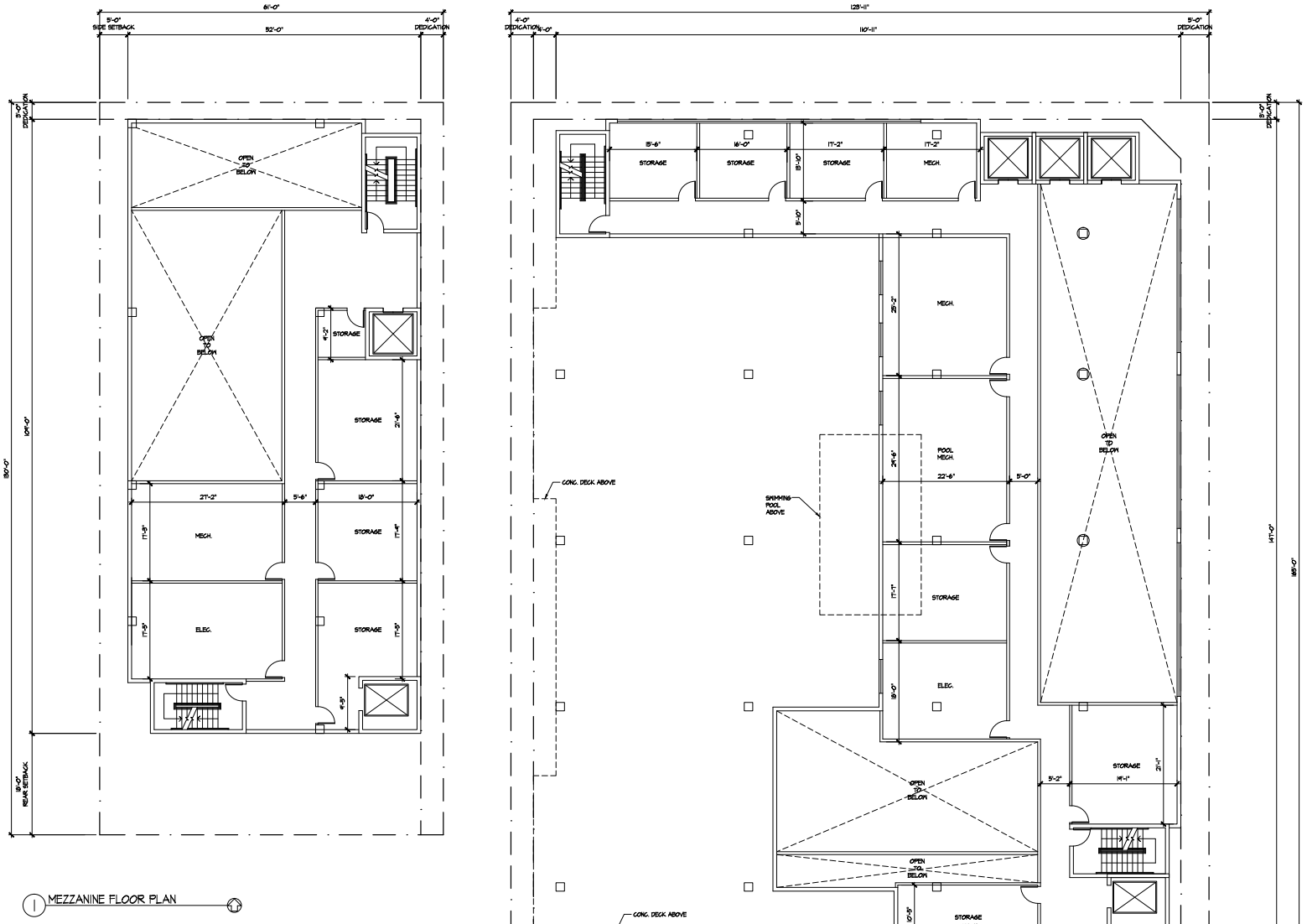
First-Floor Plan

173-001-17



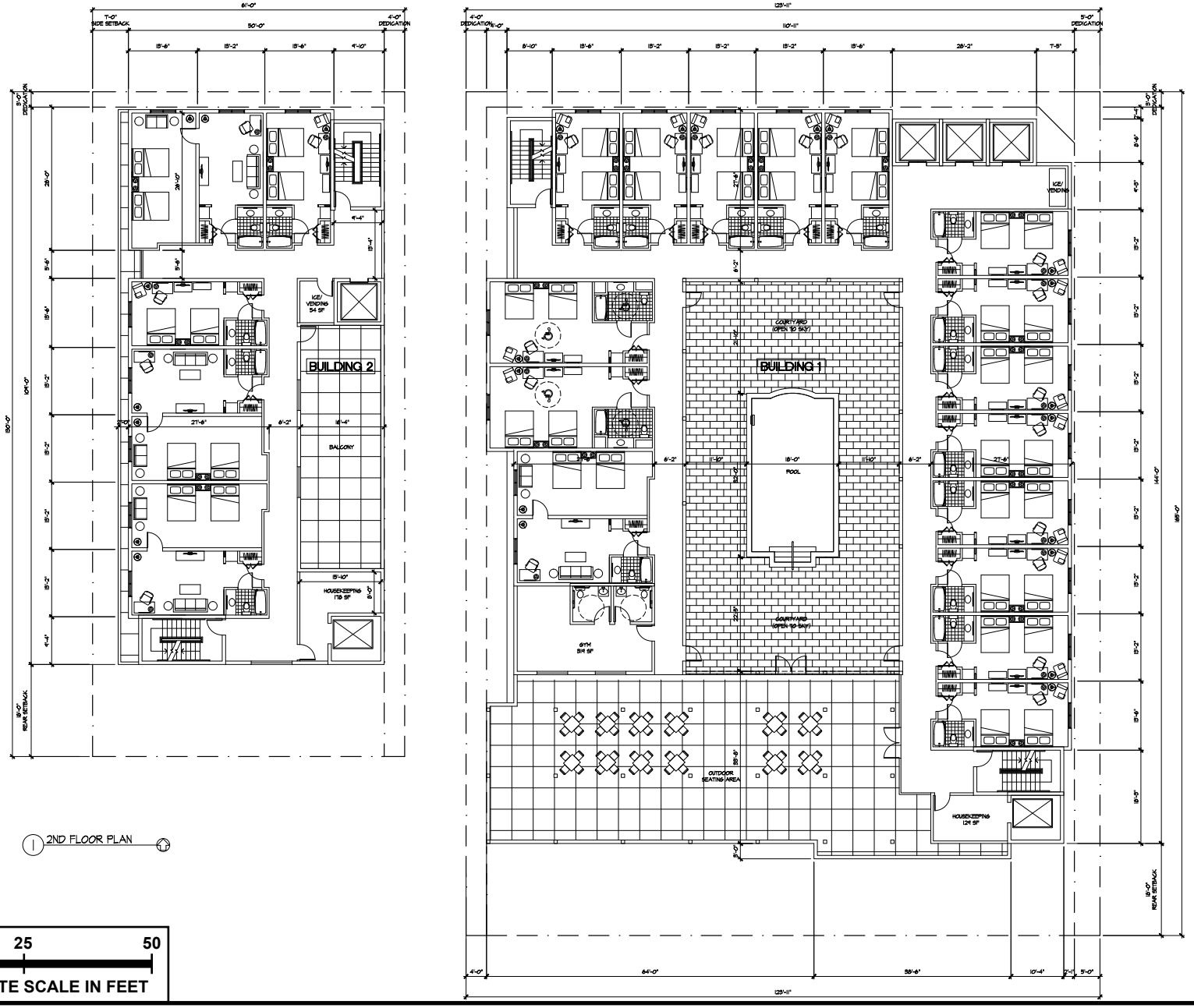

**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-8**

Meridian Consultants

# Mezzanine Floor Plan

173-001-17




**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-9**

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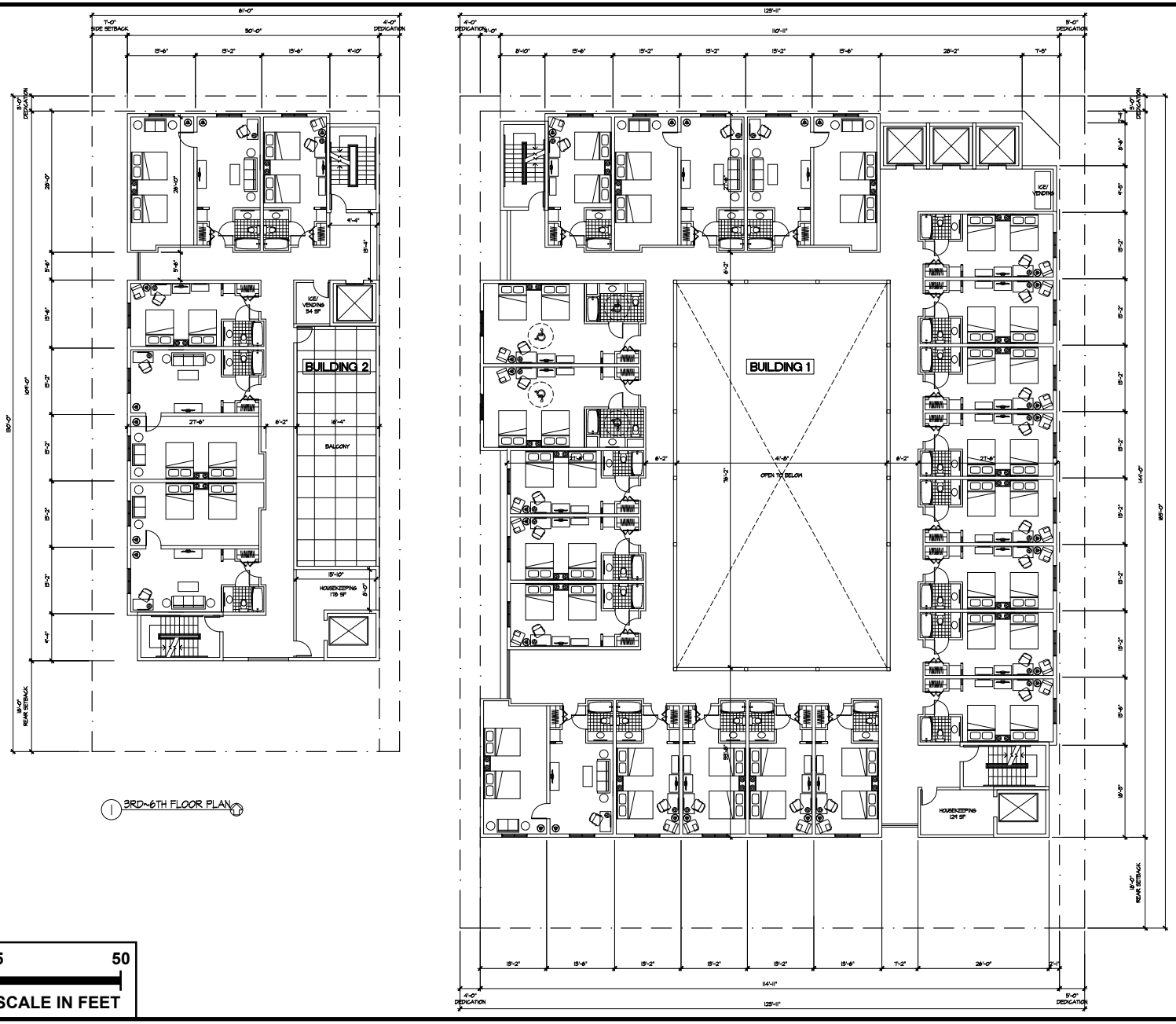
# Second-Floor Plan

173-001-17



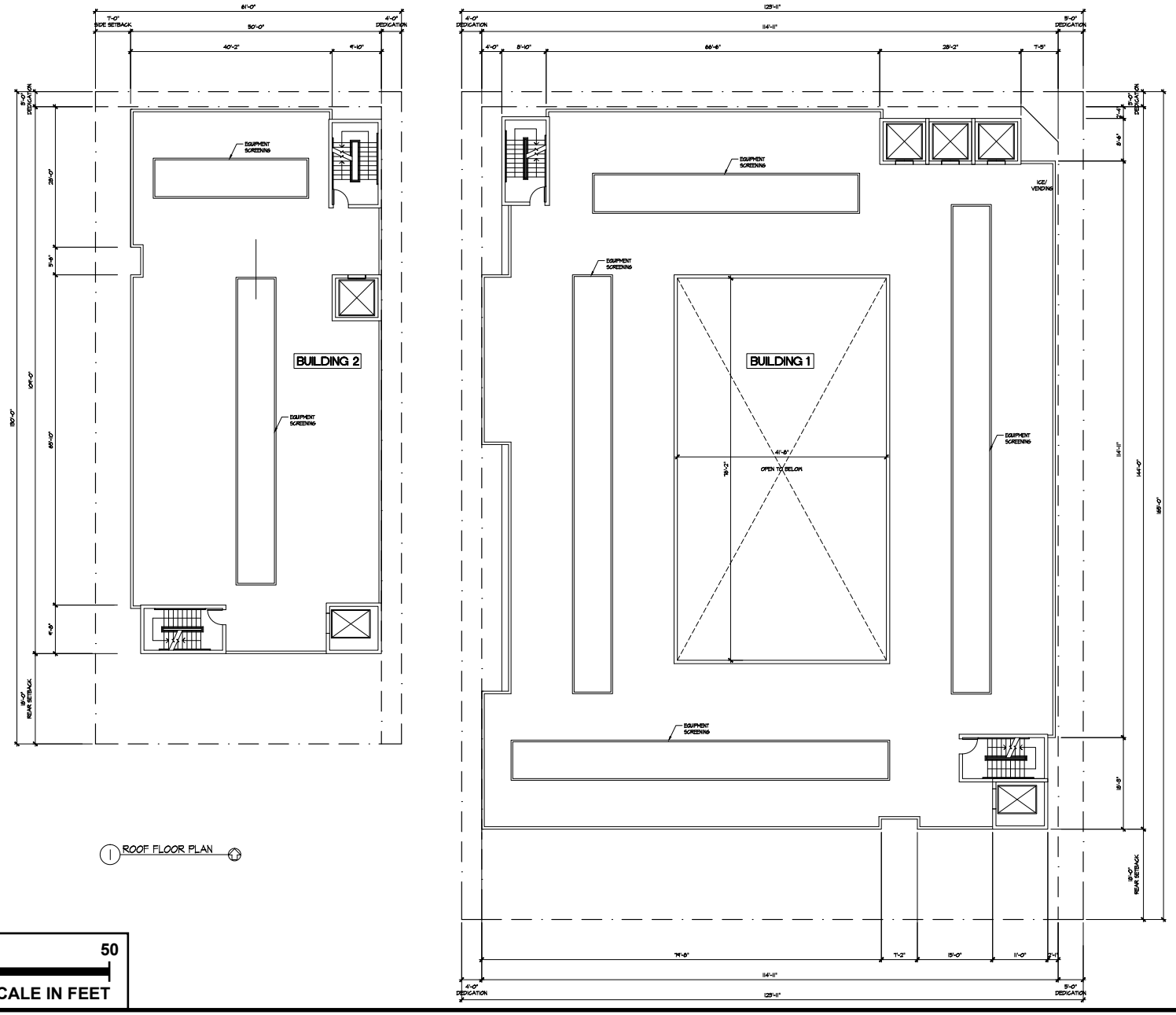

**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-10**

Meridian Consultants

# Third through Sixth-Floor Plans

173-001-17




**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-11**

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# Roof Plan

173-001-17


**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-12**

Meridian Consultants

3D Rendering

173-001-17


EAST ELEVATION (ARAPAHOE ST.)


