CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		**COUNCIL DISTRICT:** 1
PROJECT TITLE: 7th & Lucas Mixed-Use Project	**ENVIRONMENTAL CASE:** ENV-2015-2800-MND	**CASE NO:** DIR-2015-2799-SPP-DB

PROJECT LOCATION: 1135, 1145, and 1147 W. 7th Street.

PROJECT DESCRIPTION:

The Project would involve the demolition of an existing 2-story hotel, warehouse, and related surface parking and the construction of a new 26-story, mixed-use development. A total of 241 dwelling units, inclusive of up to 20 dwelling units set aside for Very Low Income households, and 7,291 square feet of retail and commercial space would be constructed on the Project Site. The proposed Floor Area Ratio (FAR) would be 8.0:1, and the mixed-use structure would have a maximum height of height of 265 feet. Parking on the Project Site would be provided within a 6-level parking structure that would include 1 level of subterranean parking. A total of 342 parking spaces would be provided within the parking structure for both the residential and commercial and retail uses on the Project Site.

The Project Site is located at the northeast corner of 7th Street and Lucas Avenue and is currently zoned C4(CW)-U/6 (Central City West Specific Plan Zone) and designated as Regional Center Commercial. The Project Applicant would request approvals for a Specific Plan (Central City West) Project Permit Compliance (Los Angeles Municipal Code [LAMC] Section 11.5.7) and a Density Bonus/Affordable Housing Incentive Determination (LAMC Section 12.22.A.25). Furthermore, the Project Applicant would request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul routes, and building and tenant improvements for each site.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Pangea Development

Attn: Henry Xia

225 South Lake Avenue, Suite 300

Pasadena, California 91101

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 significance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED		
Any written comments received during the public review period are 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 Mindy Nguyen	**TITLE** City Planner	**TELEPHONE NUMBER** (213) 978-1241
ADDRESS 200 North Spring Street, Room 621 Los Angeles, CA 90012	**SIGNATURE (Official)**	**DATE** July 5, 2016

CITY OF LOS ANGELES
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CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (*CEQA Guidelines* Section 15063)

LEAD CITY AGENCY:	**COUNCIL DISTRICT:**	**DATE:**
City of Los Angeles	1	
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE:	**RELATED CASES:**	
ENV-2015-2800-EAF	DIR-2015-2799-SPP-DB	
PREVIOUS ACTIONS CASE NO.	☐ DOES have significant changes from previous actions.	
N/A	☐ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

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PROJECT DESCRIPTION: See above and supporting exhibits and tables in the attached Initial Study prepared by Meridian Consultants, dated April 2016.

ENVIRONMENTAL SETTING:

The 7th & Lucas Mixed-Use Project is located on an approximately 0.77-acre site at 1135, 1145, and 1147 7th Street, Los Angeles, California ("Project Site"). The Project Site is located in the Wilshire Corridor District of the Central City West Specific Plan ("Specific Plan"), which in turn is located within the boundaries of the Westlake Community Plan area. Additionally, the Project Site is also located within the Los Angeles State Enterprise Zone and the Central City Revitalization Zone.

Further details of the existing Project Site and surrounding area are provided in the Initial Study (IS) prepared by Meridian Consultants, dated April 2016.

PROJECT LOCATION: 1135, 1145, and 1147 West 7th Street, Los Angeles, CA

COMMUNITY PLAN AREA: Central City **STATUS:** ☐ Preliminary ☒ Does Conform to Plan ☐ Proposed ☐ Does NOT Conform to Plan ☒ ADOPTED in 2003		**AREA PLANNING COMMISSION:** Westlake	**CERTIFIED NEIGHBORHOOD COUNCIL:** Downtown Los Angeles
EXISTING ZONING: C4(CW)-U/6	**MAXIMUM DENSITY ZONING:** 6:1	**LA River Adjacent:** No	
GENERAL PLAN LAND USE: Regional Center Commercial	**MAXIMUM DENSITY PLAN:** 6:1	**PROPOSED PROJECT DENSITY:** 8:1 FAR (with 35% Density Bonus)	

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately

analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature	City Planner Title	(213) 978-1241 Phone

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross-referenced).
5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or

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

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ **AESTHETICS** ☐ **AGRICULTURE AND FOREST RESOURCES** ☒ **AIR QUALITY** ☒ **BIOLOGICAL RESOURCES** ☐ **CULTURAL RESOURCES** ☒ **GEOLOGY AND SOILS**	☒ **GREENHOUSE GAS EMISSIONS** ☒ **HAZARDS AND HAZARDOUS MATERIALS** ☐ **HYDROLOGY AND WATER QUALITY** ☐ **LAND USE AND PLANNING** ☐ **MINERAL RESOURCES** ☒ **NOISE**	☐ **POPULATION AND HOUSING** ☒ **PUBLIC SERVICES** ☐ **RECREATION** ☒ **TRANSPORTATION AND TRAFFIC** ☐ **UTILITIES** ☒ **MANDATORY FINDINGS OF SIGNIFICANCE**

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

PROPONENT NAME: Pangea Development (Attn: Henry Xia)

APPLICANT ADDRESS: 225 South Lake Avenue, Suite 300; Pasadena, California 91101

AGENCY REQUIRING CHECKLIST: City of Los Angeles Department of City Planning **DATE SUBMITTED:** 07/30/2015

PROPOSAL NAME (If Applicable): 7th and Lucas Mixed-Use Project

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
4.1. AESTHETICS					
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, or other locally recognized desirable aesthetic natural feature within a city-designated 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?	☐	☐	☒	☐
4.2. AGRICULTURE AND FOREST RESOURCES					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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 1220(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?	☐	☐	☐	☒
4.3 AIR QUALITY					
a.	Conflict with or obstruct implementation of the SCAQMD or congestion management plan?	☐	☐	☒	☐
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☒	☐	☐
4.4 BIOLOGICAL RESOURCES					
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by The California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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 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?	☐	☐	☐	☒
4.5 CULTURAL RESOURCES					
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	☐	☐	☒	☐
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	☐	☐	☒	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
4.6 GEOLOGY AND SOILS					
Would the project:					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault? Refer to division of mines and geology special publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
4.7 GREENHOUSE GAS EMISSIONS					
Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
4.8 HAZARDS AND HAZARDOUS MATERIALS					
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
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?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 it create a significant hazard to the public or the	☐	☐	☒	☐
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.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
4.9 HYDROLOGY AND WATER QUALITY					
Would the project:					
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?	☐	☐	☐	☒

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood plain as mapped on federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
4.10 LAND USE AND PLANNING					
Would the project:					
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
4.11 MINERAL RESOURCES					
Would the project:					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
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?	☐	☐	☐	☒
4.12 NOISE					
Would the project:					
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b.	Exposure of people 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?	☐	☒	☐	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
4.13 POPULATION AND HOUSING					
Would the project:					
a.	Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
4.14 PUBLIC SERVICES					
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?	☐	☒	☐	☐
ii.	Police protection?	☐	☒	☐	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☒	☐
4.15 RECREATION					
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
4.16 TRANSPORTATION AND TRAFFIC					
Would the project:					
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	☐	☒	☐	☐
b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e.	Result in inadequate emergency access?	☐	☒	☐	☐
f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
4.17 UTILITIES & SERVICE SYSTEMS					
Would the project:					
a.	Exceed wastewater treatment requirements of the applicable regional water quality control board?	☐	☐	☐	☒
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
4.18 MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self---sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☒	☐	☐
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (ATTACH ADDITIONAL SHEETS IF NECESSARY)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including, but not limited to, reference materials indicated above, field investigation of the Project Site, and other reliable reference materials known at the time.

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

The Project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2015-2800-MND** and the associated case, **DIR-2015-2799-SPP-DB**. Finally, based on the fact that these impacts can be feasibly mitigated to a less-than-significant level, and based on the findings and thresholds for Mandatory Findings of Significance as described in State *CEQA Guidelines*, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat
- Cause a fish or wildlife habitat to drop below self-sustaining levels
- Threaten to eliminate a plant or animal community
- Reduce number, or restrict range of a rare, threatened, or endangered species
- Eliminate important examples of major periods of California history or prehistory
- Achieve short-term goals to the disadvantage of long-term goals

- Result in environmental effects that are individually limited but cumulatively considerable
- Result in environmental effects that will cause substantial adverse effects on human beings

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced previously and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers, visit the City's website at http://www.lacity.org; City Planning and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/; or EIR Unit, City Hall, 200 N Spring Street, Room 763; or City's main website under the heading "Navigate LA."

PREPARED BY:	**TITLE:**	**TELEPHONE NO.:**	**DATE:**
Mindy Nguyen	City Planner	(213) 978-1241	

Environmental Analysis Explanation Table

	Impact	Explanation	Mitigation Measures
4.1 AESTHETICS			
a.	Less than Significant Impact	See environmental analysis provided in the Initial Study (IS) prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.2 AGRICULTURAL RESOURCES			
a.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
e.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.3 AIR QUALITY			
a.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
d.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
e.	Less than Significant Impact with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**III-60, III-70**
	4.4 BIOLOGICAL RESOURCES		
a.	Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**IV-20**
b.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
e.	Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**IV-80, IV-90**
f.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
	4.5 CULTURAL RESOURCES		
a.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
	4.6 GEOLOGY AND SOILS		
a.i.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
a.ii.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
a.iii.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
a.iv.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**V-20, VI-40**
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required
d.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required
e.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.7 GREENHOUSE GAS EMISSIONS			
a.	Less than Significant Impact with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**VII-10**
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.8 HAZARDS AND HAZARDOUS MATERIALS			
a.	Less than Significant Impact with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**VIII-50**
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
e.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
f.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.

	Impact	Explanation	Mitigation Measures
g.	Less than Significant Impact with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	**VIII-80**
h.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.9 HYDROLOGY AND WATER QUALITY			
a.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
c.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
d.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
e.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
f.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
g.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
h.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
i.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
j.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
4.10 LAND USE AND PLANNING			
a.	No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required.
b.	Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated April 2016.	No mitigation measures are required

1.0 PROJECT INFORMATION

Project Title: **7th & Lucas Mixed-Use Project**

Project Location: **1135, 1145, and 1147 West 7th Street**

Project Applicant: Pangea Development
Attn: Henry Xia
225 South Lake Avenue, Suite 300
Pasadena, California 91101

Lead Agency: City of Los Angeles
Department of City Planning
200 North Spring Street, Room 621
Los Angeles, CA 90012

PROJECT SUMMARY

The 7th & Lucas Mixed-Use Project is located on an approximately 0.77-acre site at 1135, 1145, and 1147 7th Street, Los Angeles, California ("Project Site"). The Project Site is located in the Wilshire Corridor District of the Central City West Specific Plan ("Specific Plan"), which in turn is located within the boundaries of the Westlake Community Plan area. Additionally, the Project Site is also located within the Los Angeles State Enterprise Zone and the Central City Revitalization Zone.

The Project involves the demolition of an existing two-story hotel, warehouse, and related surface parking and the construction of a new 26-story, mixed-use development. A total of 241 dwelling units, inclusive of up to 20 dwelling units set aside for Very Low Income Households, and 7,291 square feet of retail and commercial space would be constructed on the Project Site. The proposed Floor Area Ratio (FAR) would be 8.0:1, and the mixed-use structure would have a maximum height of 278 feet. Parking on the Project Site would be provided within a six-level parking structure that would include one level of subterranean parking. A total of 341 parking spaces would be provided within the parking structure for both the residential and commercial and retail uses on the Project Site.

The Project Site is located at the northeast corner of 7th Street and Lucas Avenue and is currently zoned C4(CW)-U/6 (Central City West Specific Plan Zone) and designated as Regional Center Commercial. The Project Applicant requests approvals for a Specific Plan (Central City West)

Project Permit Compliance (Los Angeles Municipal Code [LAMC] Section 11.5.7) and a Density Bonus/Affordable Housing Incentive Determination (LAMC Section 12.22.A.25). Furthermore, the Project Applicant would request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities, including but not limited to the following: demolition, excavation, shoring, grading, foundation, haul routes, and building and tenant improvements for each site.

ORGANIZATION OF INITIAL STUDY ANALYSIS

This Initial Study is organized into six sections as follows:

Section 1.0, Introduction, provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

Section 2.0, Existing Conditions, describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.

Section 3.0, Project Description, provides a detailed description of the Project, including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

Section 4.0, Environmental Analysis, this section includes an analysis for each resource topic and identifies impacts of implementing the Project. It also identifies mitigation measures, if applicable.

Section 5.0, References, identifies all printed references and individuals cited in this Initial Study.

Section 6.0, List of Preparers, identifies the individuals who prepared this report and their areas of technical specialty.

In addition, the following **Appendices** present data supporting the analysis or contents of this Initial Study.

- **Appendix A**, Air Quality and Greenhouse Gas Modeling Data
- **Appendix B**, Noise Background and Modeling Data
- **Appendix C**, *Traffic Study*
- **Appendix D,** *Geotechnical Investigation*

This Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as the Lead Agency to determine whether an Environmental Impact Report (EIR) or a Negative Declaration (ND) or Mitigated Negative Declaration (MND) must be prepared for a Project. A MND is prepared for a project 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 ND 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.

Implementation of the Project could cause some potentially significant impacts on the environment, but as shown in the environmental analysis contained in this Initial Study, all of the Project's potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that a MND shall be prepared for the Project.

2.0 EXISTING CONDITIONS

PROJECT LOCATION

The Project is located within the South Subarea, Wilshire Corridor District of the Central City West Specific Plan within the boundaries of the Westlake Community Plan area. The Central City West Specific Plan is generally bound by the Harbor/Pasadena Freeway (Interstate [I]-110/State Route [SR] 110) on the east, Hollywood Freeway (US Route 101/Hollywood Freeway (US 101) to the north, Olympic Boulevard to south, and Glendale Boulevard, Witmer Street, and Union Avenue on the west. The location of the Project Site is shown in **Figure 2.0-1, Project Location Map.**

The Project Site includes approximately 33,425 square feet (0.77 acres) of lot area, with surrounding uses consisting of various commercial and multifamily residential. The current addresses for the Project Site, Assessor's Parcel Numbers (APNs), and lot areas are summarized in **Table 2.0-1, Project Site Summary.**

Table 2.0-1
Project Site Summary

Property Address	APNs	Lot Area (sq. ft.)[a]
1135 7th Street	5143021016	17,983
1145 and 1147 7th Street	5143021007	15,442
Total Site Area		33,425

Source: City of Los Angeles, Department of City Planning. Zoning Information and Map Access System (ZIMAS) Database, Web GIS (2015). zimas.lacity.org.
Note: sq. ft. = square feet.
[a] *Due to rounding and slight measurement differences, the lot area according to ZIMAS does not exactly match the lot area per architectural plans. Additionally, the square footage of the alley area dedication is not accounted for in ZIMAS.*

REGIONAL AND LOCAL ACCESS

Regional Access

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

Local Street Access

Local street access is provided by a grid roadway system surrounding the Project Site and surrounding area. Seventh Street, which borders the Project Site to the south, runs diagonally northwest–southeast through the local streets and provides one travel lane in each direction. It is classified as an Avenue II. Lucas Avenue, which borders the Project Site to west, is a classified Avenue II that runs north–south, with one travel lane in each direction. Wilshire Boulevard, located north of the Project Site, is a classified Avenue II running east–west that provides two travel lanes in each direction. Garland Avenue, located west of the Project Site and perpendicular to 7th Street, runs in a north–south direction and provides one travel lane in each direction. It is classified as a Collector Street. 8th Street, located south of the Project Site and parallel to 7th Street, runs east–west and is a classified Avenue II that provides one eastbound and two westbound travel lanes. Bixel Street, located east of the Project Site, runs north–south and varies between one and two travel lanes in each direction. It is classified as an Avenue I.

Public Transit

The Project Site is well served by regional and local public transit, as well as by other commuter and passenger rail services. The Los Angeles County Metropolitan Transportation Authority (MTA) and the Los Angeles Department of Transportation (LADOT) provide access to and from the Project area. Several MTA bus lines (20, 66, 51/52/352, 481, and 487/489) run within the Project area along Wilshire Boulevard, 7th Street, and 8th Street.[1] LADOT operates a DASH bus route on 7th Street, east of the Project Site, and Commuter Express routes near the intersection of 7th Street and Figueroa Street. Additionally, the MTA's 7th Street/Metro Center Station, located approximately 0.40 miles east of the Project Site, is served by the light-rail Blue and Expo Lines, heavy-rail Red and Purple Lines, and the bus rapid transit Silver Line.

1 Metro website. Maps & Timetables. http://www.metro.net/riding/maps/. Accessed: September 2015.

LAND USE AND ZONING DESIGNATIONS

Westlake Community Plan

The Project Site is located within the Westlake Community Plan area of the City of Los Angeles. More specifically, the Project Site is located within the Central City West Specific Plan, which aims to balance high intensity commercial and residential uses within Downtown Los Angeles. The Community Plan notes that the Central City Specific Plan Area is a major opportunity development site to provide for the generation of new jobs to improve the economic and physical condition of the area. The Westlake Community Plan designates the Project Site as Regional Center Commercial.[2]

Central City West Specific Plan

The Project Site is located in the Wilshire Corridor District of the Central City West Specific Plan, also known as the South Subarea, which makes up the southern portion of the Specific Plan, and is bound by 7th Street to the south, the SR 110 freeway to the east, Union Avenue to the west, and 6th Street to the north. The Specific Plan was adopted to implement the goals and policies of the Westlake Community Plan and the Silver Lake–Echo Park–Elysian Valley Community Plan.[3] The Specific Plan was also intended to regulate all development, including use, location, height, and density, to ensure compatibility of uses, and to provide for the consideration of transportation of public facilities. Additionally, the Specific Plan identifies the need to ensure that new commercial, industrial, and mixed-use projects contribute to the affordable housing stock through payment of a Housing Linkage Fee and/or the construction of affordable housing within the Specific Plan area. The Project Site is designated as Regional Center Commercial and zoned C4(CW)-U/6, which pursuant to Section 6.F.7 of the Central City West Specific Plan, is subject to the use and area regulations of Section 12.16 of the LAMC.

Los Angeles Municipal Code

Consistent with the Central City West Specific Plan, the Project Site is designated as Regional Center Commercial and zoned C4(CW)-U/6.[4] The C4 Limited Commercial Zone permits commercial uses and residential uses allowed within the R4 Zone with a minimum lot area of 400

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2 City of Los Angeles Department of City Planning, Westlake Community Plan (1993).
3 City of Los Angeles Department of City Planning, Central City West Specific Plan (2009).
4 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org.

square feet per dwelling unit. Pursuant to LAMC Section 12.22.A.18.(a), however, any lot within the C Zone that is located in an area designated on an adopted Community Plan as "Regional Center" or "Regional Commercial" may be permitted R5 uses, and allows a minimum lot area of 200 square feet per dwelling unit. The "U" designation limits buildings and structures to maximum heights of 1,218 feet above mean sea level (amsl).[5] The "6" signifies a maximum FAR of 6.0:1.[6] However, pursuant to LAMC Section 12.22.A.25(f)(4) an Affordable Housing Development Project is permitted a percentage increase in the allowable FAR equal to the percentage of density bonus that the Housing Development Project is eligible for, up to a maximum of 35 percent. Additionally, the Project Site is also located within the Los Angeles State Enterprise Zone and the Central City Revitalization Zone.