NORTH ELEVATION (PICO BLVD.)

1. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6197 MODERN IVORY

2. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6192 NOMADIC TAUPE

3. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6225 FOSSIL

4. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6225 FOSSIL

5. ALUMINUM WINDOW
ARCADIA - COLOR:
DARK BRONZE AB-6 OR E.Q.

6. METAL CANOPY-
COLOR MATCH DUNN EDWARDS
DET 441 REVIVAL RED

7. 
STOREFRONT WINDOW - ARCADIA
COLOR: BLACK
GLAZING COLOR: LIGHT GREEN

8. 
ELDORADO STONE
FOGGY MEADOW-LONGITUDE 24

9. 
ELDORADO STONE
SILENT GREY-LONGITUDE 24

10. 
EXTERIOR WOOD VENEER
RESYSTA
COLOR: FVG C15 DARK SIAM OR E.Q.

**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-13**

Meridian Consultants

# East and North Elevations

173-001-17



1. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6197 MODERN IVORY

2. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6192 NOMADIC TAUPE

3. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6225 FOSSIL

4. EXTERIOR CEMENT PLASTER (STUCCO)
COLOR - DUNN EDWARDS
DE 6225 FOSSIL

5. ALUMINUM WINDOW
ARCADIA - COLOR:
DARK BRONZE AB-6 OR E.Q.

6. METAL CANOPY-
COLOR MATCH DUNN EDWARDS
DET 441 REVIVAL RED

7. 
STOREFRONT WINDOW - ARCADIA
COLOR: BLACK
GLAZING COLOR: LIGHT GREEN

8. 
ELDORADO STONE
FOGGY MEADOW-LONGITUDE 24

9. 
ELDORADO STONE
SILENT GREY-LONGITUDE 24

10. EXTERIOR WOOD VENEER
RESYSTA
COLOR: FVG C15 DARK SIAM OR E.Q.

**SOURCE:** JWDA-MS Architects - May 2018

FIGURE **A-14**

Meridian Consultants

West and South Elevations

173-001-17

## D. Parking and Access

The Project would include approximately 130 automobile parking spaces with three levels of subterranean parking. Access to the subterranean parking and the entrance drop-off area would be from the existing alley.

Local street access is provided by a grid roadway system encompassing the Project site and surrounding area. Pico Boulevard, which borders the Project site to the north, runs in an east–west direction along the Project site. Pico Boulevard generally provides two travel lanes in each direction and is designated by the Mobility Plan as an Avenue II. Arapaho Street, located east of the Project site, is designated by the Mobility Plan as a Local Street and runs in a north–south direction, with one travel lane in each direction. Magnolia Avenue, which borders the Project site to the west, runs in a north–south direction and provides one travel lane in each direction. It is designated by the Mobility Plan as a Collector Street.

Primary regional access to the Project site is provided by State Route 110 (SR 110) and Interstate 10 (I-10). SR 110 runs in a north-south direction, which is east of the Project site. The I-10 runs in an east-west direction, which is south of the Project site, respectively. Additional regional access to the Project site is provided by the US Route 101/Hollywood Freeway (US 101), which generally runs in an east–west direction to the north of the Project site.

The Project site is well served by regional and local public transit. Specifically, the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT) provide access to and from the Project area. Metro Bus Lines 30/330 runs along Pico Boulevard with a stop located at the intersection of Magnolia Avenue and W Pico Boulevard.[2] Other nearby Metro options include routes 28, 200, 204, 603 and Rapid 728, 733, and 754.

2 Metro, “Maps & Timetables,” accessed June 2017, http://www.metro.net/riding/maps/.

## E. Construction

The construction of the Project, including demolition, would take approximately 12 months from start to finish. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition/site clearing, (2) site preparation, and (3) building construction.

Construction of the Project would commence with demolition and site-clearing activities. All existing improvements on the Project site would be removed. Construction and demolition debris would be recycled to the maximum extent feasible. There would be approximately 1,316 tons of demolition debris (asphalt and general construction debris).

After the completion of site clearing, excavation for three subterranean levels of parking would begin. Approximately 24,900 cubic yards of soil would be removed from the Project site and taken to an approved landfill. The Project would require a haul route permit that would specify the truck route to and from the Project site. The anticipated haul route would direct trucks to reach the Project site via the Pico Boulevard to the east on SR-110 and Hoover Street to the south for I-10.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities as needed. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on site for the duration of construction activities. Traffic lane and right-of-way closures, if required, will be properly permitted by the City and will conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities. As stated in Section 41.40 of the LAMC, the permissible hours of construction involving noise-generating equipment within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

# ENVIRONMENTAL CHECKLIST

The following contains an assessment of impacts associated with the topics identified in the Initial Study Checklist contained in Appendix G of the State CEQA Guidelines.

## I. AESTHETICS

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

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA Section 21009 to state that aesthetic impacts of employment center projects located in defined transit priority areas as less than significant under CEQA. Zoning Information File (ZI) No. 2451 issued by the Planning Department includes a corresponding map of Transit Priority Areas (TPAs), which identifies the Project site as within a TPA. An employment center project is defined as a project located on property zoned for commercial uses with a FAR of no less than 0.75. The Project meets these criteria; therefore, any aesthetic impacts, including but not limited to (a) adverse effects on scenic vistas, (b) damage to scenic resources, (c) degradation of existing visual character, (d) light and/or glare, and (e) shade shadow are deemed less than significant as a matter of law. Notwithstanding, the following aesthetic analysis of the project is provided for informational purposes only.

### *a. Have a substantial adverse effect on a scenic vista?*

**Less than Significant Impact.** A significant impact could occur for non–SB 743 projects if the Project introduced incompatible visual elements within a field of view containing a scenic vista or substantially blocked views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project site is located within the Pico Union neighborhood in the South Los Angeles Community Plan area of the City of Los Angeles. The Project site is not located within or along a designated scenic corridor or roadway. The Project site is within the field of view of surrounding mountain ranges. However, the existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur for non–SB 743 projects if existing structures on the Project site have been identified as a scenic resource. The Project site is not bordered by or within the viewshed of a designated scenic highway.[3] No historic buildings, rock outcroppings, or unique geologic features exist on the Project site. As such and given that the Project is within a Transit Priority, impacts would be less than significant.

### *c. Substantially degrade the existing visual character or quality of the site and its surroundings?*

**Less than Significant Impact.** A significant impact could occur for non–SB 743 projects if the Project were to introduce incompatible visual elements on the Project site or visual elements that would be incompatible with the character of the area surrounding the Project site.

#### *Building Heights and Massing*

With respect to building mass and height, land uses within the Project vicinity vary in use and height. Within the South Los Angeles area are commercial retail, office, restaurant, parking, residential, and mixed-use land uses ranging in various heights. Though the proposed buildings would be taller than buildings immediately adjacent, it would be consistent with the overall visual

3 Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

character of the surrounding uses. As such and given that the Project is within a Transit Priority, impacts would be less than significant.

### Views

At a height of approximately 82 feet above grade, the Project may be visible from private viewpoints within commercial or residential buildings in the Pico Union neighborhood. Existing views toward the Los Angeles skyline or the Hollywood Hills from these vantage points may be obstructed as a result of the Project. However, it should be noted that private views are not protected by any viewshed protection ordinance, and the alteration of private views would not constitute a significant impact. The visual impact of one building blocking another building is not considered a significant impact because the general characteristics of the urban setting would not be altered. The Project would be consistent with the general visual character of the Pico Union neighborhood when viewed from a distance. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

### Streetscape

The public façade of the Project would be articulated with geometric forms and variations in color and material. These design elements are intended to create visual interest. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

### Shade and Shadow

A shading impact would normally be considered significant if the proposed Project's structure cast shadows on shade sensitive uses for more than 3 hours each day between the hours of 9:00 AM and 3:00 PM during winter months, or for more than 4 hours each day between the hours of 9:00 AM and 5:00 PM during the summer months. Shade sensitive uses include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors.

At 82 feet high, the Project could cast shadows as long as 250 feet. The Project would cast shadows to the northeast, north and northwest. There are no outdoor spaces or shade sensitive uses that would be affected that are not already subjected to shadow from existing structures. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

### *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 could occur for non–SB 743 projects if the Project introduces new sources of light or glare on or from the Project site that would be incompatible with the areas surrounding the Project site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Project results in a significant nighttime illumination impact shall be made considering the change in ambient illumination levels as a result of Project sources and the extent to which Project lighting would spill off the Project site and affect adjacent light-sensitive areas.

#### Light

Night lighting for the Project site would be provided to illuminate the building entrances and common open space areas, and largely to provide adequate night visibility for guests and to provide a measure of security. The Project site would utilize outdoor lighting designed and installed to meet City Code requirements for shielding. In general, lighting would be typical of hotel structures found in the surrounding area. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

#### Glare

Potential reflective surfaces in the Project site vicinity include automobiles, exterior building windows, and other glass and polished metal surfaces. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Project site's architectural materials would include a mix of glass, metal and wood panels. While distinct in style, the Project would utilize materials and finishes typical of modern hotel structures within the surrounding area. As such and given that the Project is within a Transit Priority Area, impacts would be less than significant.

# II. AGRICULTURE AND FORESTRY RESOURCES

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

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

**No Impact.** The Project site is located within a developed and heavily urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or near the Project site. According to the California Department of Conservation "Los Angeles County Important Farmland 2012" map, the Project site is designated as "urban and built-up land."[4] No portion of the Project site is

4 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2012, map (January 2015), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf.

designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. No impacts would occur.

### *b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

**No Impact.** The Project site is located within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the LAMC. The Project site has land use designations of Commercial Manufacturing and Low Medium II Residential and are zoned for commercial [Q]C2-1 and residential uses RD1.5-1. As such, the Project site is not zoned for agricultural production, and there is no farmland at the Project site. In addition, no Williamson Act Contracts are in effect for the Project site.[5] No impacts would occur.

### *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.** The Project site has land use designations of Commercial Manufacturing and Low Medium II Residential is zoned for commercial uses [C2-1] and residential uses [RD1.5-1]. As such, the Project site is not zoned as forest land or timberland, and there is no timberland production at the Project site. No impacts would occur.

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

**No Impact.** The Project site is currently developed with a single-story market and related surface parking. No forested lands or natural vegetation exists on or near the Project site. No impacts would occur.

### *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.** Neither the Project site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project site is not classified in any "Farmland" category designated by the State of California. No impacts would occur.

5 California Department of Conservation, Division of Land Resource Protection, "The Land Conservation (Williamson) Act" (2013), http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx.

# III. AIR QUALITY

The following section summarizes and incorporates information from the *2268 W Pico Blvd Hotel Project, Air Quality Technical Report,* dated February 17, 2017 (Air Quality Report), prepared by ESA Associates for the Applicant as contained in **Appendix A** of this Initial Study.

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

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

**Less than Significant Impact.** A significant air quality impact could occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The South Coast Air Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (Basin). To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies to develop rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management chapter of the Regional Comprehensive Plan (RCP) are considered consistent with the AQMP growth projections because the Growth Management chapter forms

the basis of the land use and transportation control portions of the AQMP. The Project would replace existing retail and parking uses with a hotel. The Project would not generate substantial new residential population and the level of employment associated with the hotel would not be substantially greater that the existing uses. As such, the Project would not result in a substantial change in population or employment growth within the City of Los Angeles. As such, the Project would not conflict or obstruct the implementation of the AQMP.

In addition, the SCAQMD has developed specific CEQA air quality significance thresholds to assess potential impacts that may result from construction and operation of projects.[6] The Project site is located within the area where these thresholds apply. Daily emissions of volatile organic compounds (VOC), nitrogen oxides (NOX), carbon monoxide (CO), sulfur oxides (SOX), respirable particulate matter less than 10 microns in diameter (PM10) and fine particulate matter less than 2.5 microns in diameter (PM2.5) should be quantified and assessed on both regional and localized scales, in accordance with SCAQMD methodology.

The Project would contribute to regional and localized air pollutant emissions during construction and Project operation. These construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during demolition/site clearing and site preparation/excavation would primarily generate particulate matter less than 10 microns (PM10) and particulate matter less than 3.0 microns (PM2.5) emissions. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings would primarily result in the release of reactive organic gas (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The applicable air quality standards and the calculated emissions associated with the Project are discussed in the Air Quality Report included as **Appendix A** of this Initial Study. The Technical Report overestimates the project with having more rooms, bigger lot acreage, and having no mitigation or regulatory compliance measures included into the model except for SCAQMD Rule 403 Fugitive dust implemented. **Table B.III-1, Maximum Unmitigated Construction Emissions**, identifies daily emissions that are estimated for peak construction days for each construction phase on- and off-site.

6 SCAQMD, CEQA Air Quality Handbook.

**Table B.III-1**
**Maximum Unmitigated Construction Emissions (pounds/day)**

| Source | VOC | NOx | CO | Socks | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Demolition | 3 | 34 | 18 | <1 | 4 | 2 |
| Site Preparation | 2 | 18 | 9 | <1 | 3 | 2 |
| Grading/Excavation | 3 | 55 | 20 | <1 | 5 | 3 |
| Building Construction, Architectural Coating, and Paving | 30 | 32 | 28 | <1 | 3 | 2 |
| SCAQMD Daily Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix A**.*
*Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.*
*Source: ESA, 2268 W Pico Blvd Hotel Project Air Quality Technical Report (2017), Appendix B.*

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Project. Area-source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project site. The analysis of daily operational emissions associated with the Project has been prepared utilizing Cameoed, as recommended by the SCAQMD. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions. The results of these calculations are presented in **Table B.III-2, Maximum Unmitigated Operational Emissions**. Note that the results reflect the net difference between the existing operational emissions generated by uses that would be removed from the Project site and the Project's operational emissions. As shown in **Table B.III-2**, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. As such, impacts would be less than significant. Based on the above, impacts from the Project would be less than significant.

**Table B.III-2**
**Maximum Unmitigated Operational Emissions (pounds/day)**

| Source | VOC | NOx | CO | sox | PM10 | PM 2.5 |
|---|---|---|---|---|---|---|
| Area | 2 | <1 | <1 | <1 | <0.1 | <0.1 |
| Energy | <1 | 1 | <1 | <1 | <0.1 | <0.1 |
| Mobile | 2 | 9 | 23 | <1 | 5.5 | 1.5 |
| *Total* | *4* | *10* | *23* | *<1* | *5.5* | *1.5* |
| *Existing* | *2* | *9* | *22* | *<1* | *4.6* | *1.3* |
| ***Net Total*** | ***2*** | ***1*** | ***1*** | ***<1*** | ***0.9*** | ***0.2*** |
| SCAQMD Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Source: Calero.*

### *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.** A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. Given that the Basin is currently in State nonattainment[7] for ozone, PM10, and PM2.5, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."[8]

The Project would contribute to regional and localized air pollutant emissions during construction and Project operation. These construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during demolition/site clearing and site preparation/excavation would primarily generate particulate matter less than 10

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

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

microns (PM10) and particulate matter less than 3.0 microns (PM2.5) emissions. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings would primarily result in the release of reactive organic gas (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The applicable air quality standards and the calculated emissions associated with the Project are discussed in the Air Quality Report included as **Appendix A** of this Initial Study. The Technical Report overestimates the project with having more rooms, bigger lot acreage, and having no mitigation or regulatory compliance measures included into the model except for SCAQMD Rule 403 Fugitive dust implemented. **Table B.III-3, Maximum Unmitigated Construction Emissions**, identifies daily emissions that are estimated for peak construction days for each construction phase on- and off-site.

**Table B.III-3**
**Maximum Unmitigated Construction Emissions (pounds/day)**

| Source | VOC | NOx | CO | SOx | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Demolition | 3 | 34 | 18 | <1 | 4 | 2 |
| Site Preparation | 2 | 18 | 9 | <1 | 3 | 2 |
| Grading/Excavation | 3 | 55 | 20 | <1 | 5 | 3 |
| Building Construction, Architectural Coating, and Paving | 30 | 32 | 28 | <1 | 3 | 2 |
| SCAQMD Daily Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix A**.*
*Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.*
*Source: ESA, 2268 W Pico Blvd Hotel Project Air Quality Technical Report (2017), Appendix B.*

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Project. Area-source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project site. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod, as recommended by the SCAQMD. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions. The results of these calculations are presented in **Table B.III-4, Maximum**

**Unmitigated Operational Emissions**. Note that the results reflect the net difference between the existing operational emissions generated by uses that would be removed from the Project site and the Project's operational emissions. As shown in **Table B.III-4**, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. As such, impacts would be less than significant. Based on the above, impacts from the Project would be less than significant.

**Table B.III-4**
**Maximum Unmitigated Operational Emissions (pounds/day)**

| Source | VOC | NOx | CO | SOx | PM10 | PM 2.5 |
|---|---|---|---|---|---|---|
| Area | 2 | <1 | <1 | <1 | <0.1 | <0.1 |
| Energy | <1 | 1 | <1 | <1 | <0.1 | <0.1 |
| Mobile | 2 | 9 | 23 | <1 | 5.5 | 1.5 |
| *Total* | *4* | *10* | *23* | *<1* | *5.5* | *1.5* |
| *Existing* | *2* | *9* | *22* | *<1* | *4.6* | *1.3* |
| ***Net Total*** | ***2*** | ***1*** | ***1*** | ***<1*** | ***0.9*** | ***0.2*** |
| SCAQMD Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Source: CalEEMod.*

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

### *c. Expose sensitive receptors to substantial pollutant concentrations?*

**Less than Significant Impact**. Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project are the single- and multifamily residential units on the southern and southeastern boundaries of the Project site.

The SCAQMD has developed localized significance thresholds (LSTs) based on the pounds of emissions per day that would cause or contribute to adverse localized air quality impacts.[9] These

9 SCQAMD, *Final Localized Significance Threshold Methodology* (June 2003; rev. July 2008).

localized thresholds apply to projects that are less than or equal to 5 acres in size and are only applicable to the following criteria pollutants: NOx, CO, PM10, and PM2.5. 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 standards and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA). For PM10, the LSTs were derived based on requirements in SCAQMD Rule 403—Fugitive Dust. For PM2.5, LSTs were derived based on a general ratio of PM2.5 to PM10 for both fugitive dust and combustion emissions. As shown in **Table B.III-5, Maximum Localized Significance Threshold (LST) Emissions,** the Project emissions would not exceed the Localized Significance Thresholds set by the SCAQMD.

Diesel powered vehicles have been recognized as a source of toxic air contaminants (TAC). TAC impacts are assessed through a health risk assessment (HRA) for projects that use, store, or process carcinogenic or non-carcinogenic toxic air contaminants in sufficient quantities and duration to pose a risk to human health. SCAQMD guidance for HRAs has been extended to include operations that include frequent, numerous and long-term mobile sources such as heavily travelled freeways, truck stops, distribution centers and ports. The Project is not a land use that use, store, or process carcinogenic or non-carcinogenic toxic air contaminants in sufficient quantities and duration to pose a risk to human health nor does it involve frequent and numerous truck activity. In addition, construction activities associated with the Project would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that are intended to protect sensitive receptors from substantial concentrations of pollutants. Based on the above, impacts would be less than significant.

**Table B.III-5**
**Maximum Localized Significance Threshold (LST) Emissions[a] (pounds/day)**

| Source | NOx | CO | PM10 | PM2.5 |
|---|---|---|---|---|
| **Construction** | | | | |
| Total unmitigated maximum emissions | 29 | 23 | 3.5 | 2.1 |
| LST threshold | 62 | 551 | 4.0 | 2.3 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |
| **Operational** | | | | |
| Project Area/energy emissions | 1 | 1 | <0.1 | <0.1 |
| Existing Area/energy emissions | <1 | <1 | <0.1 | <0.1 |
| Net Area/energy emissions | 1 | 1 | 2.0 | <0.1 |
| LST threshold | 62 | 551 | 2.00 | 0.7 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |

*Notes:*
*Emission calculations are provided in* ***Appendix A.***
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
*The operational emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.*
*CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.*
[a] LST for a 1.18-acre site, *LST values were interpolated between the 1-acre and 2-acre values accordingly, then rounded down to the nearest whole number.*

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

**Less than Significant Impact.** A significant impact could occur if a project generated objectionable odors that adversely affected sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors are anticipated. During construction, construction equipment, the application of asphalt, the application of architectural coatings, and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. Adherence with SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the proposed uses. Therefore, impacts from the Project would be less than significant.

# IV. BIOLOGICAL RESOURCES

| Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☒ |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☐ | ☒ |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☒ |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ☒ |

***a. 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?***

**No Impact.** A project could have a significant impact on biological resources if it would result in (a) the loss of individuals, or the reduction of existing habitat of a State- or federal-listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project site is currently developed with an existing market and related surface parking. The Project site does not contain any critical habitat or support 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 (CDFW) or US Fish and Wildlife Service (USFWS). No street trees or sensitive species were identified on the Project site. Therefore, no impacts would occur.

***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?***

**No Impact.** The Project site is within a developed and heavily urbanized area within the City of Los Angeles. The Project site is occupied by an existing market and related surface parking lot. No riparian or other sensitive natural community is on or adjacent to the Project site. No impacts would occur.

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

**No Impact.** A project could have a significant impact on biological resources if it would result in the alteration of an existing wetland habitat. The Project site is entirely developed and covered with impermeable surfaces. The Project site does not contain any wetlands or natural drainage

channels. The Project site does not have the potential to support any riparian or wetland habitat as defined by Section 404 of the Clean Water Act. No impacts would occur.

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

**No Impact.** A project could have a significant impact on biological resources if it would interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project site is in an area that has been previously developed in a heavily urbanized area of the South Los Angeles community of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. No impacts would occur.

### *e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?*

**No Impact.** A project-related, significant adverse effect could occur if the Project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance[10] or the City's adopted street tree policies.

Implementation of the Project site would not affect any street trees or other protected biological resources. Therefore, no impacts would occur.

### *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?*

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

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

# V. CULTURAL RESOURCES

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

### *a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

**Less than Significant Impact.** A significant impact could occur if the Project would disturb historic resources that presently exist within the Project site. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

The Project site is currently developed with a market and related surface parking. The existing structures are not designated for listing on the National Register of Historic Places, California Register of Historic Places, or the Los Angeles Historic Cultural Monument list. Additionally, the existing structures have not been identified as culturally significant through SurveyLA, a

comprehensive program by the City of Los Angeles Office of Historic Resources to identify significant historic resources.

The nearest historic resources or potentially historic resources are 1400 S Magnolia Ave, 1333 S Arapahoe St, and 1409 S Arapahoe St located less than 0.1 miles south of the Project site but are not immediately adjacent to the Project site.[11]

Section 15064.5(b)(2) of the State CEQA Guidelines states that a Project would cause a substantial adverse change in the significance of a historic resource if it:

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Due to their physical separation, construction and operation of the Project would not alter the physical characteristics, historic context, or feeling associated with the nearby historic resources. Therefore, impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur if grading or excavation activities associated with the Project would disturb unique archaeological resources that could exist within the Project site. The Project site is located within an urbanized area that has been subject to grading and development in the past. Furthermore, a records search of the California Historic

11 HistoricPlacesLA, *Los Angeles Historic Resources Inventory,* database, http://www.historicplacesla.org/search, accessed June 2017.

Resource Information System did not reveal any record of archaeological resources found in the vicinity of the Project site.[12] As such, the likelihood of unearthing unique archeological resources is considered low. Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidently discovered during construction. As a condition of approval, the City of Los Angeles requires that if archeological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated. With compliance, any potential archeological impacts of the Project would be less than significant.

### *c. Disturb any human remains, including those interred outside of formal cemeteries?*

**Less than Significant Impact.** A significant adverse effect could occur if grading or excavation activities would disturb previously interred human remains. The Project site is in an urbanized area and has been subject to grading and development in the past. No known burial sites are located on or adjacent to the Project site. Furthermore, the Project Applicant shall be required to comply with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 that specify the protocol if human remains are discovered during excavation, grading, or construction activities. If human remains are encountered State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. With compliance of State Health and Safety Code Section 7050.5, any potential impacts of the Project would be less than significant.

12 Cultural Resource Inventory for the 2268 Pico Boulevard Project in Los Angeles, Los Angeles County, California, PaleoWest, March 7, 2019, included as Appendix E to this Initial Study

# VI. ENERGY

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

### *a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The Project would be designed and operated in accordance with the applicable State Building Code Title 24 regulations and California Green Building code, which impose energy conservation measures. The majority of the energy usage in the Project consists of lighting and climate control. Adherence to the aforementioned energy requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency. As such, impacts of the Project would be less than significant.

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

As discussed above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2016 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As such, impacts of the Project would be less than significant.

# VII. GEOLOGY AND SOILS

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

| | | | | |
|---|---|---|---|---|
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☒ | ☐ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |

***a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.***

**Less than Significant Impact.** A significant impact could occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to the City's General Plan, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.[13] The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, but is located within a fault zone, the Puente Hills Blind Thrust. However, the potential risk for surface fault rupture through the Project site is considered low. Impacts would be less than significant.

***ii. Strong seismic ground shaking, caused in whole or in part by the project's exacerbation of the existing environmental conditions?***

**Less than Significant Impact.** A significant impact could occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California.

As previously discussed, the Project site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting. The nearest potentially active faults are the Puente Hills Blind Thrust Fault, the Santa Monica-Hollywood Fault, and the Newport-Inglewood-Rose Canyon

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

strike-slip fault, all within 5 miles of the Project site.[14] The Project would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region. As such, impacts would be less than significant.

***iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?***

**Less than Significant Impact.** A significant impact could occur if a Project site is located within a liquefaction zone. As stated in the City's General Plan, Safety Element, and as noted in the City's parcel information report, the Project site is not located within an area identified as having a potential for liquefaction. Impacts would be less than significant.

***iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?***

**No Impact.** A project could have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. A project-related, significant adverse effect may occur if the project is in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project site is on relatively level terrain. According to the California Division of Mines and Geology Seismic Hazard Zones Map of the Hollywood Quadrangle[15] and the City of Los Angeles Safety Element,[16] the Project site is not located in a designated earthquake-induced landslide hazard zone. Therefore, the probability of landslides is considered to be very low. No impacts would occur.

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

**Less than Significant Impact.** A project could have significant sedimentation or erosion impacts if it would (a) constitute a geologic hazard to other properties by causing or accelerating instability

14 USGS, Earthquake Fault Map, https://earthquake.usgs.gov/hazards/qfaults/, last accessed June 2017

15 California Department of Conservation, Division of Mines and Geology, "Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California" (1998).

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

from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on site.

Although development of the Project site has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the site; furthermore, the Project site would be almost entirely built upon, with little or no soil exposed.

All grading activities would require grading permits from the Los Angeles Department of Building and Safety (LAD'S) and would be required to comply with the standards designed to limit potential erosion impacts. All on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The grading plan would conform to the City's Landform Grading Manual Guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. For all these reasons, Project impacts would be less than significant.

***c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?***

**Less than Significant Impact.** A project could have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact could occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

As previously discussed, the Project site is not located within a liquefaction zone and the potential for seismically induced settlement at the Project site is considered small. The design and construction of the Project would be to the satisfaction of the LADBS to ensure favorable conditions for the permanent retaining structure. Additionally, construction of the Project would comply with the City of Los Angeles Uniform Building Code which is designed to assure safe

construction and includes building foundation requirements appropriate to site conditions. Code requirements to prevent soil erosion and liquefaction would be implemented. For all these reasons, Project Impacts would be less than significant.

***d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?***

**Less than Significant Impact with Project Mitigation**. A project could have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact could occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and that shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

The Project site is currently improved with a market and a related surface parking lot. Based on soil borings from the Phase II Report, subsurface soil generally consists of san and clay[17], and therefore, the soil may have the potential to expand. Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which includes building foundation requirements appropriate to site-specific conditions. Impacts would be less than significant with implementation of Mitigation Measure **MM GEO-1**.

17 Western Environmental Engineers Company (WEECO), *Phase 2 Environmental Site Assessment* (July 5, 2016)

***Mitigation Measures:*** The Project Applicant shall adopt the following mitigation measure in order to reduce potential impacts to a less than significant level.

**MM-GEO 1: Soil Condition**

Prior to the issuance of grading or building permits, the applicant would be required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss building design consideration that include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. After its review of the geotechnical report, the Department of Building and Safety shall issue a Geology and Soils Report Approval Letter for the proposed Project. The project shall comply with all conditions contained within the letter.

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

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

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

**Less than Significant Impact.** A significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or geologic features that presently exist within the Project site. The Project site has been previously graded and is currently improved with an existing market and related surface parking. The Project site and immediate surrounding areas do not contain any known vertebrate paleontological resources. As such, the likelihood of unearthing unique paleontological resources is considered low. As a condition of approval, the City of Los Angeles requires that if paleontological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated. With compliance, any potential paleontological impacts of the Project would be less than significant

# VIII. GREENHOUSE GAS EMISSIONS

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

### *a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

**Less than Significant Impact**. A significant impact could occur if a project would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. The background and regulatory context of GHG emissions is discussed in the Air Quality Report included as an **Appendix A** of this Initial Study.

As detailed therein, construction and operational GHG emissions were modeled using CalEEMod for each year of construction of the Project and for the typical year of operation. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions.

The California Air Pollution Control Officers Association (CAPCOA) suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. Although GHG emissions are quantified and shown in **Table B.VII-1, Annual Greenhouse Gas Emissions**, CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project. **Table B.VIII-1**, based on the Air Quality Report in **Appendix A**, references a draft threshold that was considered, but not adopted, by SCAQMD or the City. As shown, the net increase in GHG emissions generated by the Project would be 680 MTCO2e per year.

**Table B.VIII-1**
**Annual Greenhouse Gas Emissions**

| GHG Emissions Source | Emissions ($MTCO_2e$/year) |
|---|---|
| Project Construction | 512 |
| Construction (amortized) | 17 |
| Operational (mobile) sources* | 1,164 |
| Area sources | <1 |
| Energy (Gas and Electricity) | 725 |
| Waste | 9 |
| Water | 26 |
| **Annual Total** | **1,941** |
| **Existing** | **1,261** |
| **Net Total** | **680** |

*Source: CalEEMod.*
*Notes: Emissions calculations are provided in* ***Appendix A***
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
***The emissions of the Project represent the net difference between the existing greenhouse generated uses that would be removed and the Project greenhouse gas emissions.***
*$MTCO_2e$ = metric tons of carbon dioxide emissions.*
** N2O emissions account for 0.05 MTCO2e/year.*

The impact of GHG emissions is global in nature and the analysis of impacts should focus on the project's effect on climate change.[18] Assessing the significance of a project's contribution to cumulative global climate change involves (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional State agency. As described below, the Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the *South Los Angeles Community Plan*, *LA Green Plan* and *Sustainable City pLAn.* As such, impacts would be less than significant.

18 CEQA And Climate Change, Governor's Office Of Planning And Research, State Of California Http://Opr.Ca.Gov/Ceqa/Climate-Change.Html

### *b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

***Less than Significant Impact.*** Applicable plans and policies adopted to reduce greenhouse gas emissions include SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Sustainable City pLAn.

#### *Sustainable Communities and Climate Protection Act (SB 375)*

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. This act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035. As mentioned above, the Project would be within the employment and population forecasts.

#### *Consistency with SCAG 2016–2040 RTP/SCS*

Senate Bill (SB) 375, authored by Senate President Pro Tem Darrell Steinberg, was signed into law on September 30, 2008. SB 375 is the most ambitious attempt yet to coordinate planning for land use and transportation at a regional scale, with the goal of reducing the amount that people have to drive and associated greenhouse gases.[19] As mentioned previously, projects that are consistent with the population forecasts identified in the Growth Management chapter forms the basis of the land use and transportation control portions of the AQMP. According to the SCAG estimates, the 2015 population within Los Angeles County is 10,158,776 residents. The population projections used to estimate emissions in the 2016 AQMP for the year 2040 anticipated a population of 11,513,435 by the year 2040. The project would not generate any residences. As such, the project would be consistent with the planned land uses and employment growth for Los Angeles and would not conflict with the AQMP.

#### *City of Los Angeles Sustainable City pLAn*

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

19 Climate Plan, *SB 375 Fact Sheet,* http://www.climateplan.org/wp-content/uploads/2011/05/TransForm-SB-375-4-page-Statewide-Oct-2011.pdf.

carbon and climate leadership and waste and landfills. The pLAn also addresses the housing shortage in the City by calling for 100,000 new housing units by 2021, leading to 150,000 new housing units by 2035, with policies to encourage that 57 percent of these units be built near transit in 2025 and 65 percent by 2025 to help the City meet its GHG reduction goals. In 2014, 43 percent of new housing units in the City were built near transit.

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

The Project would be consistent with the planned land use for the South Los Angeles Community Plan area and would not conflict with the AQMP. Based on the above, the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gases. Impacts would be less than significant.

# IX. HAZARDS AND HAZARDOUS MATERIALS.

The following section incorporates by reference information from the *Phase 2 Environmental Site Assessment Report,* dated July 5, 2016 and prepared by Western Environmental Engineers Company (WEECO) on behalf of the Applicant is shown in **Appendix B**.

| Would the project: | **Potentially Significant Impact** | **Less Than Significant with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment? | ☐ | ☐ | ☒ | ☐ |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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? | ☐ | ☐ | ☒ | ☐ |

| | | | | |
|---|---|---|---|---|
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions? | ☐ | ☐ | ☐ | ☒ |

### *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 project could have a significant impact to hazards and hazardous materials if (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The types and amounts of hazardous materials that would be used in connection with the Project would include typical housekeeping products used for cleaning, landscaping, or other routine maintenance. The routine use and disposal of normal products is not considered to create a significant hazard to the public or the environment.

Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. However, all potentially hazardous materials would be used and stored in accordance with applicable Federal, State, and Local regulations. As such, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

### *b. Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?*

**Less than Significant Impact.** A project could have a significant impact to hazards and hazardous materials if (a) A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) A project involved the creation of any health hazard or potential health hazard. A common list of potentially hazardous materials that may be found at the Project site could consist of, but are not limited to, the following:

### Asbestos-Containing Materials

Asbestos is a crumbly material often found in older buildings, typically used as insulation in walls or ceilings. It was formerly popular as an insulating material because it had the desirable characteristic of being fire resistant. However, it can pose a health risk when very small particles become airborne. These dust-like particles can be inhaled, where their microscopically sharp structures can puncture the tiny air sacs in the lungs, resulting in long-term health problems. The Department of Toxic Substance Control (DTSC) classifies asbestos waste as potentially hazardous if it is greater than 1 percent and easily crumbled (friable). Based on the age of the on-site building, the potential for asbestos-containing building materials at the Project site is possible. The Project Applicant would be required to comply with the South Coast Air Quality Management District's Rule 1403, which details procedures for asbestos-containing materials, as well as all other applicable State and Federal rules and regulations regarding the disposal of asbestos-containing materials (ACMs).

### Lead-Based Paint

While lead-based paint was taken off the market, it is estimated that 80 percent of existing buildings built prior to 1978 contain lead paint. Based on the age of the existing on-site building, there is a potential for lead-based paint at the Project site. However, the Project Applicant would be required to comply with the applicable OSHA regulations regarding the handling and disposal of lead-based paint. However, the Applicant shall comply with the Regulatory Compliance Measure and standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

### Polychlorinated Biphenyls

Polychlorinated Biphenyls (PCBs) are man-made organic chemicals that were formerly manufactured for use in various industrial and commercial applications as a result of their non-flammability, chemical stability, high boiling point, and electrical insulating properties. While the manufacture of PCBs was banned in 1979, these hazardous materials may be found in products associated with transformers, electrical equipment, motor oil, hydraulic systems, cable and thermal insulation, adhesives and tapes, oil-based paint, caulking, plastics, and floor finish.[20] The Applicant will comply with PCB regulation of 15 U.S.C 2615(b) if a PCB substance contained 50

20 US Environmental Protection Agency (USEPA), “Polychlorinated Biphenyls,” http://www.epa.gov/wastes/hazard/tsd/pcbs/about.htm (accessed June 2017).

ppm or greater is found on site. Compliance with these regulations will result in less than significant impacts.

**Methane and Radon Gas**

According to the City's parcel records, the Project site is not located within a Methane Buffer Zone.[21] According to the Radon Potential Zone Map for Southern Los Angeles County, California,[22] the Project site is not located within a radon zone. No further investigations related to these hazards would be 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 project could have a significant impact to hazards and hazardous materials if (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or (b) the project involved the creation of any health hazard or potential health hazard.

The closest schools to the Project site are the Magnolia Avenue Elementary School, located 0.2 miles south at 1626 Orchard Avenue, University Prep Value High School, located 0.25 miles west at 11929 W Pico Boulevard, and Leo Politi Elementary School, located 0.3 miles north at 2481 W 11th Street. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project site and use of these substances would comply with State health codes and regulations. Therefore, the Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

21 City of Los Angeles Department of Planning, *Zone Information and Map Access System (ZIMAS),* accessed June 2017, http://zimas.lacity.org/.

22 California Geologic Survey, *Radon Potential Zone Map for Southern Los Angeles County, California,* map, prepared by Ron Churchill (January 2005), http://www.conservation.ca.gov/cgs/minerals/hazardous_minerals/radon/Documents/sr182map.pdf.

***d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?***

**Less than Significant Impact.** The Project site is currently developed with a retail building, related surface parking and The Project site is currently developed with a market and related surface parking. No aboveground storage tanks (ASTs) have been identified at the Project site, nor was there any indication of an underground storage tank (USTs) on the Project site.[23] There are 6 leaking underground storage tanks (LUSTs) within one-half mile of the Project site, all of which have been remediated and closed.[24] Based on the distance to the Project site and the status of the cases, these properties are not considered to pose a significant hazard to the Project site. Impacts would be less than significant.

***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 have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?***

**No Impact.** A significant impact may occur if a project is located within a public airport land use plan area, or within 2 miles of a public airport, and subject to a safety hazard. The closest public airports to the Project site are the Bob Hope Airport, Santa Monica Airport, and the Los Angeles International Airport (LAX), all approximately 10 miles to the north, west, and southwest of the Project site, respectively. None of these airports are located within 2 miles of the Project site. No impacts would occur.

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

**Less than Significant Impact.** A project could have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan.

23 Western Environmental Engineers Company, *Phase 2 Environmental Site Assessment* (July 5, 2016).
24 State Water Resources Control Board, *GeoTracker,* http://geotracker.waterboards.ca.gov/, accessed June 2017.

The Project site is located on Pico Boulevard, between Magnolia Avenue and Arapahoe Street, none of which are a selected disaster route as identified by the City's General Plan.[25] However, the Project site is located approximately 0.2 miles to the west of S. Alvarado Street, which is a selected disaster route. While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures that could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Impacts would be less than significant.

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

**No Impact.** The Project site is in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[26] No impacts would occur.

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

26 City of Los Angeles Department of City Planning, *ZIMAS,* "Parcel Profile Reports," http://www.zimas.lacity.org, accessed September 2016.

# X. HYDROLOGY AND WATER QUALITY

| Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | ☐ | ☐ | ☒ | ☐ |
| b. Substantially decrease groundwater supplies or interfere 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, in a manner which would; | | | | |
| i. Result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| j. Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ | ☒ |

### *a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

**Less than Significant Impact.** A project could have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System

(NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the Project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

**Construction Impacts**

The 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) earthmoving activities, which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. Under the NPDES, the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system.