EXISTING CONDITIONS

The Project Site can be accessed from 7th Street and Lucas Avenue via an alley. Landscaping on the Project Site is characterized by minimal vegetation, including four (4) Deodar Cedar trees, one (1) Orange tree, one (1) Sweetshade tree, three (3) ornamental Musaceae trees and one (1) ornamental shrub, on the project site; and two Trees of Heaven (Ailanthus Altissima) within the public right-of-way. Elevations on the Project Site range from approximately 299 to 311 feet amsl.

As shown in **Figure 2.0-2, Aerial Photograph of the Project Site**, the Project Site includes approximately 33,425 square feet (0.77 acres) of lot area and currently is developed with an existing two-story hotel building, warehouse, and related surface parking. The two-story hotel currently houses a freestanding pole sign for City Center Hotel, which is considered a local historical resource because it is an example of a circa 1950 motel sign with neon letting and incandescent bulbs, and exemplified design features of the post–World War II period.

The Project Site is not located within a Methane Zone, Very High Fire Hazard Severity zone, Flood Zone, Alquist-Priolo Fault Zone, landslide zone, or liquefaction zone.

SURROUNDING LAND USES

The properties surrounding the Project Site include various commercial and apartment buildings, a hotel, retail shops, and a surface parking lot. **Figure 2.0-3, Westlake Community Plan Land**

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5 City of Los Angeles Department of City Planning, Central City West Specific Plan, Section 8.A.3 (2009).
6 City of Los Angeles Department of City Planning, Central City West Specific Plan, Section 6.C (2009).

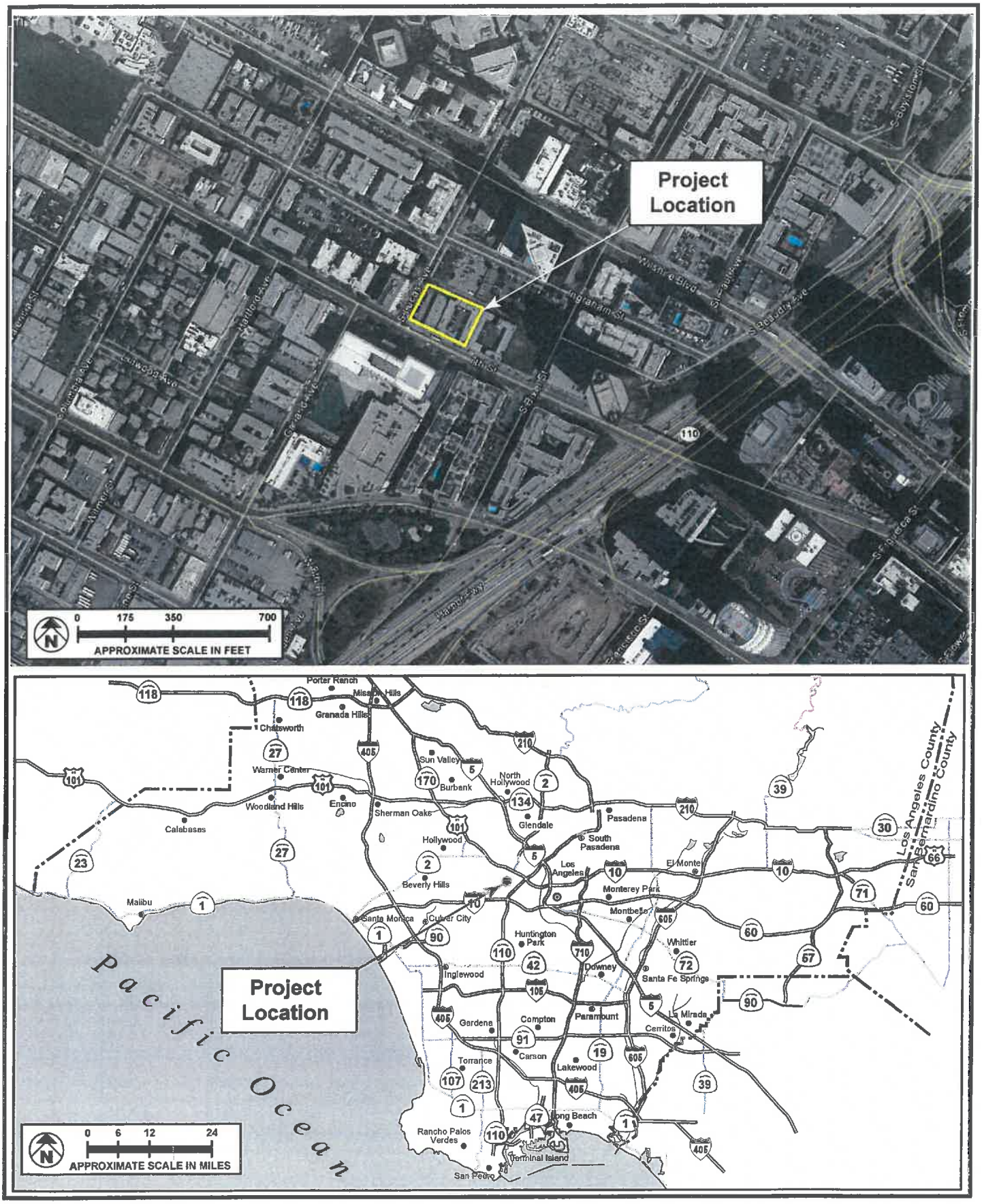
Use Map and **Figure 2.0-4, Central City West Specific Plan Zoning Map** depict the Land Use and Zoning Designation of the Project Site and the surrounding buildings.

South: The Project Site is bounded by 7th Street to the south. Properties to the southwest are zoned C4(CW)-U/4.5 and properties to the southeast are zoned C4(CW)-U/6. These parcels are developed with a nine-story commercial office building and a seven-story mixed-use residential development and designated as Regional Center Commercial.

North: A surface public parking lot is located directly north of the Project Site across the public alley. This parking lot is zoned C4(CW)-U/6 and designated Regional Center Commercial. Beyond this parking lot along Ingraham Street are a three-story apartment building, three-story office building, and a 37-story condominium building, all of which are also zoned C4(CW)-U/6 and designated Regional Center Commercial.

West: The Project Site is bounded by Lucas Street to the west. Across Lucas Street are two multifamily apartment buildings, ranging from four to 11 stories in height. Properties to the northwest and west are zoned R5(CW)-U/6 and C4(CW)-U/4.5 and designated High Density Residential and Regional Center Commercial, respectively.

East: Located immediately east of the Project Site is a three-story commercial building, occupied by a hotel. A vacant lot is located east of the hotel at the corner of 7th Street and Bixel Street. Properties to the east of the Project Site are zoned C4(CW)-U/6 and designated Regional Center Commercial.



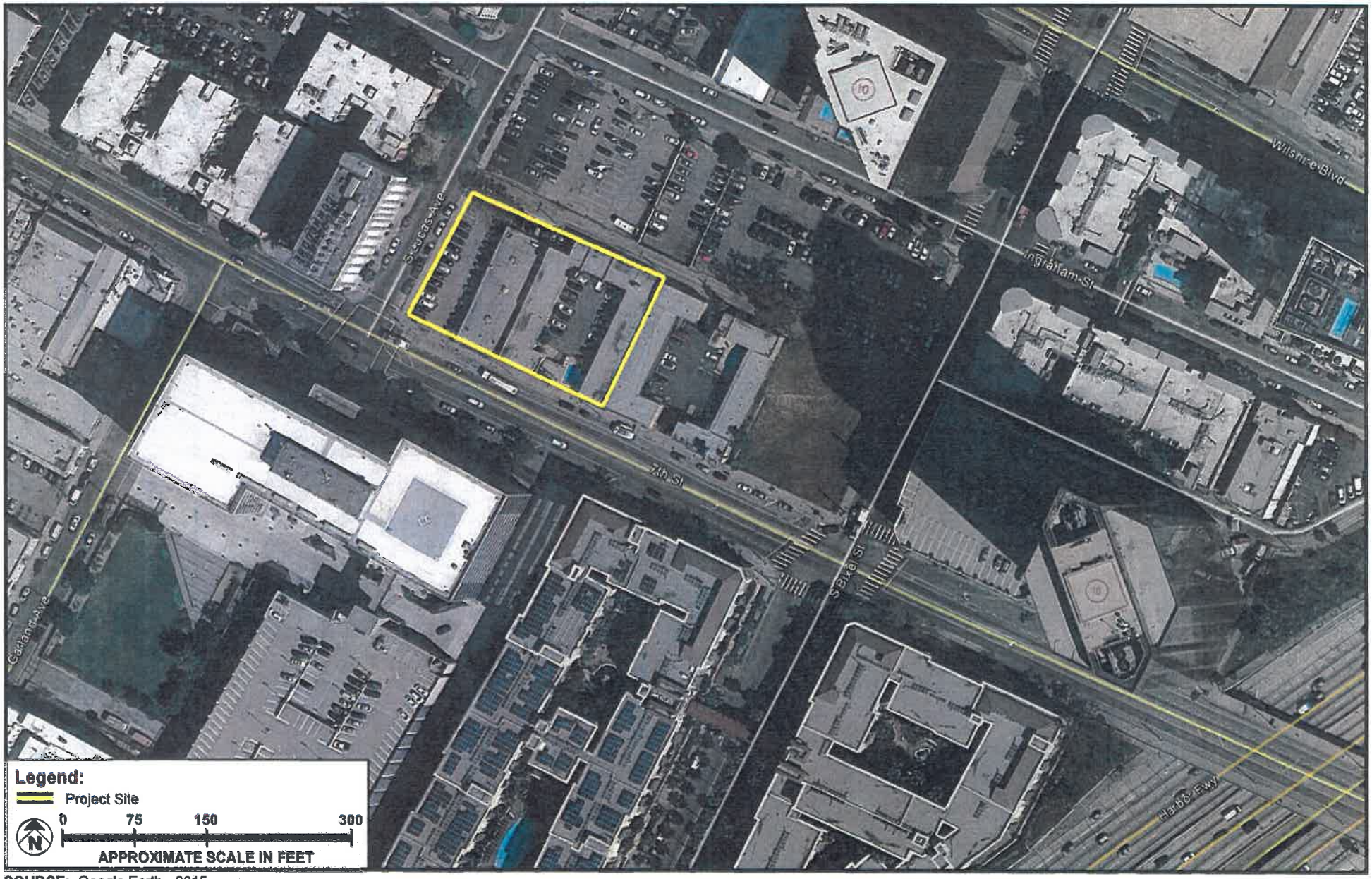
SOURCE: Google Earth - 2015

FIGURE **2.0-1**

Meridian Consultants

Project Location Map

107-001-15



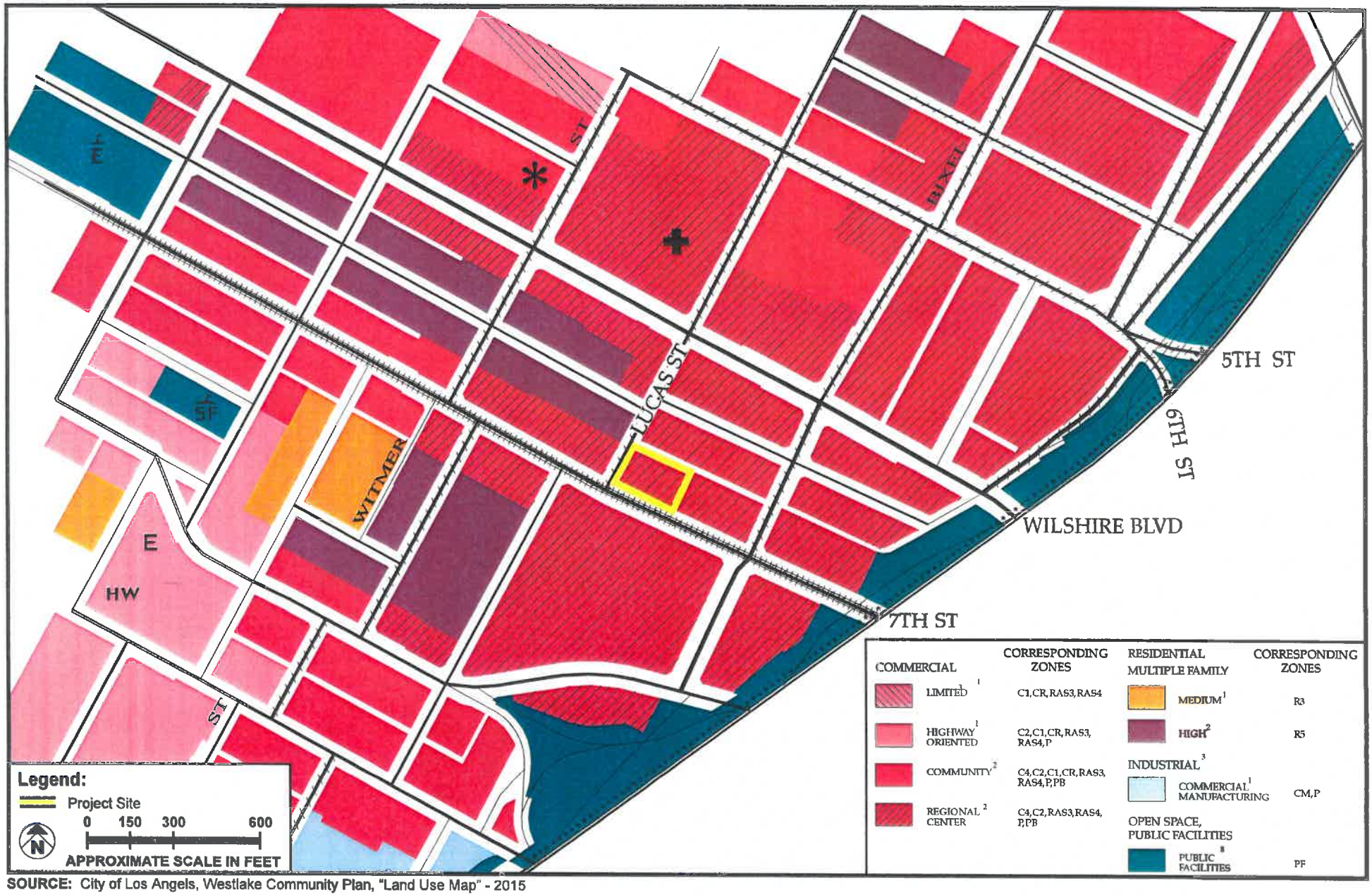
SOURCE: Google Earth - 2015

FIGURE **2.0-2**

Meridian Consultants

Aerial Photograph of the Project Site

107-001-15



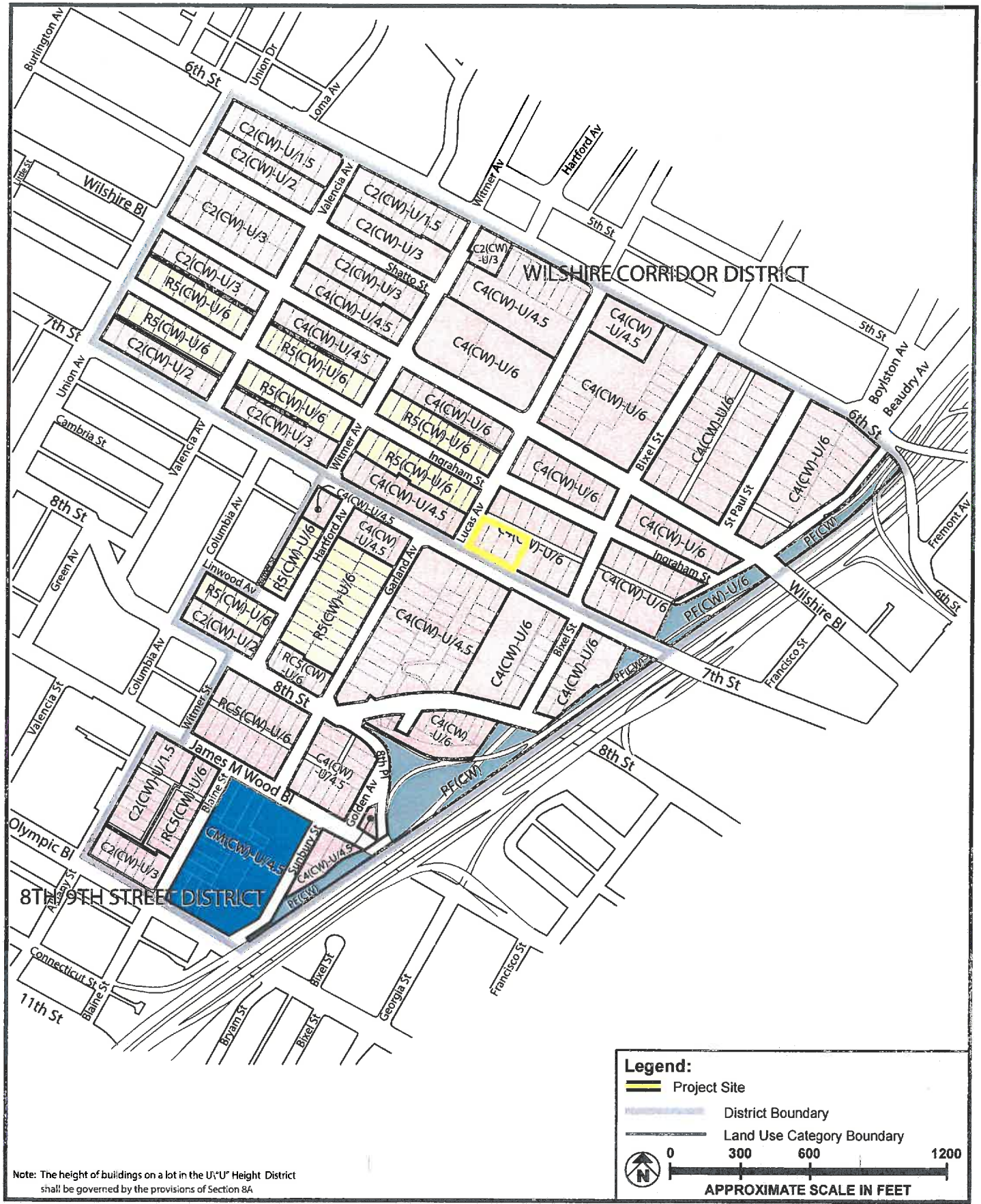
SOURCE: City of Los Angels, Westlake Community Plan, "Land Use Map" - 2015

FIGURE **2.0-3**

Meridian Consultants

Westlake Community Plan Land Use Map

107-001-15



SOURCE: City of Los Angeles, Central City West Specific Plan, "Wilshire Corridor District" - 2000

FIGURE 2.0-4

Meridian Consultants

Central City West Specific Plan Zoning Map

107-001-15

3.0 PROJECT DESCRIPTION

PROPOSED DEVELOPMENT

The Project would include the demolition of an existing two-story hotel building, warehouse, and related surface parking and the construction of a new 26-story, mixed-use residential building on an approximately 33,425 square-foot (0.77-acre) lot, as shown in **Figure 3.0-1, Aerial Site Plan**. The Project would consist of 7,291 square feet of ground floor commercial space and 241 dwelling units, including a total of up to 20 dwelling units that would be set aside for Very Low Income Households

Elements of the Project would include a ground floor lobby and entrance that features amenities such as a concierge. Additional residential amenities include a community room, pool and outdoor deck, rooftop garden, and other forms of open space and landscaping. The retail and commercial space would be located with frontages along 7th Street. The 241 dwelling units would be located above a six-level parking structure, which would include 1 level of subterranean parking. Access to the parking structure would be gained through both 7th Street and an alley entrance off of Lucas Avenue.