Surface water runoff from the Project site would continue to be collected on the Project site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention will be required as part of the Low Impact Development (LID) and SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Additionally, any pollutants from the parking areas on the Project site would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period, which would reduce the Project's impact to the stormwater infrastructure. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With regulatory compliance, any potential water quality impacts from the Project during construction would be less than significant.

**Operation Impacts**

The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project site as compared to the current conditions. City of Los Angeles Ordinance Nos. 172,176 and 173,494 specify Storm Water and Urban Runoff Pollution Control, which requires the application of BMPs. The Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Full compliance with the LID Ordinance and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

***b. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would***

***c. Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?***

**Less than Significant Impact**. A project could have a significant impact on groundwater level if it would change potable water levels sufficiently to (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

The Project is not adjacent to a well field nor part of a substantial groundwater recharge area. Most of the surface water runoff from the Project site is directed to adjacent storm drains though some percolation occurs around the existing residential properties. Given the relatively small pervious site area and the location, the development of the existing residential lots to impervious surfaces would not substantially interfere with groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts on groundwater would be less than significant.

### *d. Result in substantial erosion or siltation on- or off-site?*

**Less than Significant Impact.** A project could have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project site is in a highly-urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project site is fully developed with impervious surface. Implementation of the Project would not increase site runoff or result in changes to the local drainage patterns. Implementation of a SWPPP for the Project would reduce the amount of surface water runoff after storm events because the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period. Impacts would be less than significant.

### *e. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?*

**Less than Significant Impact.** A project could have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project site is fully developed with impervious surface. Implementation of the Project would not result in a significant increase in site runoff or cause any changes in the local drainage patterns that would result in flooding on or off site. Impacts would be less than significant.

### *f. 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?*

**Less than Significant Impact.** A project could have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of stormwater runoff from the Project site were to increase to a level that exceeds the capacity of the storm drain system serving the Project site. A Project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

The Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is, and would continue to be, collected

on the site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

### *g. Impede or redirect flood flows?*

**No Impact.** A significant impact could occur if a Project was located within a 100-year flood zone and would impede or redirect flood flows. According to FEMA Map, 06037C1620F, the Project site is located in Zone X Area of Minimal Flood Hazard.[27] The Project site is in a highly-urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project. Therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

### *h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

**No Impact.** A significant impact could occur if the Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam. According to the Safety Element of the City General Plan, the Project site is not located within a potential inundation area. As such, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. No impacts would occur.

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

**No Impact.** A significant impact would occur if the Project site were sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (e.g., seiche and tsunami), or if the Project site were located adjacent to a hillside area with soil

27 Federal Emergency Management Agency, *Flood Map Service Center,* Map Number 06037C1620F, Effective 09/26/2008, https://msc.fema.gov/portal/search#searchresultsanchor.

characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project site is not located in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project site is relatively flat and is surrounded by urban development. Therefore, there are no sources of mudflow within the vicinity of the Project site. No impacts would occur.

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

**No Impact.** A significant impact would occur if the Project site were sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (e.g., seiche and tsunami), or if the Project site were located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project site is not located in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project site is relatively flat and is surrounded by urban development. Therefore, there are no sources of mudflow within the vicinity of the Project site. No impacts would occur.

### *k. Inundation by seiche, tsunami, or mudflow?*

**No Impact.** As mentioned previously, the Project site is not located in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project site is relatively flat and is surrounded by urban development. Therefore, there are no sources of mudflow within the vicinity of the Project site. No impacts would occur.

# XI. LAND USE AND PLANNING

| Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | ☐ | ☐ | ☐ | ☒ |

### *a. Physically divide an established community?*

**No Impact.** A significant impact could 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.

The Project site is in the South Los Angeles Community Plan Area of the City of Los Angeles. The neighborhood is urbanized. No alteration of street pattern is proposed and no separation of uses or disruption of access between land use types would occur as a result of the Project. Therefore, the Project would not significantly disrupt or divide the physical arrangement of the established community. No impacts would occur.

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

**Less than Significant Impact.** A significant impact could occur if a project is inconsistent with the General Plan or zoning designations currently applicable to a Project site, and would cause adverse environmental effects, which the General Plan and Zoning Ordinance are designed to avoid or mitigate.

The Project site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the designations and regulations of several local and regional land use plans and the municipal zoning code.

***SCAG Regional Comprehensive Plan***. The Project site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The guiding principles of the RCP are as follows: (1) Improve mobility for all residents; (2) Foster livability in all communities; (3) Enable prosperity for all people; and (4) Promote sustainability for future generations.

The Project would be consistent with policies set forth in the RCP because it would develop an underdeveloped site within an existing urban setting. Relevant land use goals of the RCP include focusing growth along transportation corridors; targeting growth within walking distance of transit; and injecting new life into under-used areas. The Project would further these strategies by redeveloping an underutilized commercial property with a denser mixed-use project that is within walking distance of a transit hub. Impacts would be less than significant.

***City of Los Angeles General Plan***. The land use component of the City of Los Angeles General Plan is set forth in the General Plan Framework (GPF) and in Community Plans. The GPF sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. GPF land use policies are further guided at the community level through community plans and specific plans. The GPF Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. The GPF land use map shows the Project site as along a Mixed-Use Boulevard, which is described as featuring "a range of floor area ratios from 1.5:1 up to 4.0:1".[28] The Project is consistent with this classification.

The Project site is located within the South Los Angeles Community Plan Area. A new South Los Angeles Community Plan was adopted by the City in 2017 and as a result new land use designations and zoning became effective in December 2018. However, the application was submitted for prior to the adoption of the new community plan, as such, the prior plan is also applicable to the Project.

28 City of Los Angeles, General Plan Framework, 2003, Figure 3-2 Long Range Land Use Diagram South Los Angeles

The new Community Plan Land Use Map designates the site as Neighborhood Commercial, which corresponds to a range of commercial zoning classifications.[29] The South Los Angeles Community Plan describes policies for Neighborhood Commercial areas as encouraging "vibrant and attractive streets with pedestrian-oriented development facing the sidewalks and with parking located out of view" and "seek to address the over-concentration of certain uses while promoting a diverse and equitable distribution of retail, services and healthy food options."[30] By developing an underutilized site in a way that improves the streetscape, puts parking out of view, and diversifies the land uses within the corridor, the Project does not conflict with these goals.

The previous Community Plan Land Use Map designated the site as Commercial Manufacturing and Low Medium Residential. As such, the Project included a request to amend the Community Plan Land Use Map to designate the site as Neighborhood Commercial, with which the Project would be consistent. As this request for change in land use designation aligns with the Community Plan update adopted by the City, impacts would be less than significant.

***Los Angeles Municipal Code***. Development of the Project site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I, the Planning and Zoning Code.

In conjunction with the adoption of the new community plan, and consistent with the land use designation, the Project site has been rezoned to C2-1VL-CPIO. The C2 zone permits a variety of commercial uses, such as retail with limited manufacturing; offices; hotels; retail; auto sales, service stations and garages; churches and schools; and residential uses including multifamily apartment houses. The Height District No. 1VL limits the Floor Area Ratio (FAR) to 1.5:1 for commercial uses and to 3:1 for residential uses and the height to 3 stories or 45 feet. The CPIO designation indicates the Project site is within a Community Plan Implementation Overlay District.

However, the application was submitted for a Vesting Zone Change request prior to the adoption of the new community plan. Under the prior plan, the Project site was zoned [Q]C2-1 and RD1.5-1. The C2 zone permits a variety of commercial uses, such as retail with limited manufacturing; offices; hotels; retail; auto sales, service stations and garages; churches and schools; and residential uses including multifamily apartment houses. The RD zone permits one, two, and three family dwellings, apartment houses, and home occupations with restricted density. The Height District No. 1 limits the Floor Area Ratio (FAR) to 1.5:1 for commercial uses and to 3:1 for residential uses and the height to 5 stories or 75 feet for commercial uses and 3 stories or 45 feet for residential uses.

29 City of Los Angeles, South Los Angeles Community Plan, 2017, Land Use Map
30 City of Los Angeles, South Los Angeles Community Plan, 2017, 3-32

The Project is consistent with the uses under the current and previous zoning classifications. The Project would exceed the Height District limitations and therefore the Project includes a requested Height District Change to Height District 2 that allows a maximum FAR of 6:1. The Project would be developed to an FAR of 2.9:1. This building intensity would be within the guidance of the General Plan Framework regarding Mixed Use Boulevards. Impacts would be less than significant.

## XII. MINERAL RESOURCES

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

### *a. 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 could occur if a Project site is in an area used or available for extraction of a regionally-important mineral resource, or if a project would convert an existing or future regionally-important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project site is not located within a designated MRZ-2 Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[31] No mineral resources are known to exist beneath the Project site. Therefore, no impacts associated with the loss of availability of a known mineral resource would occur.

### *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.** As noted, the Project site is not located within an MRZ-2 Area. The Project site is not designated as a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

31 *City of Los Angeles General Plan,* "Conservation Element" (2001).

## XIII. NOISE

| Would the project result in: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☒ | ☐ | ☐ |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

### *a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Less than Significant Impact with Mitigation Incorporated.** A significant impact could occur if a project would generate excessive noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles Noise Ordinance (Noise Ordinance). The City's Noise Ordinance (Section 112.05 of the LAMC) prohibits construction equipment noise that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet. However, the Noise ordinance also states that this limitation does not apply where compliance is technically infeasible.

The City considers construction activities lasting more than one day that would increase the ambient noise levels by 10 dBA or more at a noise-sensitive location or construction activities lasting more than 10 days in a 3-month period that would increase ambient noise levels by 5 dBA or more at a noise-sensitive location to expose persons excessive noise levels.

To identify the existing ambient noise levels at nearby off-site sensitive receptors as well as the general vicinity of the Project site, noise measurements were taken using monitoring equipment that conforms to industry standards and the requirement specified in Section 111.01(l) of the LAMC shown in **Appendix C**. The measured noise levels are shown in **Table B.XIII-1, Existing Ambient Daytime Noise Levels in the Project site Vicinity**.

Construction of the Project would require the use of heavy equipment for demolition, site clearing, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

USEPA has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities.[32] Based on this data, **Table B.XIII-2, Typical Outdoor Construction Noise Levels** presents composite noise levels pertaining to the type and number of construction equipment that would occur at the Project site.

**Table B.XIII-1**
**Existing Ambient Daytime Noise Levels in the Project Vicinity**

| Site | Location | Leq (15-minute) |
|---|---|---|
| Site 1 | Project site along W Pico Boulevard | 66.6 |
| Site 2 | Project site along Arapahoe Street | 57.2 |
| Site 3 | Southwestern boundary of Project site | 57.5 |

The nearest sensitive receptors are the residential units immediately south of the Project site and across the street of Pico Boulevard, Magnolia Avenue, and Arapahoe Street. Given the measured ambient noise levels along the southern portion of the Project site, construction noise would exceed ambient exterior noise levels at the nearest identified off-site sensitive receptors by more than 5 dBA during construction.

32 USEPA, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances,* PB 206717 (1971).

**Table B.XIII-2**
**Typical Outdoor Construction Noise Levels**

| Construction Phase | Approximate Leq dBA with Mufflers | | | |
|---|---|---|---|---|
| | 25 Feet | 50 Feet | 100 Feet | 200 Feet |
| Demolition | 92 | 86 | 80 | 74 |
| Site Preparation | 88 | 82 | 76 | 70 |
| Grading | 93 | 87 | 81 | 75 |
| Building Construction | 94 | 88 | 82 | 76 |
| Architectural Coating | 88 | 82 | 76 | 70 |

*Source: US Department of Transportation, Construction Noise Handbook, Chapter 9.0 (August 2006).*

The Project shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturer's standards and specifications. Even with this implementation, individual pieces of construction equipment anticipated during Project construction could produce maximum noise levels of 75 dBA to 90 dBA at a reference distance of 50 feet from the noise source as shown in **Table B.XIII-3, Estimated Construction Noise Levels (Leq) at Off-Site Sensitive Receiver Locations**. As such, a substantial temporary increase in ambient noise levels would occur at the identified off-site sensitive receptors. Impacts would be potentially significant. As such, Mitigation Measures **MM NOI-1** and **MM NOI-2** identified below shall be incorporated into the Project to reduce noise levels to the extent feasible.

**Table B.XIII-3**
**Estimated Construction Noise Levels (Leq) at Off-Site Sensitive Receiver Locations**

| Location | Distance from Closest Edge of Construction Activity to Noise Receptor (ft.)[a] | Estimate Maximum Construction Noise levels (dBA Leq) | Significance Threshold[b] | Exceed Significance Threshold? |
|---|---|---|---|---|
| Site 2 | 50 | 80 | 62 | Yes |
| Site 3 | 25 | 85 | 62 | Yes |

*Source: ESA, 2268 W Pico Blvd Hotel Project Noise and Vibration Technical Report, 2017.*
*Notes: There are no noise-sensitive uses directly north of the Project site. Sensitive uses are located behind commercial buildings north of W Pico Boulevard and would be shielded from Project noise. Therefore, Project noise impacts would not be expected to occur at these uses located north of location R1.*
*ft. = feet.*
*[a] The distance represents the nearest construction area on the Project site to the property line of the off-site receptor.*
*[b] The significance threshold is the daytime ambient equivalent noise levels (Leq) as shown in **Table B.XII-1** plus 5 dBA.*

***Mitigation Measures:*** The incorporation of the following mitigation measures into the Project would reduce construction noise impacts to a less than significant level.