The proposed mixed-use building would have a maximum height of 278 feet to the top of the main roof and would contain approximately 288,416 square feet of total floor area. As shown in **Figures 3.0-2** through **3.0-8, Conceptual Floor Plans**, the 26-story, mixed-use building would consist of 63 studios, 93 one-bedroom units, 79 two-bedroom units, and 6 three-bedroom penthouse units, providing a total of approximately 233,241 square feet of residential floor area. Access to the residential units would be through an elevator centralized at the core of the building. As shown in **Figure 3.0-2,** the commercial and retail space and access to the lobby would be located on the ground floor. The above-grade parking would be located on floors one through five and the subterranean parking would be located on the basement level, as shown in **Figures 3.0-3 and 3.0-4.** As shown in **Figures 3.0-5, 3.0-6, 3.0-7**, and **3.0-8**, the residential dwelling units would be located on floors 6 through 26, with the penthouse units comprising floors 25 and 26. The sixth floor podium level would consist of 6 residential units and the pool and outdoor deck. The Project also includes approximately 37,122 square feet of open space, with approximately 6,425 square feet of landscaping. As part of the Project design, the City Center Hotel sign would be retained on site and located on the outdoor deck above the ground-floor retail areas (see **Figures 3.0-9, Building Elevations**).

ARCHITECTURAL DESIGN

The development would be 278 feet high from the lowest adjacent grade to the top of the main roof. The first 6 levels of mixed-use building would consist of parking and levels 7 through 26 would consist of residential units above the podium level. Structured parking would be concealed with parking provided on the subterranean level in addition to glass and metal fronting covering levels 1 through 6. Architectural materials would include a mix of corrugated metal, metal paneling, tinted glass, storefront glazing, metal guardrails, exposed concrete columns, metal awnings, and glass. Building elevations depicting the scale and massing of the proposed development are shown in **Figures 3.0-9.**

OPEN SPACE AND LANDSCAPING

Figure 3.0-10, Landscape Plan, depicts the open space and landscaping proposed for the Project. As shown in the figures, the Project would provide code-required residential open space for the development. Based on the number of units and the preliminary mix of unit types, approximately 24,100 square feet of common open space would be required and approximately 28,172 square feet of common open space would be provided for the Project. At the podium level on the sixth floor, the Project would include an approximately 11,058 square-foot pool and outdoor deck areas, an approximately 3,280 square-foot covered deck area, and an approximately 4,140 square-foot community room. Open space on the ground floor includes an approximately 2,400 square-foot interior lobby area. Other open space areas include the 6,550 square-foot roof garden, and the 1,627 square-foot landscaped seating area on parking level 1.5, totaling 28,172 square feet of common open space. Of this total, the project is credited 25,733.25 square feet where a minimum of 24,100 square feet of common open space is required by the Central City West Specific Plan. The project also provides approximately 8,950 square feet of private balcony space, totaling 34,683.25 square feet of usable open space. Of this total, the project is credited 37,122 square feet, where a total of 26,525 square feet of open space is required by the LAMC.

Approximately 7,442 square feet of landscaping would be provided within the open space areas, including the pool deck area. Pursuant to the Central City West Specific Plan, one tree is required to be provided on site for every dwelling unit.[7] The Project proposes to plant 121 trees on the Project Site along the north and east property boundaries and on the podium level along 7th Street. The Project proposes to locate up to 50 percent of the required 241 trees off site. Five (5)

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7 City of Los Angeles Department of City Planning, Central City West Specific Plan, "Appendix D–Urban Design Guidelines, Section C.2" (2009).

King Palm Trees are proposed within the public rights-of-way along 7th Street, along with bike racks.

FLOOR AREA

The zoning designation for the Project Site is C4(CW)-U/6. Per Section 6.C of the Central City West Specific Plan, the site is permitted a maximum Floor Area Ratio (FAR) of six times the buildable area of the lot. Furthermore, pursuant to LAMC Section 12.22.A.25(f)(4), a project that sets aside 11 percent of the dwelling units for affordable housing (for Very Low Income Households) can qualify for a 35 percent increase in the allowable FAR. The Project includes up to 20 dwelling units restricted for Very Low Income Households, and therefore qualifies for a 35 percent increase in the allowable FAR. As such, a 35 percent increase from the allowable FAR would be a maximum of 8.0:1 FAR.[8] With the applied maximum FAR of 8.0:1, the Project Site, which contains a total lot area of 33,425 square feet, could have a total floor area of 288,416 square feet.[9]

DENSITY

The State Density Bonus Program and LAMC Section 12.22.A.25(c)(1) allow for a 35 percent Density Bonus if 11 percent of the permitted units are reserved for Very Low Income Households, 20 percent of the units are reserved for Low Income Households or 30 percent of the units are reserved for Moderate Income Households. Because the Project would reserve up to 20 (or 11 percent of the number of units allowed under the base zoning) of the dwelling units for Very Low Income Households, a 35 percent density bonus is permitted. Therefore, the Project is considered a Housing Development Project under the Density Bonus provisions of the LAMC Section 12.22.A.25.

LAMC Section 12.22.A.18 provides regulations for developments combining residential and commercial uses, allowing any uses permitted in the R5 Zone on a lot in the C4 Zone, provided it is located within an area designated for Regional Community land uses. Pursuant to LAMC Section 12.12.C4, the minimum lot area per dwelling unit for properties within the R5 Zone is 200 square feet, permitting a maximum of 161 dwelling units within the R5 zoned portion of the Project Site (33,425 SF [Project Site area)] – 3,300 SF [street dedication] + 2,182 SF (alley area) = 32,307 SF ÷ 200 SF/DU = 161 DU).[10] However, with the proposed 35 percent density bonus and two on-

8 Height District No. 2 allowable FAR of 6.0:1 × 1.35 = 8.0:1 FAR.
9 30,125 SF (Project Site pre-dedication) + 2,182 SF (alley area) x 8.0:1 FAR = 32,307 SF × 8 = 288,416 SF.
10 The 33,425 square-foot Project Site area is contingent with the Project's architectural plans.

menu incentives, the Project proposes an increase in the number of dwelling units by 80 additional units, which would result in a total of 241 dwelling units permitted on the Project Site (33,425 SF [Project Site area] + 2,182 [alley area] = 35,607 SF ÷ 200 SF/DU = 178 DU × 1.35 = 241 DU).

PARKING AND ACCESS

Vehicular access to parking would be provided by driveways on 7th Street and the alley entrance via Lucas Avenue. A total of 341 parking spaces will be provided within a six-level parking structure, which would include one level of subterranean parking. Access to both the subterranean level and the ground-floor level would be provided from the 7th Street driveway. The remaining parking spaces, which would be located on the 5 levels of the aboveground parking structure, would be provided access from the alley entrance along Lucas Avenue. The 341 spaces consist of 276 residential spaces, 15 commercial spaces, 42 guest spaces, and 8 ADA spaces. The Project would also provide 278 bicycle spaces, which would include 246 long-term and 32 short-term bicycle spaces. Vehicle and bicycle parking would satisfy the requirements of the LAMC.

The Project Site falls within the Central City Parking District as defined by the LAMC; therefore, parking ratios were determined by applying the appropriate parking ratios from the LAMC, Section 12.21.A.4.[11] As shown in **Table 3.0-1, Code Parking Requirements,** the Project requires a total of 301 parking spaces. As previously mentioned, the Project would provide 341 parking spaces and would meet the LAMC requirements for on-site parking supply.

Table 3.0-1
Code Parking Requirements

	Units	Code Requirement	Parking Required
Residential Development			
Studio	63 du	1 sp/1 du	63 sp
1 bedroom	93 du	1 sp/1 du	93 sp
2 and 3 bedroom	85 du	1.25 sp/1 du	107 sp
		Total Required	**263 sp**
Commercial/Retail Development			
Retail	7,291 sq. ft.	1 sp/500 sq. ft.	15 sp
		Total Required	**15 sp**
		Total Required Parking Spaces	278
		Total Provided Parking Spaces	**341**

As required for the Central City District by Section 12.21.A4 of the City of Los Angeles Municipal Code.
Note: sp = parking space; du = dwelling units; sq. ft. = square feet.

11 City of Los Angeles Department of City Planning, LAMC, Parking Requirements, sec. 12.21 A.4.

CONSTRUCTION

Construction Schedule/Phasing

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final build-out occurring mid-2019. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition/site clearing; (2) site preparation/grading; and (3) building construction. The building construction phase includes constructing the proposed mixed-use building, connecting utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. A breakdown of the construction phases, timelines, and anticipated equipment is provided in **Table 3.0-2, Project Construction Phasing and Equipment.**

Table 3.0-2
Project Construction Phasing and Equipment

Construction Phase	Approximate Duration	Example of Equipment
Demolition/Site clearing	1 month	Excavators, rubber-tired dozers
Site preparation/Grading	2 months	Graders, tractors, loaders, backhoes
Building construction	22 months	Cranes, forklifts, air compressors, pavers, rollers, tractors, loaders, backhoes

Demolition/Site Clearing Phase

Demolition will remove existing site work, which includes a two-story hotel building, warehouse, and surface parking lots. Demolition would occur for approximately one month and would include site clearing.

Site Preparation and Grading

After the completion of site clearing, an excavation phase for the Project would occur for approximately two months and would involve the shoring and excavation of land to ensure the proper base and slope for the building foundations.

Building Construction Phase

The building construction phase consists of below-grade and above-grade structures and is expected to occur for approximately 22 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final four months of the building construction phase, and paving would occur during the final month of construction.

Street Closures

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other

construction activities as may be required. However, site deliveries and the 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 agencies 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 provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays or national holidays. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

Haul Routes

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the site that cannot be recycled or diverted would be hauled to the Chiquita Canyon or the Manning Pit Landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. The Chiquita Canyon Landfill is approximately 45 miles northwest of the Project Site (approximately 90 miles round trip). The Manning Pit Landfill is approximately 26 miles northeast of the Project Site (approximately 52 miles round trip). For recycling efforts, the Central Los Angeles Recycling Center and Transfer Station (Browning Ferris Industries) accepts construction waste for recycling and is located approximately 18 miles north from the Project Site (approximately 36 miles round trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks and/or trucks with tandem trailers having up to a 14-cubic-yard hauling capacity, with approximately 152 daily hauling truck-trips at its peak. All truck staging would either occur on site or at designated off-site locations and radioed into the site to be filled. Any haul route specified may be modified in compliance with City policies, provided the Los Angeles Department of Transportation (LADOT) and/or City of Los Angeles Bureau of Street Services approves any such modification.

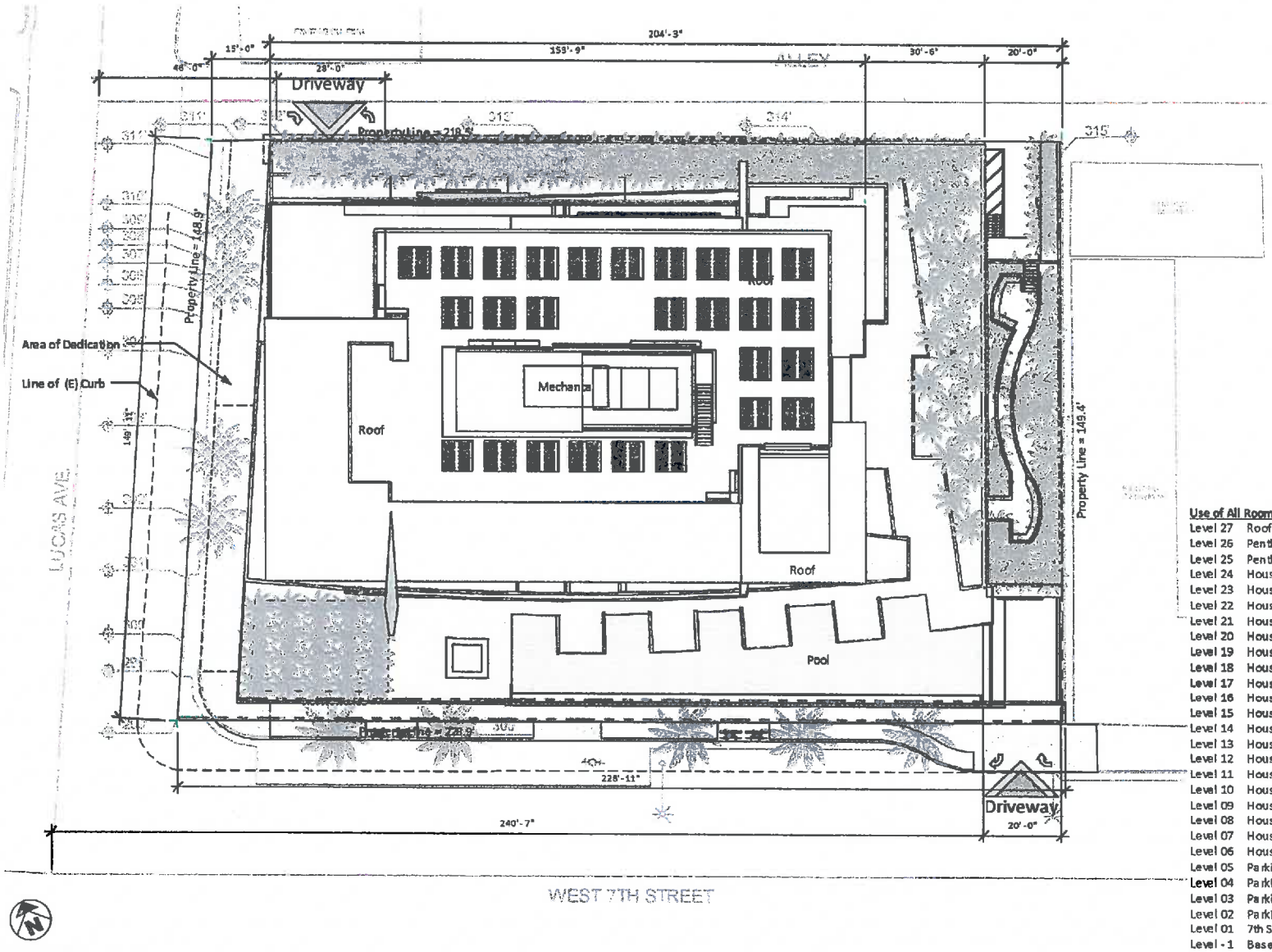
REQUESTED APPROVALS

The application(s) request approval of the following:

Project Permit Compliance: Review and approval of the Site Plan. (LAMC Section 11.5.7)

Density Bonus/Affordable Housing Incentives Determination: Approval for a 35 percent density bonus and two on-menu incentives that include a 35 percent increase in floor area ratio and density calculation based on the inclusion of land area required to be dedicated for street or alley purposes. (LAMC Section 12.22A25).

Other Plan Approvals: Other Plan Approvals would include the request to locate up to 50 percent of the required 241 trees to an off-site location (Central City West Specific Plan, Appendix D—Urban Design Guidelines, Section C.2).



Use of All Rooms Per Floor

Level 27	Roof / Roof Top Garden	
Level 26	Penthouse 2	
Level 25	Penthouse 1	6 Units
Level 24	Housing -19	12 Units
Level 23	Housing -18	12 Units
Level 22	Housing -17	12 Units
Level 21	Housing -16	12 Units
Level 20	Housing -15	12 Units
Level 19	Housing -14	13 Units
Level 18	Housing -13	13 Units
Level 17	Housing -12	13 Units
Level 16	Housing -11	13 Units
Level 15	Housing -10	13 Units
Level 14	Housing -9	13 Units
Level 13	Housing -8	13 Units
Level 12	Housing -7	13 Units
Level 11	Housing -6	13 Units
Level 10	Housing -5	13 Units
Level 09	Housing -4	13 Units
Level 08	Housing -3	13 Units
Level 07	Housing -2	13 Units
Level 06	Housing -1,	6 Units, Community Room & Pool Deck
Level 05	Parking-4	Parking
Level 04	Parking-3	Parking
Level 03	Parking-2	Parking
Level 02	Parking-1, Alley	Parking & Trash Pickup
Level 01	7th St Retail	Parking & Retail
Level - 1	Basement Parking	Parking

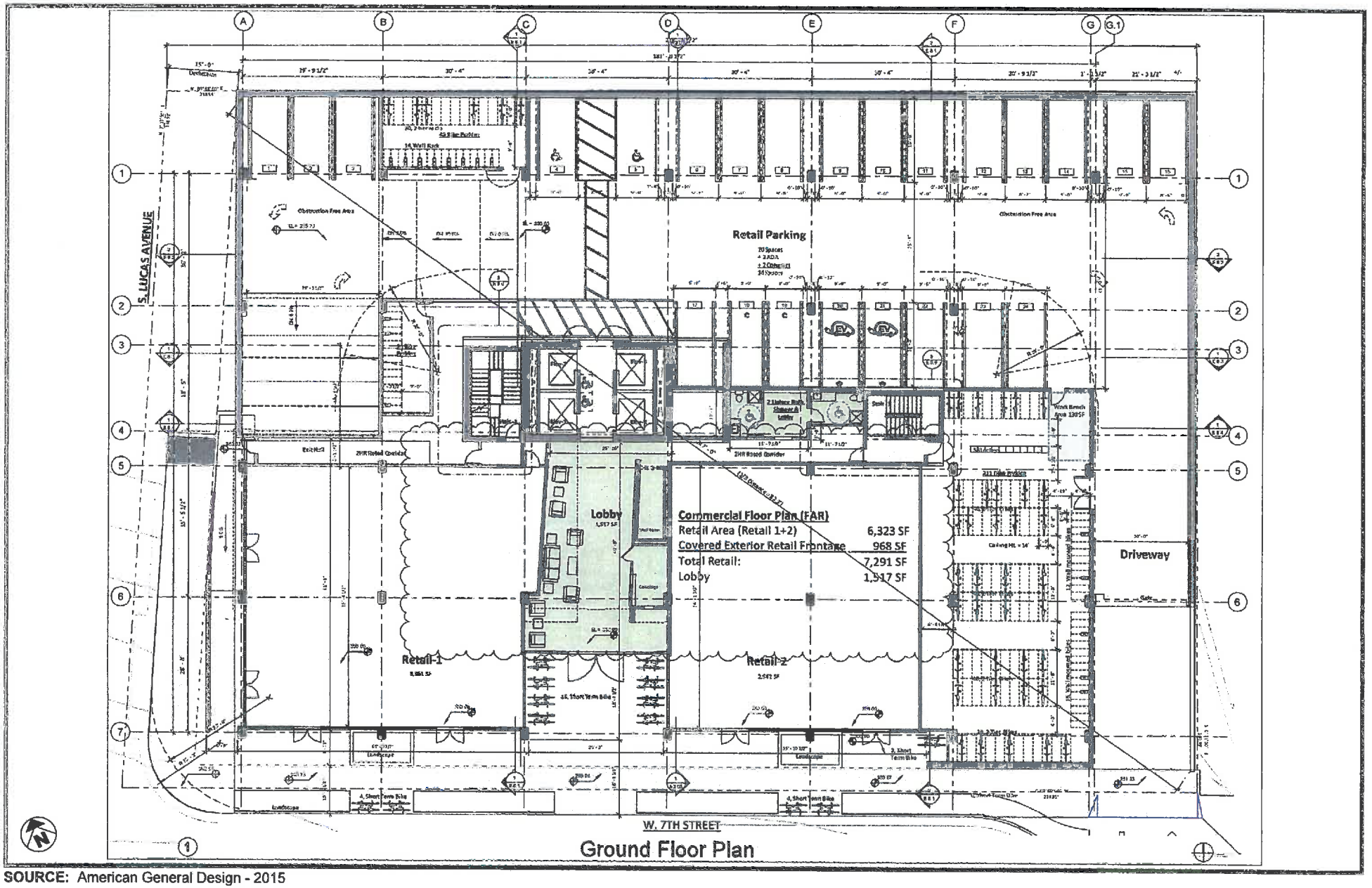
SOURCE: American General Design - 2015

FIGURE **3.0-1**

Meridian Consultants

Aerial Site Plan

107-001-15



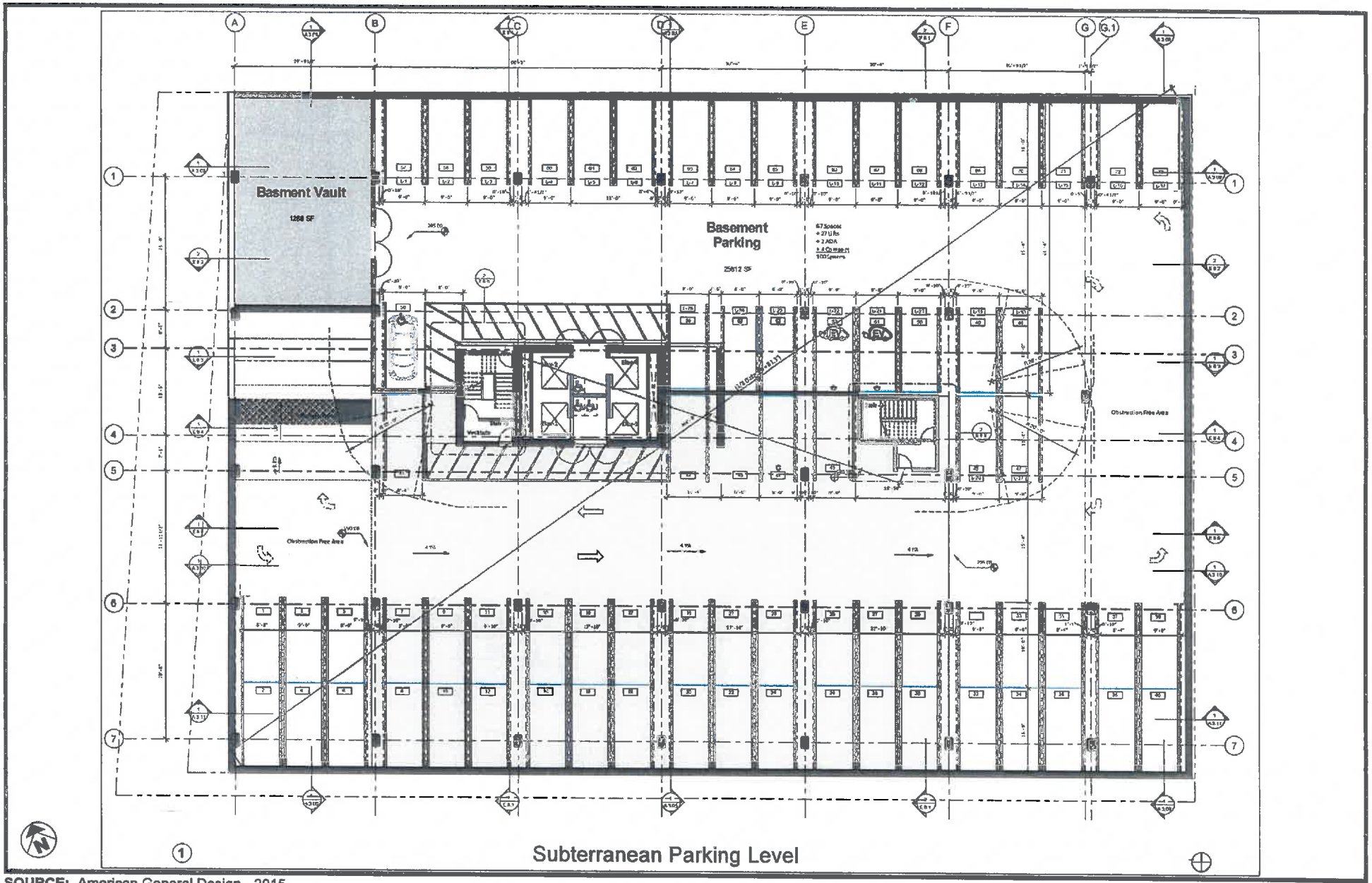
SOURCE: American General Design - 2015

FIGURE **3.0-2**

Meridian Consultants

Conceptual Floor Plans

107-001-15



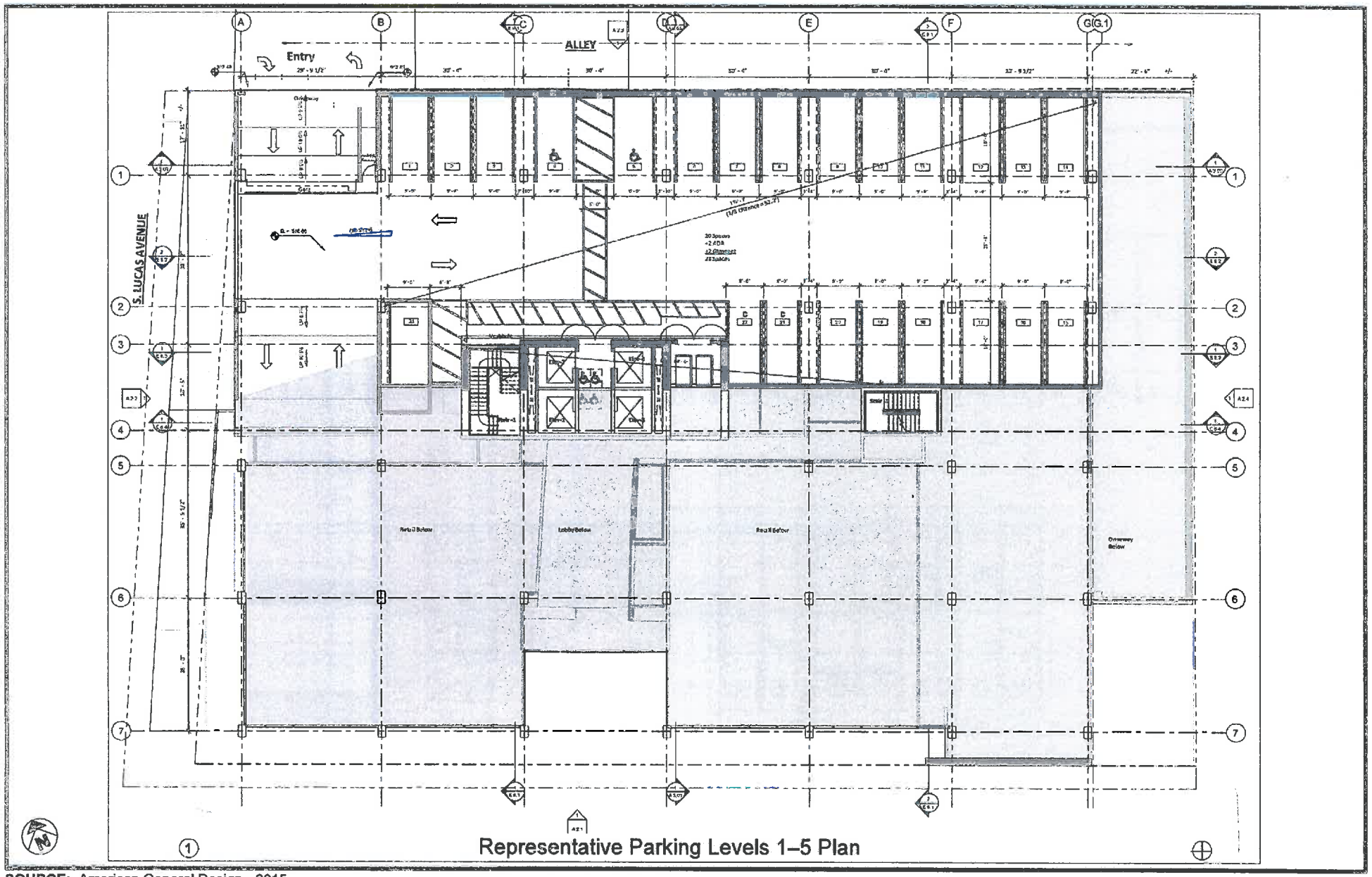
SOURCE: American General Design - 2015

FIGURE **3.0-3**

Meridian Consultants

Conceptual Floor Plans

107-001-15



Representative Parking Levels 1–5 Plan

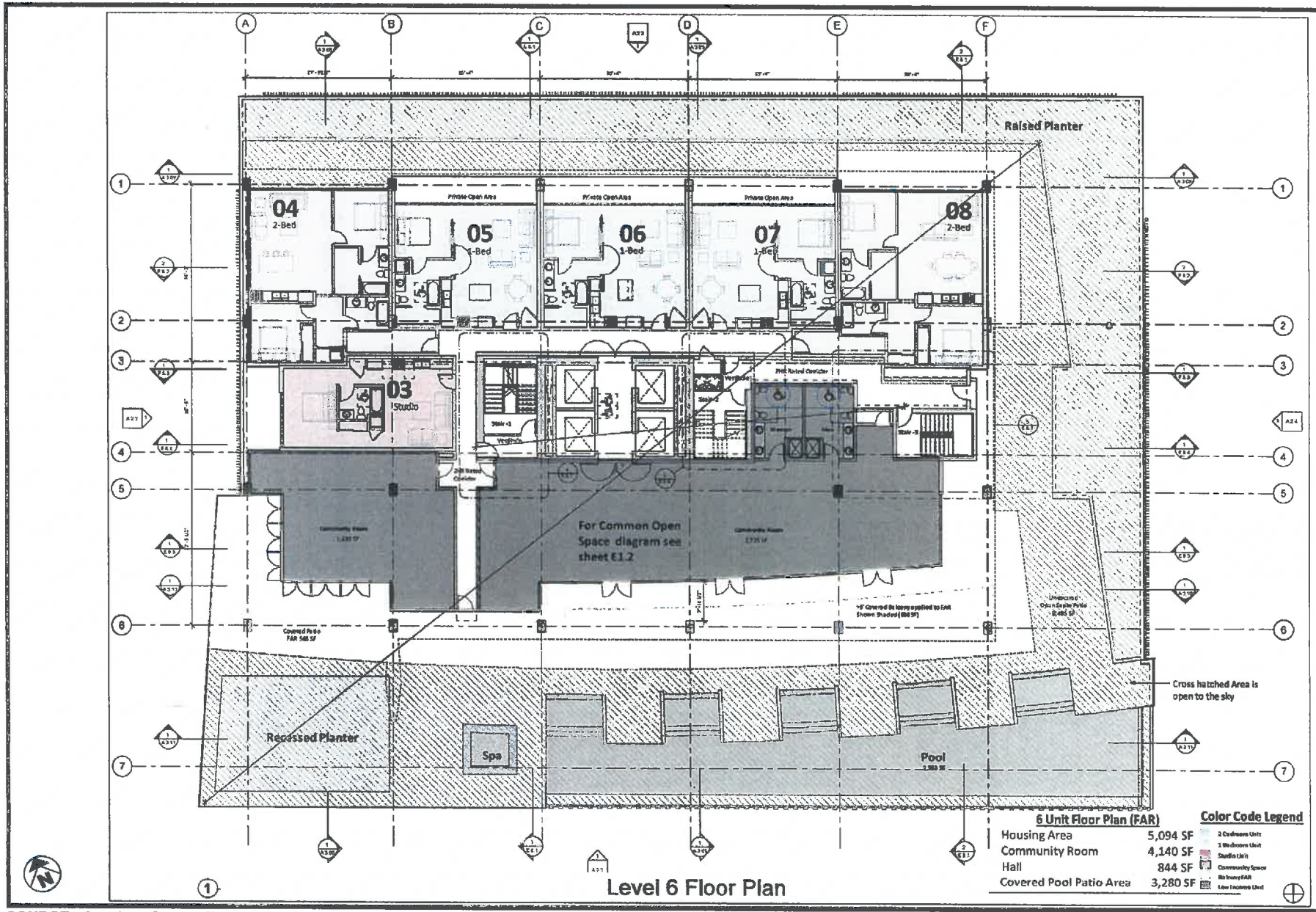
SOURCE: American General Design - 2015

FIGURE **3.0-4**

Meridian Consultants

Conceptual Floor Plans

107-001-15



Level 6 Floor Plan

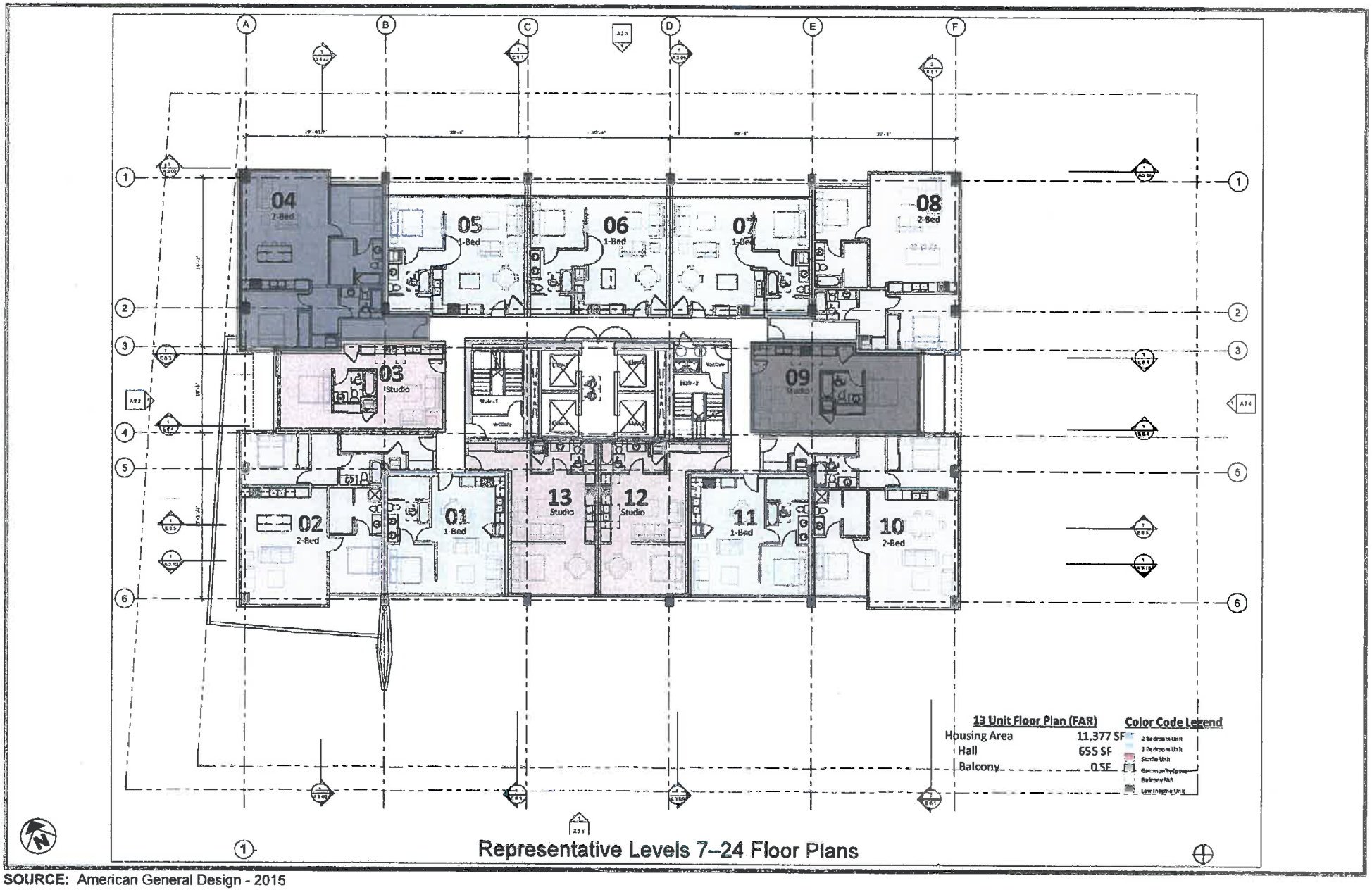
SOURCE: American General Design - 2015

FIGURE **3.0-5**

Meridian Consultants

Conceptual Floor Plans

107-001-15



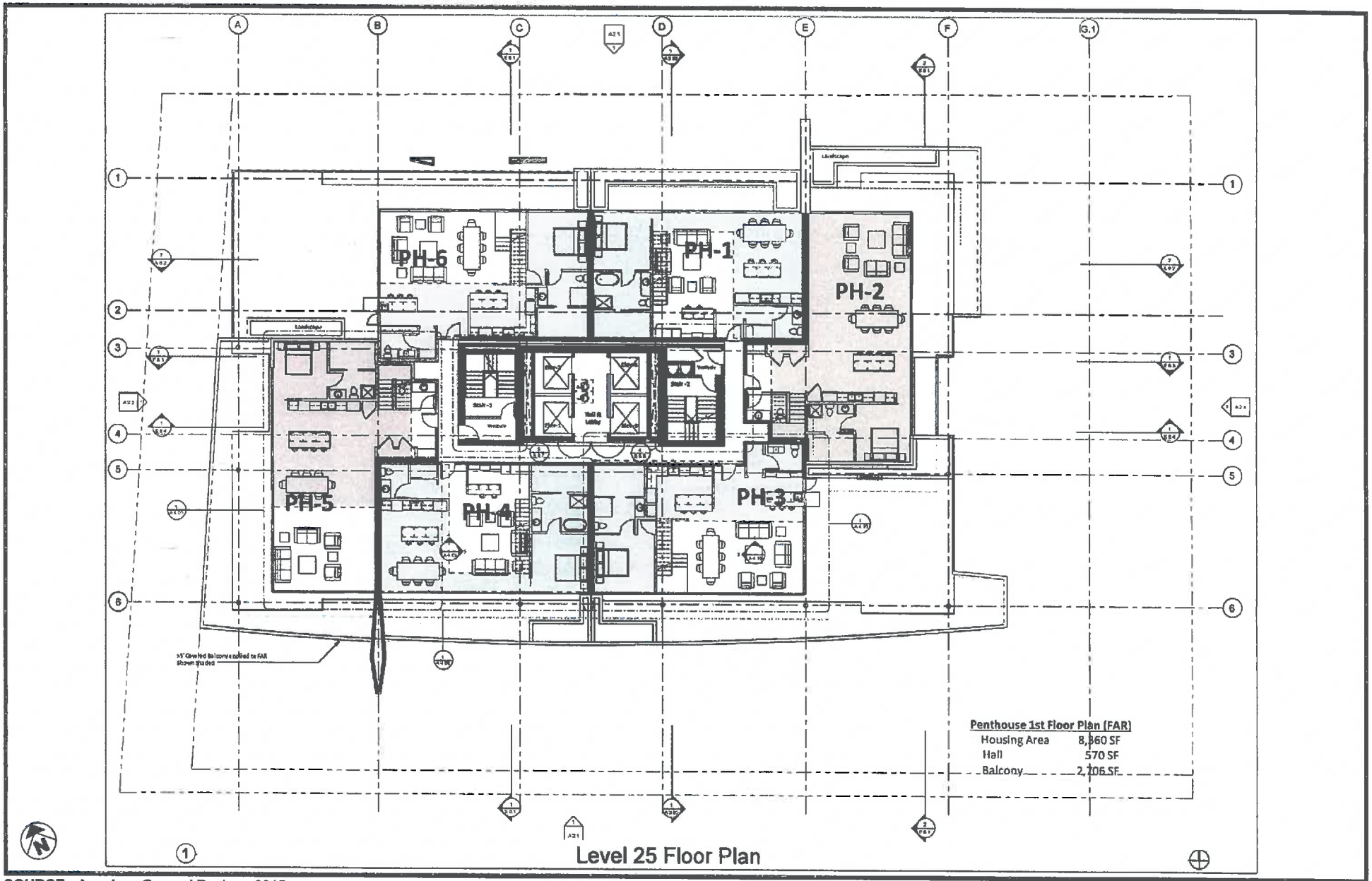
SOURCE: American General Design - 2015

FIGURE **3.0-6**

Meridian Consultants

Conceptual Floor Plans

107-001-15



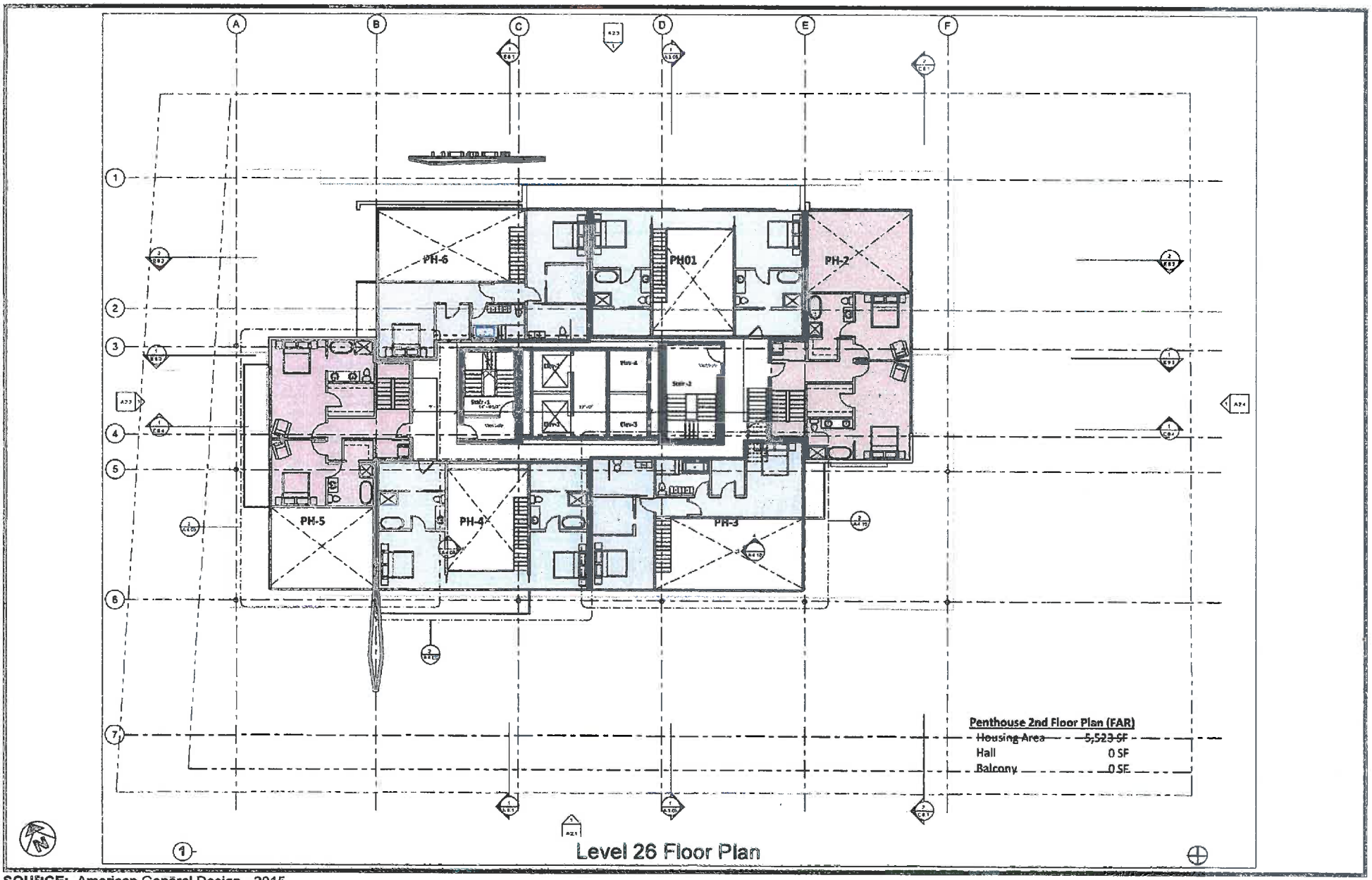
SOURCE: American General Design - 2015

FIGURE **3.0-7**

Meridian Consultants

Conceptual Floor Plans

107-001-15



SOURCE: American General Design - 2015

FIGURE **3.0-8**

Meridian Consultants

Conceptual Floor Plans

107-001-15

SOURCE: American General Design - 2015

FIGURE **3.0-9a**

Meridian Consultants

Building Elevations

107-001-15

SOURCE: American General Design - 2015

FIGURE **3.0-9b**

Meridian Consultants

Building Elevations

107-001-15

SOURCE: American General Design - 2015

FIGURE **3.0-9c**

Meridian Consultants

Building Elevations

107-001-15

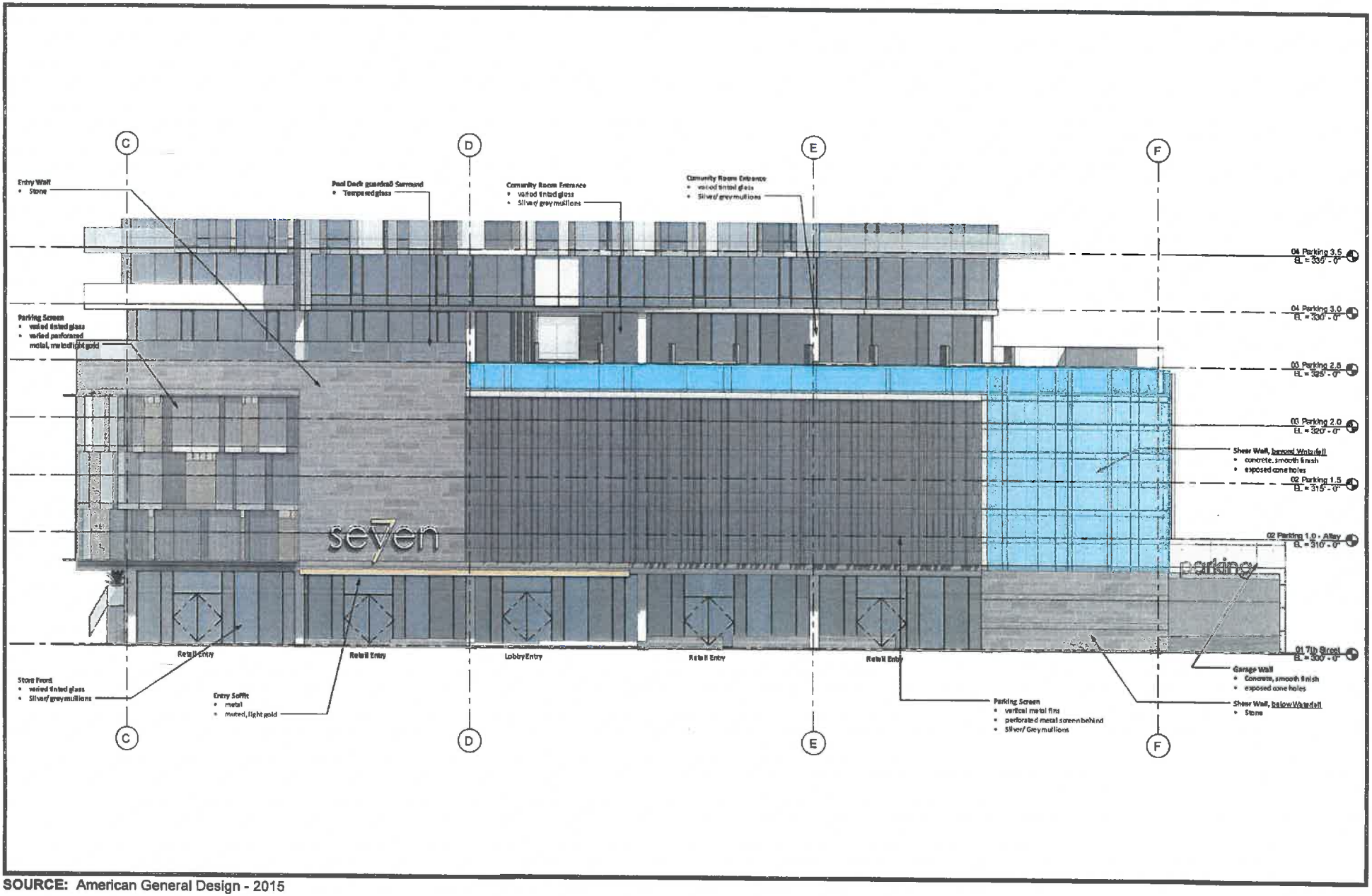
SOURCE: American General Design - 2015

FIGURE **3.0-9d**

Meridian Consultants

Building Elevations

107-001-15



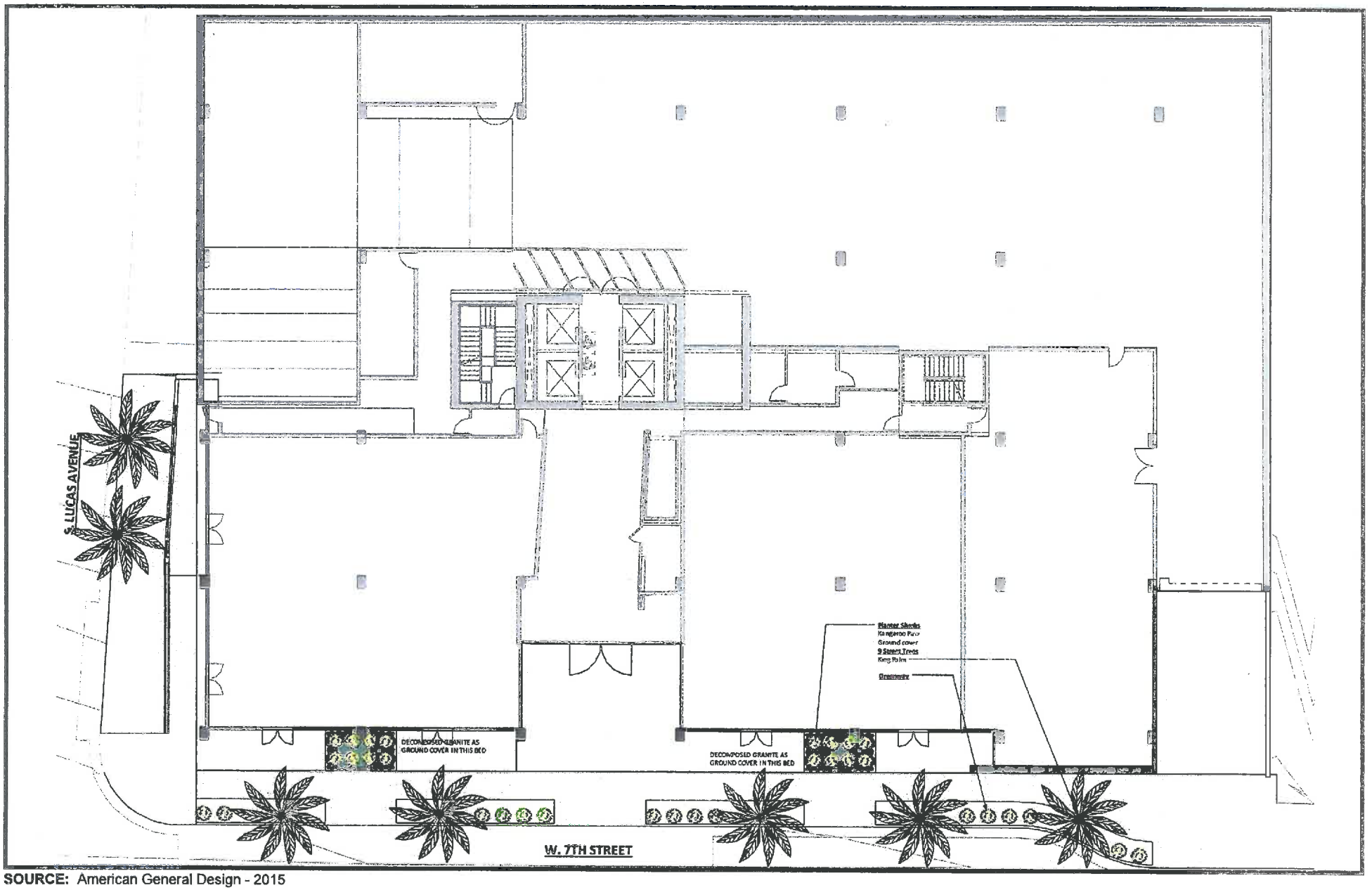
SOURCE: American General Design - 2015

FIGURE **3.0-9e**

Meridian Consultants

Building Elevations—Entry

107-001-15



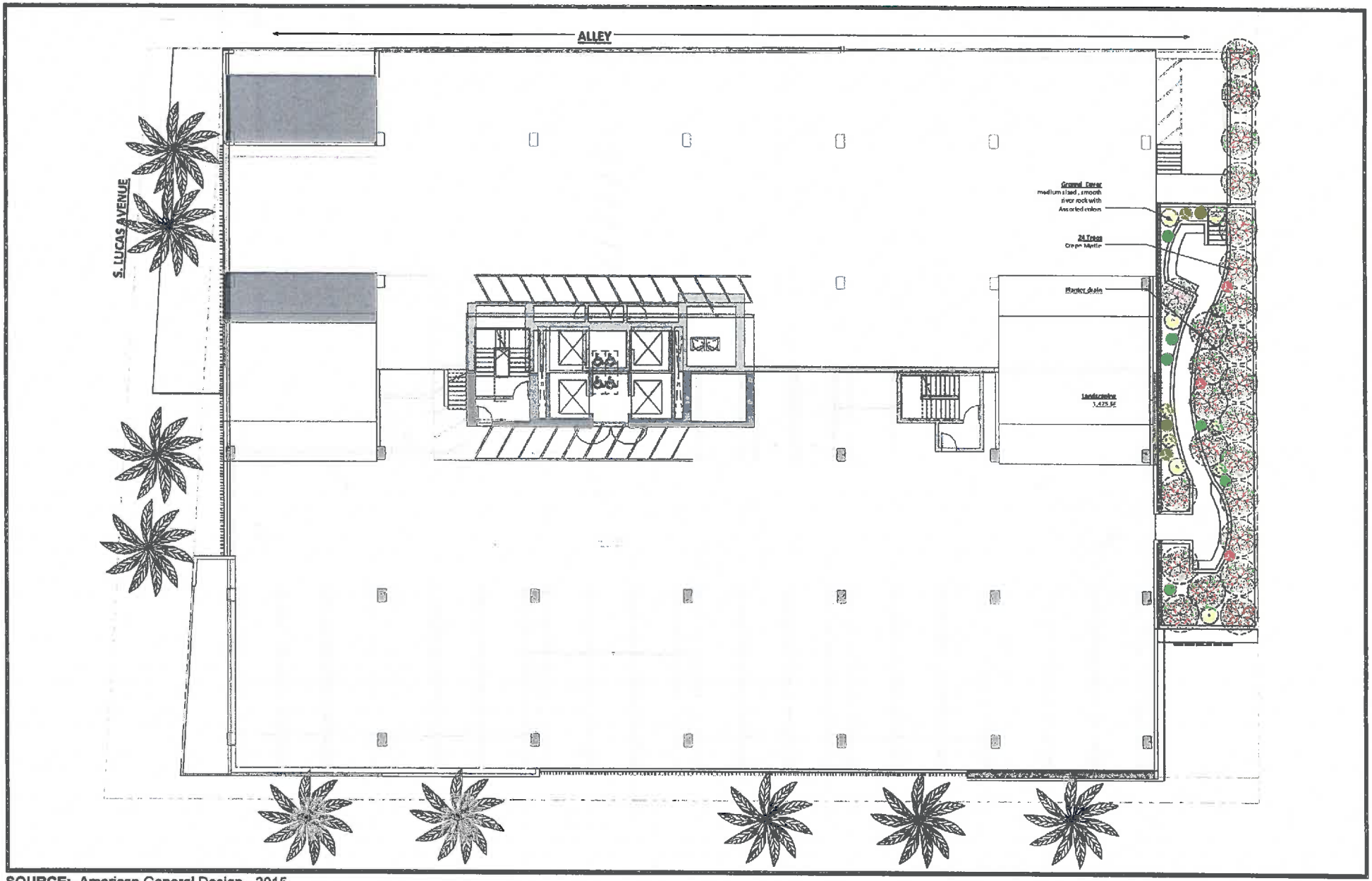
SOURCE: American General Design - 2015

FIGURE **3.0-10a**

Meridian Consultants

Landscape Plan—Ground Level

107-001-15



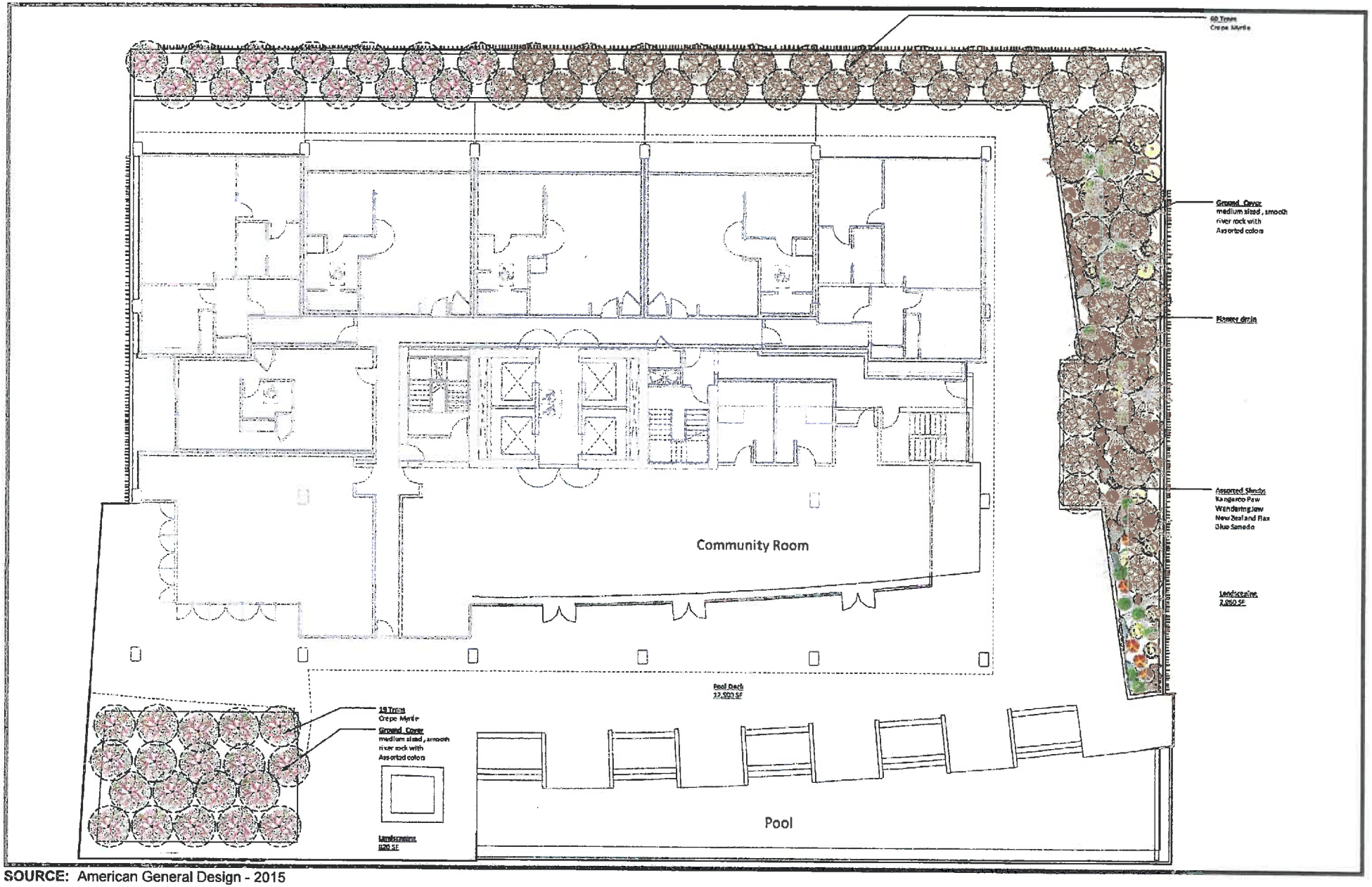
SOURCE: American General Design - 2015

FIGURE **3.0-10b**

Meridian Consultants

Landscape Plan—Alley Level

107-001-15



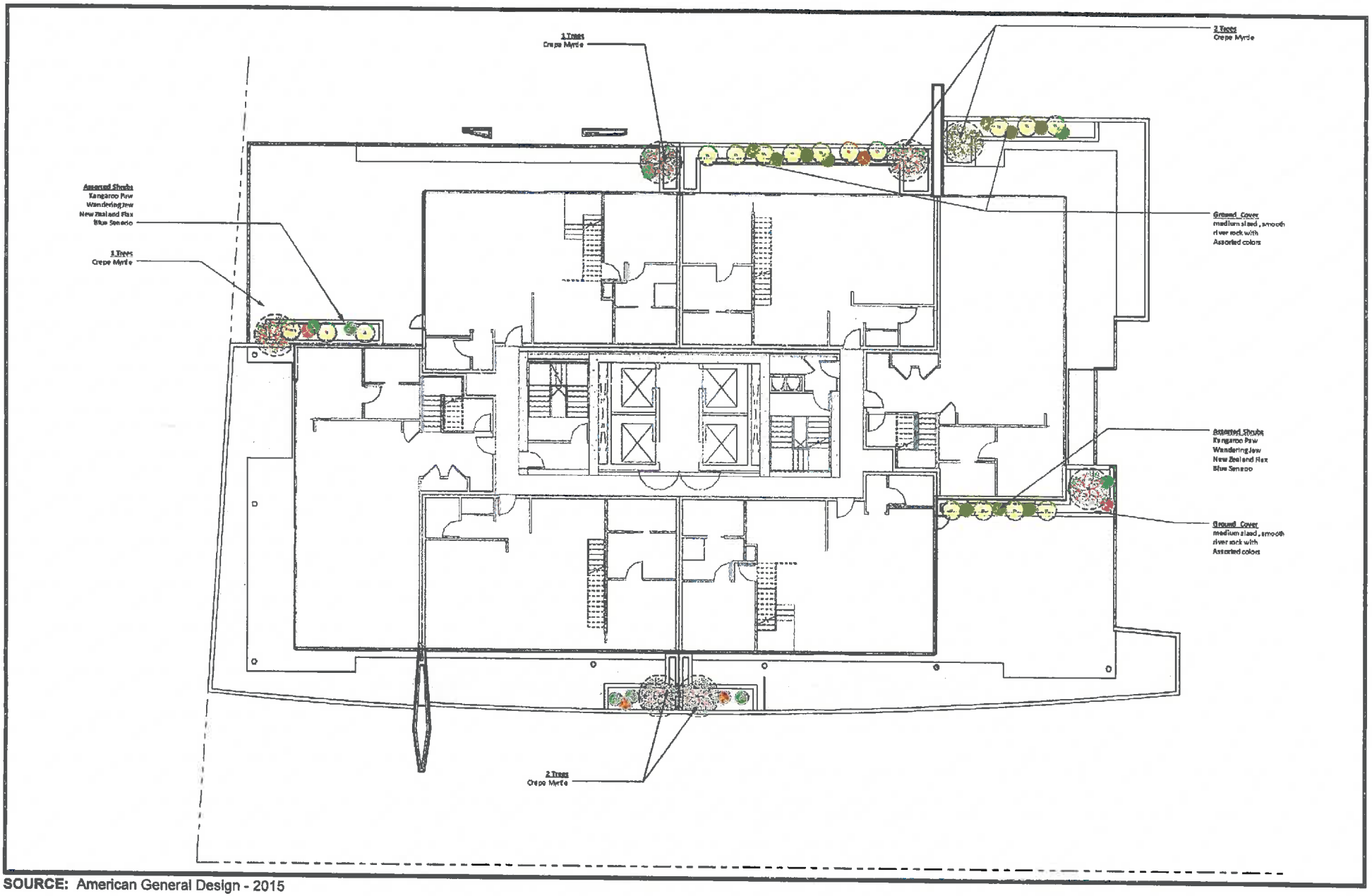
SOURCE: American General Design - 2015

FIGURE **3.0-10c**

Meridian Consultants

Landscape Plan—Pool Deck (Level 6)

107-001-15



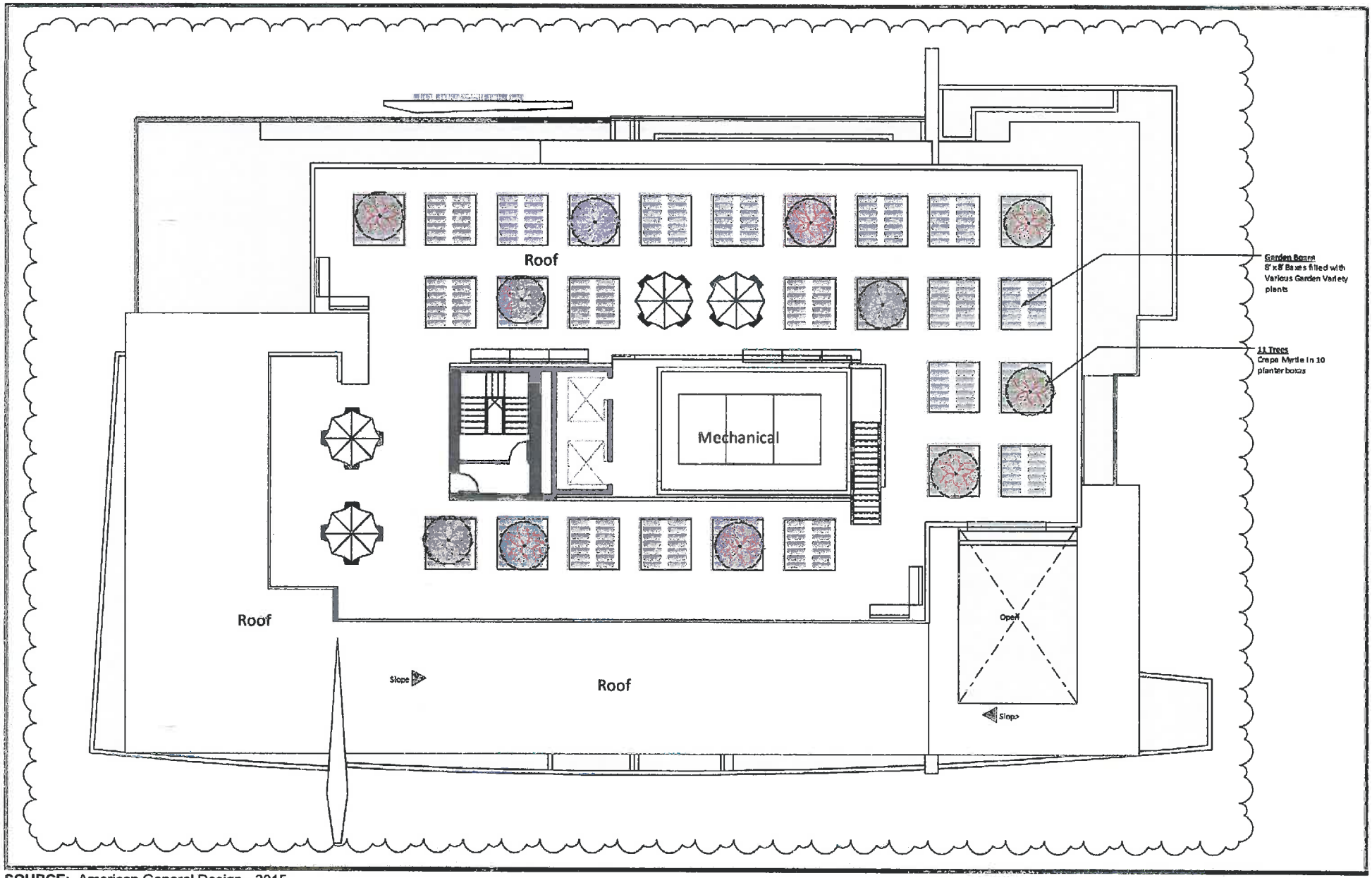
SOURCE: American General Design - 2015

FIGURE **3.0-10d**

Meridian Consultants

Landscape Plan—Penthouse

107-001-15



SOURCE: American General Design - 2015

FIGURE 3.0-10e

Meridian Consultants

Landscape Plan—Roof Garden

107-001-15

4.0 ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State *CE*QA Guidelines, California Code of Regulations, Title 14, Chapter 3, 15000-15387). The thresholds of significance are based on the *Los Angeles (L.A.) CEQA Thresholds Guide*.

4.1 AESTHETICS

Impact Analysis

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