**MM-NOI-1** **Increased Noise Levels (Demolition, Grading and Construction Activities)**

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Temporary noise barriers shall be installed on the property line of the construction site abutting residential uses. The noise barrier shall be engineered to reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10dBA. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all activities on the Project site are complete.
- The Project shall limit the number of noise-generating heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously used on the Project site within 50 feet of off-site noise sensitive receptors adjacent to the south of the Project site to generally no more than two to three pieces of heavy-duty off-road equipment

### *b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?*

**Less than Significant Impact.** Vibration is sound radiated through the ground. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical

equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction activities have the potential to generate low levels of ground-borne vibration. The operation of construction equipment generates vibrations that propagate through the ground but diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significant threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings are used to evaluate potential impacts related to project construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[33]

- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.5 inches per second (ips) at any building that is constructed with reinforced concrete, steel, or timber.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.3 ips at any engineered concrete and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.2 ips at any nonengineered timber and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 ips at any historical building or building that is extremely susceptible to vibration damage.

33 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (May 2006); and California Department of Transportation, *Transportation- and Construction-Induced Vibration Guidance Manual* (June 2004).

**Table B.XIII-4, Vibration Source Levels for Construction Equipment**, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project site during construction.

**Table B.XIII-4**
**Vibration Source Levels for Construction Equipment**

| | Approximate PPV (in/sec) | | | | | |
|---|---|---|---|---|---|---|
| Equipment | 25 Feet | 50 Feet | 60 Feet | 75 Feet | 100 Feet | 200 Feet |
| Large Bulldozer | 0.089 | 0.031 | 0.024 | 0.017 | 0.011 | 0.004 |
| Loaded Trucks | 0.076 | 0.027 | 0.020 | 0.015 | 0.010 | 0.003 |
| Small Bulldozer | 0.003 | 0.001 | 0.0008 | 0.0006 | 0.0004 | 0.0001 |

The nearest off-site residential building is located to the south of the Project site. The existing building on the Project site is located approximately 50 feet away from the nearest off-site residential building. Therefore, the biggest source of vibration, large bulldozers would be expected to generate vibration levels of approximately 0.031 inches per second PPV or less and would not generate vibration levels in excess of 0.5 inches per second PPV. Therefore, construction vibration impacts would be less than significant and mitigation measures would not be required.

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which could produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking structure area. Ground-borne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project site based on FTA data.[34] The potential vibration levels from all Project operational sources at the closest existing and future sensitive-receptor locations would be less than the significance threshold of 0.5 inches per second PPV for structural damage. As such, operational vibration impacts associated with operation of the Project would be below the significance threshold and impacts would be less than significant.

### *c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

***Less than Significant Impact.*** A significant impact could occur if the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. The primary long-term noise source associated with the Project would be

34 Federal Transit Administration (FTA), 2006. Transit Noise and Vibration Impact Assessment (2006).

Project-related traffic. If a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts would result in a substantial increase in ambient noise. As evaluated in Section B.XVI Traffic and Transportation, the Project would not result in a substantial permanent increase of existing traffic volumes. As such, traffic-generated noise impacts would be less than significant.

### *d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

**Less than Significant Impact with Project Mitigation.** The Project does not involve uses that are sources of substantial increases in periodic noise. Noise from traffic and the residential activities associated with the Project exist in the Project vicinity without the Project. Construction of the Project would require haul and vendor truck trips to and from the site to export soil and delivery supplies to the site. Trucks traveling to and from the Project site would be required to travel along a haul route approved by the City of Los Angeles. During Project construction, the nearest and most affected off-site noise sensitive receptors that would be exposed to increased noise levels would be the existing residential uses located in proximity to the Project site. Implementation of **MM-NOI-1** would reduce construction-related noise to less than the significance threshold at the off-site sensitive uses.

**Mitigation Measures**: Mitigation measures **MM-NOI-1**, as identified above, would reduce potential construction noise impacts to a less than significant level.

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

**No Impact.** A significant impact may occur if a proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near a Project site. There are no airports within a 2-mile radius of the Project site. The Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

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

**No Impact.** The Project site is not located in the vicinity of a private airstrip. No impact would occur.

## XIV. POPULATION AND HOUSING

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

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

**Less than Significant Impact.** A significant impact could occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. At the time of the 2010 Census, the South Los Angeles Community Plan area contained 271,040 residents; the City estimated a 2014 population of 290,383 residents.[35] Implementation of the Project would accommodate hotel guests and would not add permanent residents to the area. According to an Employment Density Study conducted by SCAG, for a hotel with 77,282 gross square feet, there would be an addition of approximately 66 employees on the Project site.[36] The City of Los Angeles had a total of 1,696,400 employees in 2012, and estimates a total of 2,169,100 employees by the year 2040, the addition of 66 employees would be approximately 0.003 percent of the projected employment population in the City of Los Angeles for the year 2040.[37] However, it should be noted that these employees are likely to come from the greater Los Angeles area, and would therefore not significantly increase the population. As such, the Project would not cause substantial growth. In addition, the Project would not occur in an undeveloped area nor would it introduce unplanned infrastructure. Impacts would be less than significant.

35 Los Angeles Department of City Planning, *2014 Growth & Infrastructure Report.*
36 The Natelson Company Inc, *Employment Density Study,* p. 4, Table II-A.
37 Southern California Association of Governments, *Final 2016 RTP/SCS, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (April 2016), Demographics and Growth Forecast.

### *b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** The Project would involve the demolition of a market and related surface parking. The Project would not result in the displacement of any existing people or housing units and would therefore not necessitate the construction of replacement housing. No impacts would occur.

# 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? | ☐ | ☐ | ☒ | ☐ |

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

***i. Fire protection?***

**Less than Significant Impact**. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; for a commercial land use, the distance is 1 mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The Project could potentially increase the demand for LAFD services. The Project site is served by the Central Bureau LAFD Station No. 13, located at 2401 W Pico Boulevard, approximately 0.2 miles west of the Project site. Based on the response distance criteria specified in LAMC Section 57.09.07A and the relatively short distance from Station No. 13 to the Project site, fire protection response would be considered adequate. Additionally, the National Fire Protection Association (NFPA) has published target response times for fire stations of 5 minutes, 20 seconds or less.[38] Although Station 13 has response times that exceed the NFPA target response times for fire stations, there are additional fire stations near the Project that would be available for dispatch.[39] LAFD Station 59 and LAFD stations are within 2 miles of the Project site. The incremental increase in employees and individuals that would be introduced to the Project site as a result of the Project would not substantially affect the provision of fire protection given the location of the Project site in a highly-urbanized area and the close proximity to existing fire stations. As such, implementation of the Project would not require new or physically altered LAFD facilities. Impacts would be less than significant.

### *ii. Police protection?*

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

The Project site is located within Reporting District 2079 of the Olympic division of the LAPD's West Bureau. The Olympic Community Police Station is located at 1130 S. Vermont, less than a 1-mile driving distance to the north side of the Project site.

38 *NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments* (2015).

39 Los Angeles Fire Department, "Find Your Station," http://www.lafd.org/fire_stations/find_your_station.

Implementation of the Project would result in an additional 66 employees with the future Project site thereby generating a potential increase in the number of service calls from the Project site. However, most of these employees would already live nearby, therefore not contributing to the overall population growth. As such, the overall increase in service population would not be substantial. Nonetheless, responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to rise as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, as a result of security lighting and other public safety features, any increase in demands on police services would be relatively low and would not necessitate the construction of a new police station. Impacts would be less than significant.

***iii. Schools?***

**Less than Significant with Impact.** A significant impact may occur if a project were to include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD).

The Project area is currently served by the following LAUSD public schools: Magnolia Avenue Elementary School, located at 1626 Orchard Avenue, which serves kindergarten through 5th grade students; Berendo Middle School, located at 1157 S Berendo Street which serves 6th through 8th grade students; and W Adams High, located at 1500 W Washington Boulevard, which serves 9th through 12th grade students. The hotel would introduce approximately 66 employees to the area. However, these employees would predominantly come from the exiting population of the City of Los of Angeles, therefore would not contributing to an overall population growth within the LAUSD service area. Therefore, the Project is not expected to generate demand for LAUSD school services. Impacts would be less than significant.

***iv. Parks?***

**Less than Significant Impact.** A significant impact could occur if the Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment. The Project site is located within a highly-urbanized area of the Pico Union neighborhood and has access to numerous parks and public recreation facilities within a 2-mile radius. The Project site would have increased visitors and employees. Visitors would be temporary users of the parks, and as noted above, there would an increase of approximately 66 employees to the Project site. In addition, the Project would include recreational amenities such as a pool and would offset demand on existing parks serving the area. However, most of these employees are expected to already live within the City of Los Angeles, therefore they would not

contribute to an overall increase in the population utilizing local and regional parks. Consequently, the Project would not result in a substantial change in the service demands on existing park facilities nor the need to construct new facilities to serve these employees. Impacts of the Project would be less than significant.

***v. Other public facilities?***

**Less than Significant Impact.** The determination of whether a project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project build-out 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 [LAPL]).

Within the City of Los Angeles, the LAPL provides library services at the Central Library, 7 regional branch libraries, 56 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The closest branch to the Project site is the Pico Union Branch Library, located at 1030 S. Alvarado Street, approximately 0.5 miles north of the Project site, though there are other branch locations nearby. The Project site would have increased visitors and employees. Visitors would be temporary, and as noted above, there would an increase of approximately 66 employees to the Project site. However, most of these employees would already live nearby, therefore not contributing to the overall population growth. Given the multiple branches serving the area, as well as the other library facilities, new or physically altered library facilities would not be needed to serve the Project. Impacts would be less than significant.

## 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 facility would occur or be accelerated?*

**Less than Significant Impact.** A significant impact could occur if a project includes substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. The determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The proposed Project would result in an increase of visitors and employees. Visitors would be temporary users of the recreational facilities, and as noted above, there would an increase of approximately 66 employees to the Project site. However, most of these employees would already live nearby, therefore not contributing to the overall population growth. Additionally, the Project includes on-site recreational amenities intended to serve some of the needs of the hotel guests. Notwithstanding the availability of on-site recreational amenities, it may be assumed that the future visitors and employees of the Project may utilize recreation and park facilities in the

surrounding area. There are several existing parks and recreation centers located within the surrounding area and larger regional facilities located further away. With the number of expected visitors and the on-site amenities it is not expected that the Project would substantially increase the use of existing neighborhood and regional parks or other recreational facilities to the extent that substantial physical deterioration of such facilities would result. Impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project would include recreational amenities such as a pool, the construction of which would not have an adverse physical effect on the environment. As such, impacts would be less than significant

# XVII. TRANSPORTATION

The following section summarizes and incorporates by reference information from the *Traffic Impact Study, 2250-2270 W Pico Boulevard Hotel Project,* dated February 17, 2017 (Traffic Study), prepared by Linscott, Law & Greenspan, Engineers for the Applicant and the review memorandum dated March 16, 2017 by LADOT, as contained in **Appendix D** of this Initial Study.

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

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

**Less than Significant Impact with Project Mitigation.**

## Operational Traffic

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

Seven study intersections were identified, in coordination with LADOT staff, for inclusion in the traffic analysis. The analyzed locations are shown in the Traffic Study and correspond to locations where potential traffic impacts from the Project are most likely to occur. The intersections identified for analysis are as follows:

1. Vermont Avenue / Pico Boulevard
2. Magnolia Avenue / Pico Boulevard
3. Magnolia Avenue / Venice Boulevard
4. Hoover Street / Olympic Boulevard
5. Hoover Street / Pico Boulevard
6. Hoover Street / Venice Boulevard
7. Alvarado Street / Pico Boulevard

## Estimated Trip Generation

Trip generation estimates for the Project were reviewed and approved by LADOT and were calculated using trip generation rates contained in the Institute of Transportation Engineers' *Trip Generation Manual,* 9th edition. **Table B.XVII-1 Trip Generation Estimates,** summarizes the trip generation estimates for the daily AM peak-hour and PM peak-hour periods, respectively. In addition to calculating the trip rates for the specific components of the proposed Project, credits and offsets were calculated. The existing uses on the Project site would be removed, thus future traffic conditions surrounding the Project site would not include trips associated with the existing uses of the Project site. In addition, due to its proximity to transit, some of the trips assumed in the Trip Generation manual would occur by transit rather than private vehicle. Finally, there would be some trips to the Project site that would be drawn from existing traffic passing the site and thus would not be considered new trips. Based on these factors, and as approved by LADOT, the trip calculation was adjusted accordingly. As shown in **Table B.XVII-1**, the Project would generate 1,021 weekday trips, including 66 morning peak-hour trips and 75 afternoon peak-hour trips.

## Project Impacts

### *Existing with Project Impacts*

Project traffic was added to existing traffic conditions and the potential for impacts evaluated. **Table B.XVII-2, Existing with Project Conditions—Intersection Level of Service AM/PM Peak Hours,** summarizes the level of service for the existing with Project conditions at the analyzed intersections for the AM and PM peak hours, respectively. Based on the City's guidelines, an impact could be significant if one of the following scenarios would occur: at an intersection with Level of Service C if the volume-to-capacity (V/C) ratio increased by.04 or

greater; at an intersection with Level of Service D if the volume-to-capacity (V/C) ratio increased by.02 or greater; or at an intersection with Level of Service E or F if the volume-to-capacity (V/C) ratio increased by.01 or greater. The analysis summarized in **Table-B.XVII-2** indicates that for the AM/PM peak hour, the addition of Project traffic would not cause an increase in V/C ratios above the threshold. Therefore, it is concluded that the Project would not cause any significant traffic impacts compared to existing conditions in either the AM or PM peak hours.

### *Future with Project Impacts*

**Table B.XVII-3, Future without and with Project Conditions—Intersection Level of Service AM/PM Peak Hours,** summarizes the results of the future with Project conditions intersections analysis during the weekday morning and afternoon peak hours. The future with Project conditions were compared to the future without Project conditions to assess the impacts of the Project as compared to the future environment without of the Project. In addition, potential net increases in average daily vehicle trips and peak-hour vehicle trips from the related projects were taken into consideration. Based on the City's significance criteria, the change in traffic flow generated by the Project when compared to conditions without the Project is not anticipated to result in a significant impact at any of the study intersections under future conditions.