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

The Project Site is located within the Westlake area of Los Angeles, approximately 0.15 miles west of SR 110 (Pasadena Freeway), approximately 1 mile north of the I-10, and approximately 1.2 miles south of US 101 (Hollywood Freeway). The SR 110, known as the Historic Arroyo Seco Byway, is designated as a National Scenic Byway because of the structural and architectural elements of the original parkway that still remain since its opening in 1940.[12] When looking north and slightly east from the northbound I-110, the skyline of Downtown Los Angeles can be seen clearly. As such, views in the area are generally urban in character and defined by low-, medium-, and high-rise multifamily apartment buildings, mixed-use buildings, and commercial buildings. Similar views exist when looking to the east and west.

The Project Site is currently developed with an existing two-story hotel, warehouse, and related surface parking. The Project Site is not located within or along a designated scenic corridor, and no scenic views exist from or through the currently developed site. The Project would develop a 26-story, mixed-use residential building with ground floor commercial uses. The Project would alter the existing views and character of the surrounding area in a manner that is compatible with the urban form of the Westlake Community Plan area of Los Angeles. The Project would be visually compatible with the surrounding neighborhood and is consistent with several other mixed-use residential, commercial, and recreational developments in the Westlake area. Furthermore, neither the Scenic Highways Plan of the City of Los Angeles General Plan ("General Plan") nor the Westlake Community Plan identifies any scenic vistas within the immediate vicinity of the Project Site.

12 California Department of Transportation (Caltrans), District 7, "District 7 Projects" (2007), http://www.dot.ca.gov/dist07/travel/projects/details.php?id=6, accessed September 2015.

In addition, Senate Bill (SB) 743 was signed into law by Governor Brown in September 2013, which made several changes to the CEQA for projects located in areas served by transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered to have a significant impact on the environment. SB 743 defines a transit priority area as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the A.M. and P.M. peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. However, the exemption for aesthetic impacts does not include impacts to historic or cultural resources, per Section 21099 of the PRC. The proposed project involves the construction of a mixed-use development containing a 241 dwelling units and 7,291 square feet of ground floor commercial in a transit priority area. The project site is located within one-half mile of an intersection where two or more major bus routes with service interval frequency as stated are located and is identified as being located within a transit priority area (City of Los Angeles Transit Priority Area Map, 2016). The proposed project is an infill development on a site that adjoins parcels that are developed with various urban uses including a nine-story commercial office building and a seven-story mixed-use residential development to the south across 7th Street; a surface public parking lot to the north, two multifamily apartment buildings to the west across Lucas Avenue, and a three-story commercial building, occupied by a hotel to the east. Furthermore, the project site does not contain any historic or cultural resources, as discussed in Section V. Cultural Resources of this Initial Study. As such, the proposed project meets all criteria specified in Section 21099 of the PRC. Therefore, the project's impact on visual resources, aesthetic character, light and glare, scenic vistas, and parking are not considered significant per SB 743. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if scenic resources would be damaged and/or removed by the development of a