**Table B.XVII-1**
**Trip Generation Estimates for Project**

| | | | | AM Peak-Hour Trips | | | PM Peak-Hour Trips | | |
|---|---|---|---|---|---|---|---|---|---|
| **Land Use (ITE Code)** | **Size** | **Units** | **Daily** | **In** | **Out** | **Total** | **In** | **Out** | **Total** |
| ***Proposed Project*** | | | | | | | | | |
| Hotel | 125 | rooms | 1,021 | 39 | 27 | 66 | 38 | 37 | 75 |
| Deduction for transit (5%) | | | (51) | (2) | (1) | (3) | (2) | (2) | (4) |
| *Project Subtotal* | | | 970 | 37 | 26 | 63 | 36 | 35 | 71 |
| ***Existing Uses*** | | | | | | | | | |
| Market (5%) | (9,627) | gsf | 984 | 20 | 13 | 33 | 46 | 45 | 91 |
| Deduction for transit (5%) | | | (49) | (1) | (1) | (2) | (2) | (2) | (4) |
| Deduction for pass-by (5%) | | | (374) | (8) | (5) | (13) | (18) | (17) | (35) |
| *Existing Subtotal* | | | 561 | 11 | 7 | 18 | 26 | 26 | 52 |
| **Total Net Project Trips** | | | **409** | **26** | **19** | **45** | **10** | **9** | **19** |

*Source: Traffic Impact Study, Linscott, Law & Greenspan, Engineers (February 17, 2017).*
*Note: gsf= gross square feet.*

**Table B.XVII-2**
**Existing with Project Conditions—**
**Intersection Level of Service AM/PM Peak Hours**

| No. | Intersection | Peak Hour | Existing 2017 | | Existing 2017 with Project | | Change in V/C | Significant Impact? |
|---|---|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS | | |
| 1 | Vermont Avenue/Pico Boulevard | AM | 0.703 | C | 0.707 | C | 0.004 | No |
| | | PM | 0.699 | B | 0.701 | C | 0.002 | No |
| 2 | Magnolia Avenue/Pico Boulevard | AM | 0.329 | A | 0.337 | A | 0.008 | No |
| | | PM | 0.472 | A | 0.476 | A | 0.004 | No |
| 3 | Magnolia Avenue/Venice Boulevard | AM | 0.473 | A | 0.473 | A | 0.000 | No |
| | | PM | 0.457 | A | 0.457 | A | 0.000 | No |
| 4 | Hoover Street/Olympic Boulevard | AM | 0.873 | D | 0.875 | D | 0.002 | No |
| | | PM | 0.834 | D | 0.834 | D | 0.000 | No |
| 5 | Hoover Street/Pico Boulevard | AM | 0.663 | B | 0.667 | B | 0.004 | No |
| | | PM | 0.728 | C | 0.729 | C | 0.001 | No |
| 6 | Hoover Street/Venice Boulevard | AM | 0.769 | C | 0.770 | C | 0.001 | No |
| | | PM | 0.813 | D | 0.814 | D | 0.001 | No |
| 7 | Alvarado Street/Pico Boulevard | AM | 0.592 | A | 0.594 | A | 0.002 | No |
| | | PM | 0.719 | C | 0.720 | C | 0.001 | No |

*Source: Linscott, Law & Greenspan, Engineers (February 17, 2017).*
*Note: LOS = level of service; V/C = volume to capacity.*

**Table B.XVII-3**
**Future without and with Project Conditions—**
**Intersection Level of Service AM/PM Peak Hours**

| No. | Intersection | Peak Hour | Future 2019 without Project | | Future 2019 with Project | | Change in V/C | Significant Impact? |
|---|---|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS | | |
| 1 | Vermont Avenue/Pico Boulevard | AM | 0.909 | E | 0.914 | E | 0.005 | No |
| | | PM | 0.977 | E | 0.979 | E | 0.002 | No |
| 2 | Magnolia Avenue/Pico Boulevard | AM | 0.493 | A | 0.504 | A | 0.011 | No |
| | | PM | 0.695 | B | 0.699 | B | 0.004 | No |
| 3 | Magnolia Avenue/Venice Boulevard | AM | 0.561 | A | 0.561 | A | 0.000 | No |
| | | PM | 0.574 | A | 0.575 | A | 0.001 | No |
| 4 | Hoover Street/Olympic Boulevard | AM | 1.036 | F | 1.038 | F | 0.002 | No |
| | | PM | 1.107 | F | 1.108 | F | 0.001 | No |
| 5 | Hoover Street/Pico Boulevard | AM | 0.832 | D | 0.835 | D | 0.003 | No |
| | | PM | 0.957 | E | 0.958 | E | 0.001 | No |
| 6 | Hoover Street/Venice Boulevard | AM | 1.003 | F | 1.004 | F | 0.001 | No |
| | | PM | 1.064 | F | 1.065 | F | 0.001 | No |
| 7 | Alvarado Street/Pico Boulevard | AM | 0.718 | C | 0.720 | C | 0.002 | No |
| | | PM | 0.895 | D | 0.896 | D | 0.001 | No |

*Note: Source: Linscott, Law & Greenspan, Engineers (February 17, 2017).*
*LOS = level of service; V/C = volume to capacity.*

## Construction Impacts

The Project would require the use of haul trucks during site clearing and excavation and the use of a variety of other construction vehicles throughout the construction of the Project. The demolition and site clearing phase has been estimated by the Project Applicant to require approximately 139 truck trips at its peak.[40] The Haul Route would utilize Pico Boulevard east to SR-110 or Hoover Street to Interstate 10. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The haul trips would occur outside of the peak hours. As stated above, the operation of the Project is expected to generate a net increase of 409 trips per day without resulting in a significant impact. The Project's peak construction trip traffic is estimated at approximately 139 trips per day.[41] Therefore, it is not anticipated that the construction trips would contribute to a significant increase in the overall congestion in the Project vicinity.

However, construction activity could result in disruption of sidewalks or travel lanes adjacent to the Project site. This could have an impact on pedestrian and vehicular safety as well as an impact on pedestrian activity at the nearby schools Therefore, impacts are potentially significant, and mitigation is necessary.

***Mitigation Measures:*** The incorporation of the following mitigation measure into the Project would reduce construction traffic impacts to a less than significant level.

**MM-TRANS-1: Work Area Traffic Management Plan**

- The Project Applicant shall submit a formal Work Area Traffic Control Plan for review and approval by the Department of Building and Safety prior to the issuance of any construction permits. This plan shall incorporate safety measures around the site to reduce the risk to pedestrian traffic near the work area. This plan shall identify traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. This plan shall include:
    - Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work

40 Based on CalEEMod output tables included in Appendix A of this Initial Study.

41 Derived from construction worker and vendor trip rates contained in *California Emissions Estimator Users Guide,* California Air Pollution Control Officers Association (July 2013), Appendix E, "Technical Source Documentation.".

space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the Project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- The applicant shall be limited to no more than two trucks at any given time within the site's staging area.
- There shall be no staging of hauling trucks on any streets adjacent to the project, unless specifically approved as a condition of an approved haul route.
- No hauling shall be done before 9 a.m. or after 3 p.m.
- Trucks shall be spaced so as to discourage a convoy effect.
- A minimum of two flag persons are required. One flag person is required at the entrance to the Project site and one flag person at the next intersection along the haul route.
- Truck crossing signs are required within 300 feet of the exit of the Project site in each direction.
- A log documenting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times.
- The applicant shall identify a construction manager and provide a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.

**MM-TRANS-2** **Public Services (Construction Activity Near Schools)**

- The developer and contractors shall maintain ongoing contact with administrator of Magnolia Avenue Elementary School, Berendo Middle School, and W Adams High. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- There shall be no staging, idling or parking on construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school during school hours.

**MM-TRANS-3** **Public Services (Schools affected by Haul Route)**

- Los Angeles Department of Building and Safety (LADBS) shall assign specific haul route hours of operation based upon local school hours of operation.
- Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the schools during periods when school is in session especially when students are arriving or departing from the campus.

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

**Less than Significant Impact.** The City is in the process of updating its travel demand model and transportation impact thresholds based on vehicle miles traveled (VMT), though the changes have not been formerly adopted.[1] Nonetheless, CEQA Guidelines 15064.3(b)(1) states that projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. The Project is located on a high-quality transit corridor. As such, impacts would be less than significant.

### *c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

**Less than Significant Impact.** Land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if access or other features were designed in such a way as to create hazard conditions. The Project would include new vehicular access driveways to the site from Arapahoe Street and alley south of Pico Boulevard east of Magnolia Avenue. In addition, the on-street parking opposite the proposed driveways would be reconfigured to accommodate the turning radius of delivery trucks entering and exiting the Project site for the commercial uses. These driveway modifications would be properly designed and constructed to ensure the safety of vehicular and pedestrian circulation in the Project area. Impacts would be less than significant.

### *d. Result in inadequate emergency access?*

**Less than Significant Impact.** A significant impact could occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve a project or adjacent uses.

As previously discussed, the Project site is located at 2250, 2260, 2268, and 2270 W Pico Boulevard and 1315 Arapahoe Street. Neither street is a selected disaster route as identified by the City's General Plan.[42] However, the Project site is located approximately 0.2 miles to the west of S. Alvarado Street, which is a selected disaster route.

Construction of the Project site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans.

As described previously, the Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of both the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would be less than significant.

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

## 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. | ☐ | ☐ | ☒ | ☐ |

***a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with 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 described in section **V(a.), Cultural Resources**, the Project site does not contain any features that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources; nor would the Project adversely affect any nearby resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. Therefore, potential impacts would be less than significant.

***b. 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.** Public Resources Code §21080.3.1 establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074. In compliance with the Code, the City has sent notices to Native American tribes that are known to be traditionally and culturally affiliated with the Project area and have requested to be notified of projects. A response was received from the Gabrieleno Band of Mission Indians – Kizh Nation ("the Gabrieleño ").

As described below, in order to comply with its obligations under the California Environmental Quality Act (CEQA), and specifically the requirements of Public Resources Code Sections 21074, 21080.3.1 and 21080.3.2, the City engaged in telephone and email consultations with the Gabrieleño, requested record searches of the Sacred Lands File ("SLF") and the California Historical Resources Information System ("CHRIS"), and carefully reviewed all information/documentation submitted by the Gabrieleño.

## Consultation

The consultation process with the Gabrieleño included exchanges of information via email and a telephone consultation with Andrew Salas and Matt Teutimez ("Gabrieleño Representatives"). During the telephone consultation on February 28, 2019, the Gabrieleño Representatives, made the following claims:

- The Project site is located within and around a sacred village, adjacent to sacred water courses, major traditional trade routes, and is within a sacred landscape.

Following this call, the Gabrieleño Representatives sent a follow-up email on March 1, 2019 with written explanation of the phone conversation and provided maps to supplement the information

provided over the phone. In addition, the Gabrieleño Representatives requested that the City add mitigation measures to the Project regarding:

- The need to hire a qualified on-site Native American monitor during construction-related ground disturbance activities;
- Unanticipated discovery of tribal cultural and archaeological resources;
- Unanticipated discovery of human remains and associated funerary objects;
- Resource assessment & continuation of work protocol
- Procedures for burials and funerary remains
- Treatment measures
- Requiring archaeological and Native American monitoring and excavation conform to professional standards, including a minimum of 10 years of experience for principal investigators.

Department of City Planning Staff made a good faith and reasonable effort to communicate with the Tribe, including requesting further information to substantiate their claim the Project site is located within and around a sacred village, adjacent to sacred water courses, major traditional trade routes, and is within a sacred landscape.

Planning Staff responded with an email on May 2, 2019 indicating that, based upon information the City had obtained thus far, the City does not believe there is a basis for requiring the Applicant to retain a monitor for all Project-related ground disturbing construction activity and requested that the Gabrieleño Representatives provide further evidence to support the information provided. On May 6, 2019, the Gabrieleño Representatives sent an email to Planning Staff that stated the Gabrieleno Tribal Government is not in agreement with the language within the mitigation measures provided by the City (standard mitigation measures and regulatory compliance measures related to inadvertent discovery). The Tribe did not provide additional information in this email as was requested by Planning Staff.

## Record Searches

Independent of the City's consultations with the Gabrieleño, the City requested record searches be conducted of the SLF and the CHRIS databases.[43] Staff also researched whether the Project

43 See Appendix _E.

site is within or in the vicinity of any listed sites in the California Register of Historic Resources or National Register of Historic Places. Neither the SLF nor CHRIS record searches identify the Project site as containing tribal cultural resources or provide any information that subsurface artifacts potentially exist on site or in the project vicinity that may qualify as tribal cultural resources.

## Analysis

The City carefully considered the information provided by the Gabrieleño oral history presentation and accompanying maps in support of their claim that this project has the potential to impact tribal cultural resources, and the tribe's request for the City to require its proposed mitigation measures to mitigate those potential impacts. During its review, Planning staff evaluated the relevance and credibility of the submitted information alleged to be related to the Project site, determined the geographic distance between any stated tribal cultural resource and the Project site and evaluated the truthfulness, qualifications and integrity of any facts offered by the provided information sources and references. The City has concluded that there is no substantial evidence to support a fair argument that this project has any potential direct, and reasonably foreseeable indirect impacts on any known tribal cultural resources.

Pursuant to Public Resources Code Section 21074(a) "Tribal cultural resources" are either of the following:

> (1) Sites, features, places, cultural landscapes[44], sacred places, and objects with cultural value to a California Native American tribe that are either of the following: (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources; or (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
>
> (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The Gabrieleño submitted several maps that depicted the proximity of the Project sit to (1) historic rail lines, (2) waterways; (3) overland trade routes, and a (4) historic zanja (water ditch used for

44 Pursuant to to Public Resources Code Section 21074(b), a cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

irrigation) to correspond to the oral history which was provided during the phone consultation with the tribe. The maps do not contain titles but are referenced by the Gabrieleño within the body of the email sent to Planning staff on March 1, 2019. These maps are discussed below and included in **Appendix E**.

*Historic Rail Lines*

The Gabrieleño Representatives provided a digital image of an 1989 Historical Map with a Google Earth overlay. This image depicts the project's proximity to a railroad that was roughly aligned with what is currently Venice Boulevard. According to the Gabrieleño in their oral history presentation, all railroads were placed on top of the tribe's traditional trade routes due to the first railroad planners choosing paths that already existed, which were the traditional trade routes that were flattened by human travel over thousands of years. The tribe did not present any further evidence to support their claim that the specific rail lines shown on the map in Exhibit E were the location of their historic trade routes, nor that there was any specific connection to the subject site. In the oral history presented by the Tribe, it was discussed that people using the trade routes would leave the route for various purposes, however, the Tribe's claims were not supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. Furthermore, research provided to the City by the applicant indicated that this rail line was part of the Pacific Electric trolley system constructed along modern road rights-of-way rather than referencing historic routes.

*Waterways*

The Gabrieleño Representatives provided a digital image of a 1901 Historical Map with Google Earth overlay. This map indicates the hydrography or waterways that existed in the Project area. According to the Gabrieleño in their oral history presentation, along these watercourses and water bodies occurred seasonal or permanent hamlets, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites of the tribe's ancestors, and larger water bodies were high attractants for human activity and the banks and shores of these water bodies have a higher than average potential for encountering Tribal Cultural Resources of artifacts and human remains during ground disturbing activities.

The map presented by the Tribe does indicate waterways, however, per the definition of a Tribal Cultural Resource "A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape." The waterways referenced by the Tribe are not geographically defined on the map in terms of the size and the scope of the landscape. The largest waterway near the Project

area is the Los Angeles River which is approximately three miles from the Project area. Most villages in the Los Angeles basin were established near major hydrological resources and the ranchos were established along similar proximity to natural resources. The Project area is located between ranchos in what was likely a much drier area than the surrounding vicinity. The map provided has no labels or clearly marked identifiable features, and does not provide enough detail to determine distance from the Project site. Therefore, the Tribe's claims were not supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

*Overland Trade Routes*

The Gabrieleño Representatives provided a digital image of a 1938 Map with Google Earth overlay. This map shows the Project's proximity to additional overland trade routes. According to the Gabrieleño in their oral history presentation, trade routes were heavily used by the tribe for movement of trade items, visiting of family, going to ceremony, accessing recreation areas, and accessing foraging areas. Within and around these routes contained seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and often still contain isolated burials and cremations from people who died along the trail. These isolated burials are not associated with a village community burial site or ceremonial burial site, rather the location is simply where the person died and was buried where they died. Therefore, isolated burials are more concentrated and likely to occur in proximity to the trade routes, especially the major trade routes.

The map presented by the Tribe indicates proximity to additional overland trade routes, however, per the definition of a Tribal Cultural Resource "A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape." The trade routes referenced by the Tribe are not geographically defined on the map in terms of the size and the scope of the landscape. Therefore, the Tribe's claims were not supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

*Zanja*

The Gabrieleño Representatives provided a digital image of 1884 Historic Map with a Google Map overlay. According to the Gabrieleño in their oral history presentation, these maps indicate the project location's proximity to a historic zanja or water ditch that the Tribe created in the late 1700's for the Spanish to grow crops and feed water to the people of the pueblo de Los Angeles. Artifacts made of stone such as mano's, metate's, grinders, pounders, etc. were utilized and

placed inside these zanjas as construction material for the ditches. However, the maps show the zanja terminating at Hoover Avenue, southeast of the Project site, and the Historic Map 1884 does not provide enough detail to determine distance from the Project site. The Tribe has not presented any additional evidence that the zanja was located on the Project site. Therefore, the Tribe's claims were not supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. Sacred Village

In its conclusion, the email from the Gabrieleño Representatives stated that the Project site is located within and around a sacred village. However, no further information was provided to identify where or what village is referenced. Research conducted for the City did not identify any known village site in close proximity to the Project. The closest mapped villages include Geveronga, Wenot, and Yanga located near downtown Los Angeles, approximately two miles east of the Project area. Therefore, the Tribe's claims were not supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

## Conclusion

Planning staff determined that the lack of details on the maps were insufficient to determine if any tribal cultural resource existed on the Project site or within a ½ mile proximity of the Project site. For some of the submitted documentation, no actual information source about the publisher or author was provided. Therefore, the submitted documentation is insufficient to support a claim that the Project site should be treated as a tribal cultural resource. For these reasons, Planning staff determined this information was not credible to support the identification of a tribal cultural resource as defined by Public Resources Code Section 21704.

In conclusion, City staff does not find the information provided by the Gabrieleño credible based on the information submitted into the administrative record, historical record searches regarding the potential impact to any known tribal cultural resource. The City has determined the Proposed Project will have no potential direct, and reasonably foreseeable indirect, impacts on any known tribal cultural resources.

However, in the unlikely event that tribal cultural resources are inadvertently discovered during the excavation and grading of the Project site, the City will include the following Condition of Approval as part of the recommended project approvals:

- Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling,

quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the Project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; (2) and the Department of City Planning at (213) 978-1454.

- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.

- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

Furthermore, the following Regulatory Compliance Measures are implemented for all projects citywide:

- Regulatory Compliance Measure CR-4 (Human Remains): If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

    - Stop immediately and contact:

      Los Angeles 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. If the owner does not accept the descendant's

recommendations, the owner or the descendent may request mediation by the NAHC.

- Regulatory Compliance Measure RC-CR-2 (Archaeological): If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Modified Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

  Distinctive features, finishes, and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.

  Deteriorated historic features shall be repaired rather than replaced. Where the severity if deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

  Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

  Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

  New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

  New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

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

## XIX. UTILITIES AND SERVICE SYSTEMS

| Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| b. Have sufficient water supplies available to serve the project and 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 is 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 statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

### *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.** A significant impact could occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project site would be exceeded. Water is provided by the Los Angeles Department of Water and Power (LADWP); the Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area.

LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs

within the City, and eight storage reservoirs along the Los Angeles Aqueducts.[45] Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 362 mgd as averaged over calendar year 2013 and operates at approximately 60 percent capacity. Therefore, the LAAFP has a remaining capacity of approximately 238 mgd, depending on the season.[46]

The Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area. Sewage from the Project site is conveyed via sewer infrastructure to the HTP. The HTP treats an average daily flow of 362 mgd and has the capacity to treat 450 mgd.[47] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.

The Project site is in a developed, urbanized portion of Los Angeles that is served by existing water and sewer mains. As shown in **Table B.XIX-1 Estimated Water Demand** below, it is estimated that the Project would have a daily water demand of 18,449 gallons or an annual demand of 20.66 acre-feet. Water conservation design features are likely to reduce this estimate. Water conservation design features are likely to reduce this estimate. Given the remaining capacity of the LAAFP, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building Code requirements that would further reduce water and wastewater flow. Impacts on water treatment facilities would be less than significant.

The Project site is in a developed portion of Los Angeles that is currently served by stormwater infrastructure. In addition, the Project would be required to demonstrate compliance with the Los Angeles Low Impact Development (LID) Ordinance standards and retain or treat the first three-quarter inch of rainfall in a 24-hour period. Impacts would be less than significant.

As shown in **Table B.XIX-2 Estimated Sewage Generation** below, it is estimated that the Project would generate 14,759 gpd of wastewater. Given the available capacity of the HTP, the Project would generate 0.02 percent of the remaining capacity and would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Impacts on wastewater treatment facilities would be less than significant.

45 Los Angeles Department of Water and Power, *Infrastructure and Reliability* (2015).
46 Los Angeles Department of Water and Power, *Urban Water Management Plan* (2016)
47 City of Los Angeles Department of Public Works, Bureau of Sanitation, Wastewater *System Fact Sheet* (2014)

**Table B.XIX-1**
**Estimated Water Demand**

| Land Use | Quantity | Demand Factor (gpd/unit)[a] | Daily Demand (gpd) | Annual Demand (afy) |
|---|---|---|---|---|
| Hotel | 125 rooms | 150 gpd/room | 18,750 gpd | 21.00 |
| *Existing Use -Market* | *9,627 sf* | *31.25/1,000 gsf* | *301 gpd* | *0.34* |
| **Total:** | | | **18,449 gpd** | **20.66** |

*Note: afy = acre-feet per year; gpd = gallons per day; gsf = gross square feet; sf = square feet.*
[a] *125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.*

**Table B.XIX-2**
**Estimated Sewage Generation**

| Land Use | Quantity | Factor (gpd/unit)[a] | Daily Generation (gpd) |
|---|---|---|---|
| Hotel | 125 rooms | 120 gpd/room | 15,000 gpd |
| *Existing Use -Market* | *9,627 sf* | *25/1,000 gsf* | *241 gpd* |
| **Total:** | | | **14,759 gpd** |

*Note: afy = acre-feet per year; gpd = gallons per day; gsf = gross square feet; sf = square feet.*
[a] *Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.*

### *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 would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project completion; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

According to the City's 2015 Urban Water Management Plan (UWMP), the City's projected demand for water, during a single season would be 513,540 acre-feet per year (afy) for 2015 and

611,800 afy for 2020.[48] The *UWMP* projects adequate water supplies through 2040. The net Project demand of 20.66 afy would be approximately 0.004 percent of the City of Los Angeles available capacity during a single dry year. As such, it is expected that LADWP has sufficient water supplies available to serve the Project.[49] Furthermore, as previously stated, the Project Applicant shall adhere to current standards including the Green Building Code that would reduce demand on local water supplies. Impacts would be less than significant.

### *c. Result in a determination by the wastewater treatment provider which serves or may serve the project that is has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**Less than Significant Impact.** A project would normally have a significant wastewater impact if (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the *Wastewater Facilities Plan* or *General Plan* and its elements. As stated above, the Hyperion Treatment Plant is expected to have capacity to serve the Project which would generate 0.02 percent of its remaining capacity. As such, impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling

48 City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2016).

49 City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2016).

Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Chiquita Canyon Landfill and the Manning Pit Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Chiquita Canyon Landfill currently has a remaining capacity of 758,146 tons.[50] The Manning Pit Landfill has a remaining capacity of 540,000 tons.[51] Thus, the Chiquita Canyon Landfill and Manning Pit Landfill combined have a remaining permitted capacity of approximately 1.3 million tons. The Chiquita Canyon Landfill has an estimated remaining life of 4 years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy).

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be removed from the Project site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility. As shown in **Table B.XIX-3, Expected Operational Solid Waste Generation,** the Project's net generation during the life of the Project would be a decrease of 50 pounds per day from existing uses.

**Table B.XIX-3**
**Expected Operational Solid Waste Generation**

| Type of Use | Size | Waste Generation Rate[a] (lb/unit/day) | Total Solid Waste Generated (lb/day) |
|---|---|---|---|
| Hotel Rooms | 125 rooms | 2 lb/room/day | 250 lb/day |
| *Existing - Market* | *9,627 sf.* | *3.12 lb/100 sf/day* | *300 lb/day* |
| **Total Project Waste Generation** | | | ***-50* lb/day** |

*Notes: du = dwelling unit; lb = pounds; sf = square feet.*
*a CalRecycle, Estimated Solid Waste Generation Rates (2016). Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

50 County of Los Angeles Department of Public Works, *Los Angeles Countywide Integrated Waste Management Plan, 2015 Annual Report* (December 2016).

51 County of Los Angeles Department of Public Works, http://www.ladpw.org (February 2014).

This estimate is conservative because it does not factor in any recycling or waste diversion programs. The amount of solid waste generated by the Project is within the available capacities at area landfills. Furthermore, the Project Applicant shall be required to comply with the following regulatory measures regarding recycling. As such, impacts would be less than significant.

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

**Less than Significant Impact.** A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste during both construction and operation that is typical of a hotel with subterranean parking and would comply with all federal, State, and local statutes and regulations regarding proper disposal. As such, impacts would be less than significant.

## XX. WILDFIRES

| Would the project: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations 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. 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? | ☐ | ☐ | ☒ | ☐ |

***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?***

The Project site is located in a developed and urbanized area of the City that does not contain wildlands or high fire hazard terrain or vegetation. The Project site is not located in or near a State responsibility area or on lands classified as very high fire hazard severity zones. As such, none of the above thresholds would be applicable to the proposed Project. No further analysis is required. As such, no impacts would occur.

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

***a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

**Less than Significant Impact**. A significant impact could occur only if the Project would have an identified potentially significant impact for any of the issues cited above: quality of the environment; habitat or populations of fish or wildlife species; plant or animal communities; rare or endangered plant or animal; or important examples of the major periods of California history or prehistory. As indicated by the analysis in this Initial Study, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. Nor would the Project potentially affect

important historic or prehistoric resources. Construction related impacts were identified that would be less than significant with mitigation measures incorporated. Therefore, impacts on the quality of the environment would be less than significant.

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

**Less than Significant Impact.** Cumulative impacts can occur when the impacts of two or more separate projects are considerable when considered together. In the preceding topical analyses, cumulative impacts have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the South Coast Air Basin and the evaluation of traffic impacts considered the cumulative effect of other proposed Projects in the immediate vicinity. Through the analyses, no significant cumulative impacts were identified for the Project. Impacts would be considered less than significant.

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

**Less than Significant Impact with Mitigation Incorporated.** As discussed in the preceding sections, the Project could result in potentially significant impacts during construction. Mitigation Measures listed in **Sections VI Geology and Soils, XII Noise**, and **XVI Transportation** have been identified to address these impacts.

***Mitigation Measures:*** Applicable mitigation measures have been identified in this Initial Study. With incorporation of these measures, impacts of the Project would be less than significant.