project. The Project Site is currently improved with an existing two-story hotel, warehouse, and related surface parking. The Project Site is not bordered by or within the viewshed of a designated scenic highway. No natural scenic resources or unique geologic features exist on the Project Site.

While the buildings on the Project Site were constructed more than 50 years ago (between years 1940 and 1959), the *SurveyLA Historic Resources Survey Report* did not identify any of them as eligible for listing in the National Register of Historic Places, for listing in the California Register of Historical Resources, or as part of a historic district or Historic Preservation Overlay Zone.[13] As discussed in **Section 4.5, Cultural Resources,** the City Center Hotel sign located on the Project Site in association with the existing two-story hotel meets local criteria for potential eligibility as a local historic resource. Implementation of the Project would involve the removal and relocation of the City Center Hotel sign, to the outdoor deck area on site. In addition, based on the discussion in Section 4.1.a, the project's impact on visual resources, aesthetic character, light and glare, scenic vistas, and parking are not considered significant per SB 743. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur 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 Westlake area are commercial retail, office, restaurant, parking, residential, and mixed-use land uses ranging in various heights. The Project Site is permitted an unlimited height and a maximum FAR of 6.0:1 per the Central City West Specific Plan. However, because the Project qualifies for a 35 percent density bonus, it would have an allotted maximum FAR of 8.0:1. The building on the Project Site would be 26 stories and approximately 278 feet from the lowest adjacent grade to the top of the roof parapet. Development within the proximity of the Project Site ranges from low- to medium-rise in height. Directly northeast of the Project Site, located at 1100

13 Historic Resources Group, Inc., *SurveyLA Historic Resources Survey Report: Westlake Community Plan Area.* Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources (April 2014).

Wilshire Boulevard, is a high-rise building that is approximately 37 stories. Therefore, the massing and height of the proposed development would be consistent with other developments within the immediate view shed of the Project Site. The Project's impacts with respect to building height and massing would be less than significant.

Views

At a height of approximately 278 feet above grade, the mixed-use building would become a prominent part of the existing skyline and may be visible from private viewpoints within commercial or residential buildings in the Westlake area. 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. As such, the Project's impact on obstruction of scenic public views would be less than significant.

Landscape Plan

Environmental impacts to the character and aesthetics of the neighborhood would not result from the proposed open space and landscaping plan. Landscaping would be compatible with the surrounding area. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks would be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Architect and to the satisfaction of the decision maker. Impacts would be less than significant.

Vandalism

Environmental impacts may result from project implementation due to graffiti and accumulation of rubbish and debris along the wall adjacent to public right-of-way. However, every building, structure, or portion thereof would be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material, pursuant to LAMC Section 91.8104. In addition, the exterior of all buildings and fences would be kept free of graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.9104.15. Impacts would be less than significant.

Shade and Shadow

Shade and shadow impacts may result if direct sunlight to the proposed buildings affects adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the

sun. The Central City West Specific Plan requires a shade/shadow analysis for any project where C4(CW) lots may cast shadows on any R4(CW) or RC4(CW) lots for more than two (2) hours each day between the hours of 9 a.m. and 3 p.m. on the Winter Solstice, and 9 a.m. and 5 p.m. on the Summer Solstice. The Project Site is surrounded by C4(CW) Zoning to the north, east and south, and C4(CW) and R5(CW) to the west. Therefore, a Shade/Shadow Study is not required. However, the applicant has provided an analysis in order to demonstrate that any potential shade/shadow impacts related to the Project would be less than significant.

Based on a survey of the buildings within the potential shadow envelope of the Project, two shade-sensitive land uses were identified within the projected shadow patterns: the two multistory residential buildings directly to the west of the Project Site, which have a series of outdoor balconies and private windows along their east elevations, facing the Project to the east; and the hotel directly east of the Project Site, which has an outdoor pool area for its guests. The Project's winter solstice shadows from 9:00 AM to 4:00 PM are illustrated in **Figure 4.1-1, Winter Solstice Shadows**; and the Project's summer solstice shadows from 9:00 AM to 5:00 PM are illustrated in **Figure 4.1-2, Summer Solstice Shadows**.

West: To the immediate west of the Project Site are two multifamily apartment buildings ranging from 4 to 11 stories in height. As shown on **Figures 4.1-1** and **4.1-2**, the Project would shade these buildings in the early morning hours during all seasons. The four-story building would be most affected by shading of the Project between the hours of 9:00 AM and 11:00 AM during the winter months. The 11-story building would receive partial shading from the Project between the hours of 8:00 AM and 10:00 AM during the summer months. Because the shadow sensitive land use would be shaded for fewer than 3 hours a day throughout the year, the impact would not be considered significant.

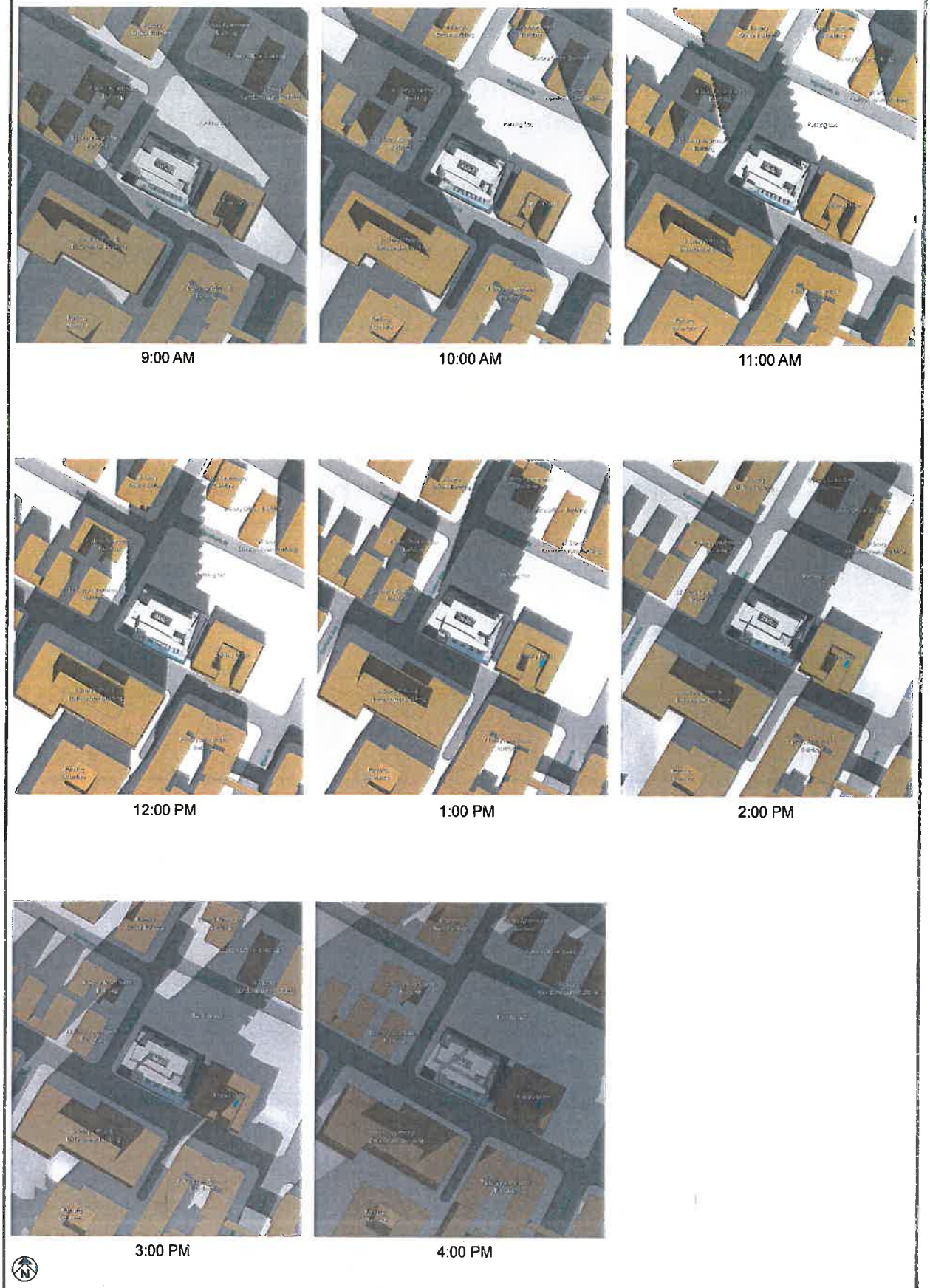
East: Directly adjacent to the east of the Project Site is the three-story hotel building. As shown in **Figures 4.1-1** and **4.1-2**, the Project would shade the hotel's outdoor pool area in the later afternoon during all seasons. In the winter months, the hotel building would be affected by shading of the Project after 4:00 PM. Shading on the outdoor pool area currently exists from the nine-story commercial office building across the street. In the summer months, the outdoor pool area would not be affected by shading of the Project until approximately 4:00 PM. Because the shadow-sensitive land use would be shaded for fewer than 3 hours a day throughout the year, the impact would not be considered significant.

South: To the south of the Project Site are a nine-story commercial office building and a seven-story residential mixed-use development. As shown in **Figures 4.1-1** and **4.1-2**, the Project would not shade any portions of these building during the year. Impacts would be less than significant.

North: North of the Project Site are a surface public parking lot, a three-story apartment building, a three-story office building, and a 37-story condominium building. As shown in **Figures 4.1-1** and **4.1-2**, the Project would shade portions of these buildings during only the winter months. The three-story apartment building along Ingraham Street and Lucas Avenue would be most affected by shade from the Project between the hours of 1:00 PM and 3:00 PM during the winter months. The 37-story condominium building would not be affected by shading from the Project until after 4:00 PM. Because the shadow sensitive land use would be shaded for fewer than three (3) hours a day throughout the year, the impact would not be considered significant.

As such, based on the discussion above, and pursuant to SB743, discussed in Section 4.1.a, impacts related to the existing visual character and quality of the project site and its surroundings would less than significant. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.



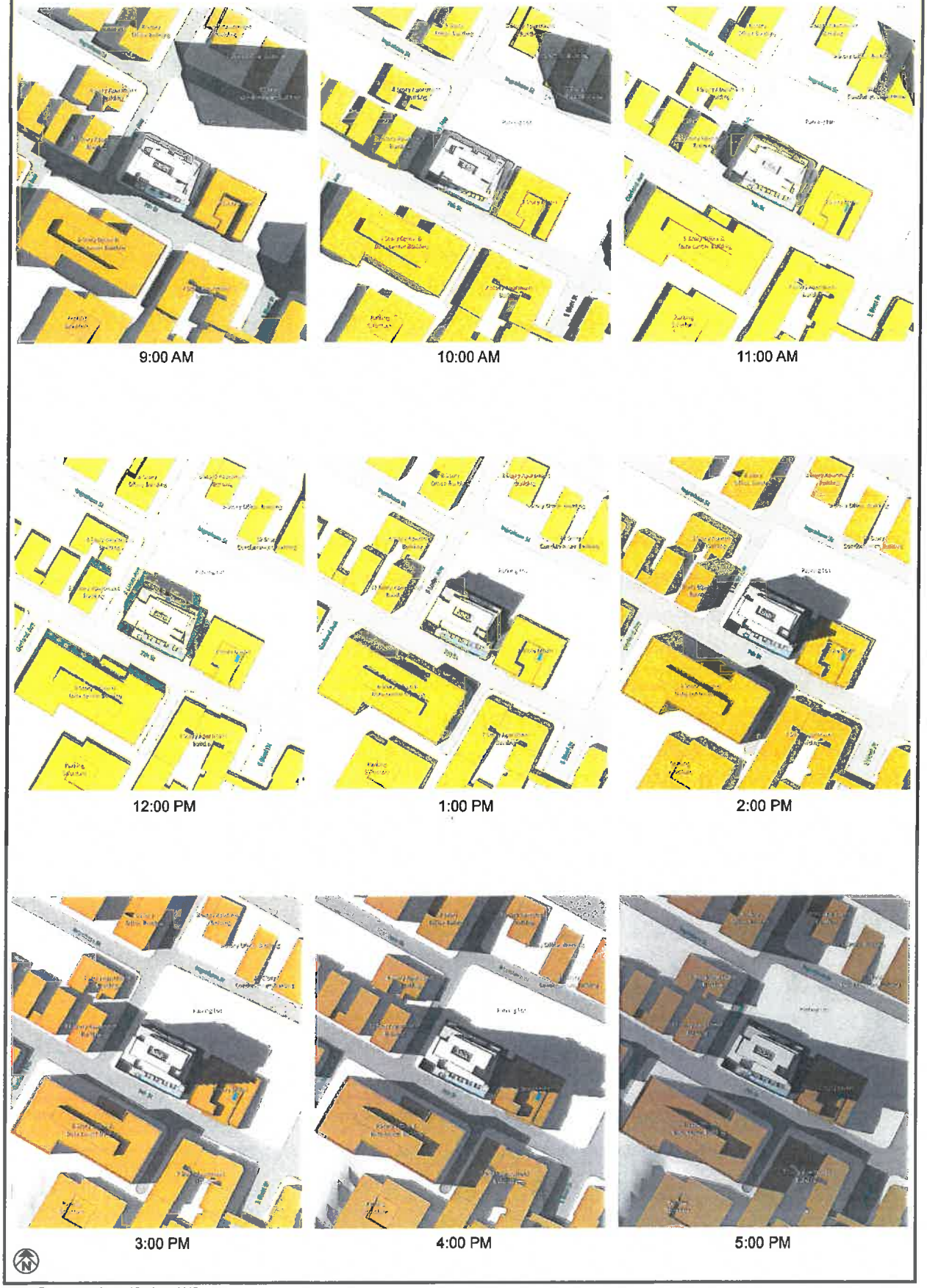
SOURCE: American General Design – 2015

FIGURE 4.1-1

Meridian Consultants

Winter Solstice Shadows

107-001-15



SOURCE: American General Design – 2015

FIGURE **4.1-2**

Meridian Consultants

Summer Solstice Shadows

107-001-15

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

Less than Significant Impact. A significant impact may occur 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of Project sources; and (b) the extent to which Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

Light

Night lighting for the Project would be provided to illuminate the building entrances and common open space areas, and largely to provide adequate night visibility for residents and visitors and to provide a measure of security. It should be noted that lights associated with the commercial buildings and surface parking lots and on the Project Site currently exist. The existing nighttime security lighting associated with the surface parking lot on the Project Site would be removed and replaced with new nighttime security for the new mixed-use building. The Project would include nighttime lighting along the building's frontages on 7th Street and Lucas Avenue. Lighting would also be placed at the building's pedestrian entrances and the vehicle driveways. In addition to the exterior ground-level nighttime security lighting, interior lighting associated with the Project would provide an additional source of nighttime illumination. Due to its close proximity with surrounding residential and commercial buildings, the Project would utilize outdoor lighting designed and installed with shielding to reduce light-sourced impacts surrounding the Project Site.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Project's architectural materials would include a mix of corrugated metal, metal paneling, metal guardrails, exposed concrete columns, and glass. Landscaping in the form of street trees would be provided along all street edges of the Project to buffer and partially screen the buildings from

public view. The Project would not introduce any new sources of glare that are incompatible with the surrounding areas.

In addition, based on the discussion in Section 4.1.a, the project's impact on visual resources, aesthetic character, light and glare, scenic vistas, and parking are not considered significant per SB 743. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact Analysis

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

No Impact. As shown on **Figure 2.0-2, Aerial Photograph of the Project Site**, the Project Site encompasses an existing two-story hotel building, warehouse, and related surface parking, and is surrounded by mixed-use residential and commercial office buildings, multistory residential buildings, surface parking lots, and commercial buildings. The Project Site is located within a developed and heavily urbanized area of the Westlake community within the City of Los Angeles. No farmland or agricultural activity exists on or within the vicinity of the Project Site. No portion of the Project Site is designated as "Farmland of Statewide Importance," "Unique Farmland," or "Farmland of Local Importance."[14] No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project 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 CCWSP and the LAMC, where the Specific Plan does not have related provisions. The Project Site is zoned C4(CW)-U/6 and

14 California Department of Conservation, Department of Land Resource Protection, *Los Angeles County Important Farmland 2010, Sheet 2 of 3* (January 2012).

has a land use designation of Regional Center Commercial in the Westlake Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[15] No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project Site is zoned C4(CW)-U/6 and has a land use designation of Regional Center Commercial in the Westlake Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project Site is occupied by an existing two-story hotel building, warehouse, and related surface parking. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

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

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15 California Division of Land Resources Protection, Williamson Act Program, ftp://ftp.consrve.ca.gov/ pub/dlrp /wa/2012%20Statewide%20Map/WA_2012.pdf.

State of California. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.3. AIR QUALITY

Impact Analysis

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may 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. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin ("Basin"), the applicable plan is the AQMP, which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the 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. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the SCAQMD on June 1, 2012. The 2012 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, reduce the high levels of pollutants in the Basin, meet federal and State air quality standards, and minimize the fiscal impact that pollution control measures have on the local economy. It builds on approaches taken from the previous AQMP for the attainment of the federal ozone air quality standard. These planning efforts have substantially decreased the population's exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin.

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. Because impacts with respect to population, housing, and employment would be less than significant, the Project would not conflict with the AQMP.

The potential for the proposed project to conflict with or obstruct the implementation of an air quality plan would be further reduced with the following applicable Regulatory Compliance Measures (RCM) as follows: **RC-AQ-1**, which requires demolition, grading and construction activities to be in compliance with SCAQMD standards and the provisions of District Rule 403; **RC-AQ-2** which, pursuant to Sections 2485 in Title 13 of the California Code of Regulations, limits the idling of all diesel-fueled commercial vehicles weighing over 10,000 pounds to five minutes at any location during construction; **RC-AQ-3** which, pursuant to Sections 93115 of Title 17 of the California Code Regulations, requires that the operation of any stationary, diesel-fueled, compression-ignited engines meet specified fuel and fuel additive requirements and emission standards; **RC-AQ-4** which, pursuant to SCQAMD Rule 1113, limits the volatile organic compound content of architectural coatings; **RC-AQ-5** which, pursuant to SCAQMD Rule 1138, requires the installation of odor-reducing equipment; and **RC-AQ-6** which, pursuant to SCAMD Regulation XIII, requires that new on-site nitrogen oxide emissions shall be minimized through the use of emission control measures. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, the Project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The Project would contribute to regional and localized air pollutant emissions during construction and Project operation. These emissions have the potential to exceed SCAQMD emissions thresholds.

Construction Emissions

The Project include demolition of the existing two-story hotel building, warehouse, and related surface parking on the Project Site; development includes construction of a new 26-story, mixed-use residential building and approximately 7,291 square feet of commercial space located on the ground floor. In addition, a total of 341 parking spaces would be provided by a six-level parking

structure, which would include one level of subterranean parking and consist of residential, guest, and commercial parking spaces.

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 25 months. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition/site clearing; (2) site preparation/grading; and (3) building construction. The building construction phase includes the construction of proposed buildings, connection of utilities to the buildings, laying of irrigation for landscaping, application of architectural coatings, paving, and landscaping of the Project Site.

The Project would contribute to regional and localized air pollutant emissions during construction (short term) and Project occupancy (long term). 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 2.5 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 analysis of daily construction emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD. **Table 4.3-1, Maximum Construction Emissions**, identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

Table 4.3-1
Maximum Construction Emissions (pounds/day)

Source	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum	64.97	11.27	26.15	0.05	3.37	1.24
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
*Notes: Refer to Modeling in **Appendix A.***
Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and 403.1, including watering disturbed areas a minimum of 3 times per day, replacing ground covers, and utilizing Tier 3 equipment.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gas; SOx = sulfur oxides.

These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403—Fugitive Dust. Specific Rule 403 control requirements include but are not limited to applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas; reestablishing ground cover as quickly as possible; utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site; and maintaining cover over exposed areas, which is required as Regulatory Compliance Measure (RCM) **RC-AQ-1** described in Section 4.3.a.

In addition, architectural coatings would comply with SCAQMD Regulation XI, Rule 1113—*Architectural Coating.* Rule 1113 provides specifications on painting practices as well as regulating the VOC content within paint. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Operational Emissions

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 4.3-2, Maximum Operational Emissions**.

Table 4.3-2
Maximum Operational Emissions (pounds/day)

Source	ROG	NOx	CO	SOx	PM10	PM 2.5
Maximum	10.32	9.25	55.11	0.13	8.39	2.44
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
*Notes: Refer to Modeling 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 operational generated uses that would be removed and the Project operational emissions.

As shown in **Table 4.3-2**, the operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may 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[16] 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 development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

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. The potential for the proposed project to result in a considerable net increase in criteria pollutants would be further reduced with the applicable Regulatory Compliance

16 CARB Area Designation Maps / State and National, http://www.arb.ca.gov/desig/adm/adm.htm

Measures (RCM) as described in Section 4.3.a, specifically **RC-AQ-2**, **RC-AQ-3** and **RC-AQ-6**. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Project construction activities and operations, as described previously, may increase air emissions above current levels. Also, concentrations of pollutants may have the potential to impact nearby sensitive receptors. 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 SCAQMD has developed localized significance thresholds (LSTs) based on the pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate lookup tables in the *Final Localized Significance Threshold Methodology* document prepared by the SCAQMD,[17] 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.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project are commercial uses to the south, multifamily apartment buildings to the west, and a commercial building, occupied by a hotel to the east. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82 feet) have been used to address the potential localized air quality impacts

17 South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology* (June 2003, Revised July 2008).

associated with the construction-related NOx, CO, PM10, and PM2.5 emissions for each construction phase.

Project Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table 4.3-3, Localized Significance Threshold (LST) Worst-Case Emissions**, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a 0.77-acre site in SRA 1. Table 4.3-3 also shows net operational emissions derived from subtracting estimated existing emissions from estimated Project emissions. Localized air quality impacts from construction activities to the off-site sensitive receptors would be less than significant.

Table 4.3-3
Localized Significance Threshold (LST) Worst-Case Emissions (pounds/day)

Source	NOx	CO	PM10	PM2.5
Construction				
Total mitigated maximum emissions	6.10	7.96	0.94	0.56
LST threshold	65.5	588	4.25	2.5
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational				
Area/energy emissions	0.54	19.33	0.14	0.14
LST threshold	65.5	588	2.0	0.75
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.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspots analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would increase the volume to capacity (V/C) ratio by two (2) percent or more. Based on a review of the *Traffic Study*, the Project would not meet these criteria for any of the studied intersections. The Project would not have the potential to cause or contribute to an

exceedance of the California one-hour or eight-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively, or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants (TAC)

Because the Project consists of a mixed-use development containing residential, retail, and restaurant uses, the Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or noncarcinogenic toxic air contaminants (TACs), and no toxic airborne emissions would typically result from Project implementation. In addition, construction activities associated with the Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to TACs at the regional, State, and federal levels that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of TACs would be less than significant.

The potential for the proposed project to result in a considerable net increase in criteria pollutants would be further reduced with the applicable Regulatory Compliance Measures (RCM) as described in Section 4.3.a. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Create objectionable odors affecting a substantial number of people?

Less than Significant with Project Mitigation. A significant impact would occur if objectionable odors occur that would adversely impact 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 the construction phase, activities associated with the operation of 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. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. The potential for the

proposed project to result in a considerable net increase in criteria pollutants would be further reduced with the applicable Regulatory Compliance Measures (RCM) as described in Section 4.3.a, specifically **RC-AQ-4** and **RC-AQ-5**. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **III-60** and **III-70** are proposed to reduce potentially significant impacts to a less than significant level.

III-60 Objectionable Odors (Commercial Trash Receptacles)

Environmental impacts may result from project implementation due to the location of trash receptacles near adjacent residences. However, these impacts will be mitigated to a less than significant level by the following measure:

- Open trash receptacles shall be located a minimum of 50 feet from the property line of any residential zone or use.
- Trash receptacles located within an enclosed building or structure shall not be required to observe this minimum buffer.

III-70 Objectionable Odors

Environmental impacts to adjacent residential properties may result due to objectionable odors from the proposed project. However, these impacts can be mitigated to a less than significant level by the following measures:

- No window openings or exhaust vents related to commercial uses shall be permitted on the building facade which abuts a residential use or zone.

4.4 BIOLOGICAL RESOURCES

Impact Analysis

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological

resources if it could result in: (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 two-story hotel building, warehouse, 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 Game (CDFG) or US Fish and Wildlife Service (USFWS). However, 10 on-site trees, and two off-site trees would be removed during construction. Given that nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA)[18] and the California Department of Fish and Wildlife Code,[19] implementation of the following mitigation measure will ensure that no significant impacts to nesting birds would occur. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **IV-20** is proposed to reduce potentially significant impacts to a less than significant level.

IV-20 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

The project will result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

- Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs

18 United States Code, tit. 33, sec. 703 et seq.; see also Code of Federal Regulations, tit. 50, pt. 10.
19 California Department of Fish and Wildlife Code, sec. 3503.

and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
  a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
  b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
  c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
  d. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

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

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, the Project would normally have a significant impact on biological resources if it could 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; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise and 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 two-story hotel building, warehouse, and related surface parking. No riparian or other sensitive natural community is located on or adjacent to the Project Site. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, the Project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is currently developed and covered with impermeable surfaces. The Project Site does not contain any wetlands or natural drainage channels, or have the potential to support any riparian or wetland habitat as defined by Section 404 of the Clean Water Act. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, the Project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in an area that has been previously developed in a heavily urbanized area of the Westlake 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.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide,* 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.[20] As stated before, several trees on the Project Site would be removed during construction, including four (4) Deodar Cedar trees, one (1) Orange tree, one (1) Sweetshade tree, three (3) ornamental Musaceae trees and one (1) ornamental shrub, on the project site; and two Trees of Heaven (Ailanthus Altissima) within the public right-of-way. These street trees do not consist of any protected tree species (i.e., valley oak, California live oak, Southern California black walnut, western sycamore, or California bay). The removal and placement of these trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Thus, the Project Applicant would comply with the following mitigation measures to ensure that no significant impacts to trees would occur. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **IV-80** and **IV-90** are proposed to reduce potentially significant impacts to a less than significant level.

IV-80 Tree Removal (Non-Protected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multitrunked, as measured 54 inches above the ground) nonprotected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

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

- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

IV-90 **Tree Removal (Public Right-of-Way)**

- Removal of trees in the public right-of-way requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way.
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

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

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

Mitigation Measures: No mitigation measures are required.

4.5 CULTURAL RESOURCES

Impact Analysis

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project would disturb historic resources that presently exist within the Project Site. The existing commercial buildings on the Project Site were constructed more than 50 years ago as follows: property address 1135 W 7th Street, between the years 1950 and 1959: and property addresses 1145 and 1147 W 7th Street, between the years 1940 and 1949.[21] However, these existing buildings on the Project Site are not identified in the 2014 *SurveyLA Historic Resources Survey Report: Westlake Community Plan Area,* and therefore would not be considered historic resources pursuant to CEQA.

The nearest historic resource or potentially historic resource is the City Center Hotel sign, which is associated with the existing two-story hotel located on the Project Site. While this resource does not meet significance thresholds for National Register or California Register eligibility, it does meet local criteria for potential eligibility as a local historic resource.[22] This historic resource is considered an example of a circa 1950 motel sign with neon lettering and incandescent bulbs.[23] It may exemplify design features of the post–World War II period, of which most of the essential character-defining features of its type are still retained.[24] Preservation of the City Center Hotel sign on the Project Site would not conform to the Project's design features; therefore, implementation of the Project would involve the removal and relocation of the historic resource. As part of the Project design, the City Center Hotel sign would be retained on site and located on the outdoor deck area above the ground-floor retail. It should also be noted that the next nearest historic resource is the Hotel Commodore building located west of the Project Site at 1201 W 7th Street, which is listed under the California Register of Historical Resources.[25] Construction and

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21 HistoricPlacesLA, *Los Angeles Historic Resources Inventory, City Center Hotel Sign,* http://www.historicplacesla.org/reports/71900bf3-bd1c-4bd1-9b3e-7fbd25025cc5, accessed September 2015.

22 The City Center Hotel sign is coded "5S3" which is a resource defined as "appears to be individually eligible for local listing or designation through survey evaluation."

23 HistoricPlacesLA, *Los Angeles Historic Resources Inventory, City Center Hotel Sign,* http://www.historicplacesla.org/reports/71900bf3-bd1c-4bd1-9b3e-7fbd25025cc5, accessed September 2015.

24 HistoricPlacesLA, *Los Angeles Historic Resources Inventory, City Center Hotel Sign,* http://www.historicplacesla.org/reports/71900bf3-bd1c-4bd1-9b3e-7fbd25025cc5, accessed September 2015.

25 Historic Resources Group, Inc., *SurveyLA Historic Resources Survey Report: Westlake Community Plan Area.* Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources (April 2014).

operation of the Project would not impact the adjacent Hotel Commodore building. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Project would disturb archaeological resources that presently exist within the Project Site. The Project Site has been subject to extensive grading related to previous episodes of development and redevelopment; therefore, the probability that significant and intact archaeological deposits exist on the Project Site is low. The Project would include one level of subterranean parking, which would require excavation to approximately 20 feet below grade. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, no further evaluation of this issue is warranted at this time.

However, as a precautionary measure, through Regulatory Compliance Measure (RCM) **RC-CR-2**, if any archaeological materials are encountered during the course of Project development, all further development activity be halted and the services of an archaeologist secured. The archaeologist would assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The report would contain recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, and the Project Applicant would comply with the recommendations of the evaluating archaeologist as contained in the survey, study, or report. Project development may resume once copies of the archaeological survey, study, or report are submitted to the South Central Coastal Information Center (SCCIC), located at California State University, Fullerton. The archaeologist's survey, study, or report would be submitted prior to the issuance of any building permit; and the applicant would submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the applicant to this condition would be recorded prior to issuance of a grading permit. If an archaeologist is needed, the Applicant would contact the SCCIC or a member of the Society of Professional Archaeologists (SOPA), or a SOPA-qualified archaeologist. Copies of the archaeological survey,

study, or report would be submitted to the SCCIC Department of Anthropology. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Project were to disturb paleontological resources or geologic features that presently exist within the Project Site. The Project Site has been previously graded and has been improved with paved surface parking lots and two commercial buildings. The Project would include one level of subterranean parking, which would require excavation to approximately 20 feet below grade.

However, as a precautionary measure, through Regulatory Compliance Measure (RCM) **RC-CR-3**, if any paleontological or unique geologic resources are encountered during the course of Project development, all further development activity be halted and the services of a paleontologist secured. The paleontologist would assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The report would contain recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource and the Project Applicant would comply with the recommendations of the evaluating paleontologist as contained in the survey, study, or report. Project development may resume once copies of the report are submitted to the Los Angeles County Natural History Museum. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related, significant adverse effect could occur if grading or excavation activities associated with the Project would disturb previously interred human remains. No known human burials have been identified on the Project Site. However, it is possible that unknown human remains could occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

In the event that human remains are discovered during excavation activities, the following procedure would be observed as required by Regulatory Compliance Measure (RCM) **RC-CR-4**; excavations would immediately stop and the County Coroner would be contacted. The Coroner would have 2 working days to examine human remains after being notified by the responsible person. If the remains were found to be Native American, the Coroner would have 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent would have 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 descendent does not make recommendations within 48 hours the owner would reinter the remains in an area of the property secure from further disturbance, or; if the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

4.6 GEOLOGY AND SOILS

Impact Analysis

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

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project Site 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 and Exhibit A of the City of Los Angeles Safety Element.[26] Additionally, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, nor do any known active

26 City of Los Angeles General Plan, Safety Element (1990).

faults cross the Project Site. The potential risk for surface fault rupture through the Project Site is considered low. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Strong seismic ground shaking?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the 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. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the site-response characteristics. As previously discussed, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting. The Project Site is located above the Puente Hills (LA) blind thrust fault and does not present a surface rupture hazard.

The potential for seismically induced settlement at the Project Site is considered small, and the geotechnical conditions are favorable for foundations and the permanent retaining structure. In addition, the potential for exposing people or structures to seismic risks would be reduced with the following applicable Regulatory Compliance Measure (RCM) **RC-GEO-1**, which requires that the design and the construction of the project conform to the California Building Code seismic standards as approved by the Department of Building and Safety. In addition, the proposed project would also be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG) Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California (1997), which provides guidance for the evaluation and mitigation of earthquake-related hazards. The Project would also conform to all applicable provisions of the California Building Code with respect to new construction. 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. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project Site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to the buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grain, cohesionless soils and tends to occur within the upper 50 feet of the ground surface.

According to the California Division of Mines and Geology (CDMG) Seismic Hazard Zones Map of the Hollywood Quadrangle[27] and Exhibit B of the City of Los Angeles Safety Element,[28] the Project Site is not located within a potential liquefaction zone. A review of the Seismic Hazard Zone Report for the Hollywood Quadrangle indicates that the historical high groundwater level is greater than 50 feet below ground surface (bgs) at the Project Site.[29] A *Geotechnical Report* was prepared by Advance Geotechniques on October 10, 2014, for the construction of a residential and commercial complex including a 25-story hotel; a three-story market over four levels of parking; and 10 story residential building structure over one basement level of parking. While the project work scope differs, the analysis of the existing conditions remain the same. Based on this Report, the soils on the Project Site are not characterized as loose, water-saturated, and granular sediments[30], which are characteristics likely to make a site susceptible to liquefaction-induced impacts. As such, the Project Site would not be subject to liquefaction. The Project would comply with Los Angeles Building Code provisions for soil preparation to minimize hazards from liquefaction and other seismically related ground failures. The potential for exposing people or structures to seismic risks would be further reduced with the following applicable Regulatory Compliance Measure (RCM) **RC-GEO-4**, which requires that prior to the issuance of grading or building permits, the applicant shall 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 strength loss, estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include but are not limited to ground stabilization, selection of appropriate

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27 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).

28 City of Los Angeles General Plan, Safety Element (1990).

29 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).

30 Report of Geotechnical Investigation, Proposed Commercial Development Project 1135-1147 7th Street Los Angeles, CA, Advanced Geotechniques, October 10, 2014

foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, and as it may be subsequently amended or modified. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Landslides?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, the Project would normally 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 located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the CDMG Seismic Hazard Zones Map of the Hollywood Quadrangle[31] and Exhibit C of the City of Los Angeles Safety Element,[32] the Project Site is located on relatively level terrain and is not located in a designated earthquake-induced landslide hazard zone. Therefore, the probability of landslides, including seismically induced landslides, is considered to be very low. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impacts if it would (a) constitute a geologic hazard to other properties by causing or accelerating instability 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.

The Project proposes to export approximately 50,000 cubic yards of soil. Although development of the Project has the potential to result in the erosion of soils during site preparation and

31 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).

32 City of Los Angeles General Plan, Safety Element (1990).

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. In addition, minor amounts of erosion and siltation could occur during grading and the potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the Project Site; furthermore, the Project Site would be mostly paved over or built upon, so little soil would be exposed.

Nevertheless, all grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS), which complies with the requirements and standards designed to limit potential impacts to acceptable levels. In addition, 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. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **VI-20** and **IV-40** are proposed to reduce potentially significant impacts to a less than significant level.

VI-20 Erosion/Grading/Short-Term Construction Impacts

Short-term erosion impacts may result from the construction of the proposed project. However, these impacts can be mitigated to a less than significant level by the following measures:

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

VI-40 Grading (20,000 Cubic Yards, or 60,000 Square Feet of Surface Area or Greater)

Impacts will result from the alteration of natural landforms due to extensive grading activities. However, this impact will be mitigated to a less than significant level by designing the grading plan to conform with 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 Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:

- A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report

weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.

- "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.
- "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.
- Movement and removal of approved fencing shall not occur without prior approval by LADBS.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally 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 may 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 low. Furthermore, 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 (Building Code). Code requirements to prevent soil erosion and liquefaction would be implemented. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards 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 may occur if the 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 two commercial buildings and surface parking lot and it is anticipated that the Project Site is comprised of artificial fill materials to support this existing development. Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, which includes building foundation requirements appropriate to site-specific conditions. While the Project Site is not expected to contain expansive soils that would potentially create substantial risks to life or property, the potential for create substantial risks to life or property would be further reduced with the applicable Regulatory Compliance Measure (RCM) **RC-GEO-4**, described in Section 4.6.a.iii. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Impacts would not occur.

Mitigation Measures: No mitigation measures are required.

4.7 GREENHOUSE GAS EMISSIONS

Impact Analysis

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

Less than Significant Impact with Project Mitigation. A significant impact would occur if the 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. Although scientists disagree as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that a direct link exists between increased emission of GHGs and long-term global temperature.

The principal GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e).

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB), the State agency charged with regulating Statewide air quality, to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020.

As a central requirement of AB 32, the CARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. The Scoping Plan, which was developed by CARB in coordination with the Cap-and-Trade program, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. As required by AB 32, CARB must update its Scoping Plan every 5 years to ensure that California remains on the path toward a low-carbon future.

CARB updated the Scoping Plan in May 2014 through a *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document* (FED or 2014 "Scoping Plan"). CARB's updated projected "business as usual" (BAU) emissions in the 2014 Scoping Plan are based on current economic forecasts (i.e., as influenced by the economic downturn) and certain GHG reduction measures already in place. The BAU projection for 2020 GHG emissions in California was originally estimated to be 596 MMTCO2e. The updated calculation of the 2014 Scoping Plan's estimates for projected emissions in 2020 totals 509 MMTCO2e. Considering the updated BAU estimate of 509 MMTCO2e by 2020, CARB estimates that the State would have to reduce GHG emissions by 21.6-percent from BAU without Pavley regulations, which reduce GHG emissions in new passenger vehicles and the 33 percent renewable portfolio standard (RPS); or 15.7 percent from the adjusted baseline (i.e., with Pavley regulations and 33 percent RPS) to return to 1990 emission levels (i.e., 427 MMTCO2e) by 2020, instead of the 28.35 percent BAU reduction previously reported under the Scoping Plan.[33]

The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

There are no federal, State, or local adopted thresholds of significance for addressing a residential project's GHG emissions. Furthermore, neither the SCAQMD nor the CEQA Guidelines Amendments adopted by the Natural Resources Agency on December 30, 2009, provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of GHG emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

33 California Air Resources Board (CARB), Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED) (May 2014), Attachment D, p. 11.

In addition, as a central component of the CEQA Guidelines, substantial evidence supports that compliance with the LA Green Building Code is qualitatively consistent with Statewide goals and policies in place for the reduction of GHG emissions, including AB 32 and the corresponding Scoping Plan. The City adopted the LA Green Plan to provide a Citywide plan for achieving the City's GHG emissions targets, for both the existing and future generations of GHG emissions. To further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code as it applies to new development projects. With respect to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines stricter GHG reduction measures available to development projects in the City of Los Angeles. Among the many GHG reduction measures outlined later in this section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; to meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and to meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development Project that can demonstrate that it complies with the LA Green Building Code is considered consistent with Statewide GHG reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

Construction

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered project generated. As explained by the California Air Pollution Control Officer's Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from the manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (CEQA Guidelines, Section 15145). Therefore, the construction analysis does not consider such GHG emissions.

All GHG emissions are reported on an annual basis. Emissions of GHGs were calculated using CalEEMod for each year of construction of the Project. The results of this analysis are presented in **Table 4.7-1, Proposed Project Construction-Related Greenhouse Gas Emissions**. As

shown in **Table 4.7-1**, the greatest annual increase in GHG emissions from construction activities would be 546.29 metric tons in 2018.

Table 4.7-1
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO2e Emissions (Metric Tons per Year)[a]
2017	193.79
2018	546.29
2019	143.96
Total Construction GHG Emissions	**884.04**
Annualized over Project's Lifetime	**29.47**

[a] *Construction CO_2 values were derived using CalEEMod Version 2013.2.2.*
*Note: Calculation data and results are provided in **Appendix A** of this Initial Study.*
**N2O emissions account for 0.04 MTCO2e/year.*
For comparative purposes, SCAQMD recommends that construction-related GHG emissions be amortized over the assumed operational lifetime of a project, which is recommended by SCAQMD as 30-years.

Operation

The GHG emissions resulting from operation of the Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, hearth combustion, and the generation of solid waste and wastewater, were calculated assuming compliance with the LA Green Building Code. The estimated emissions from exiting uses on the site were subtracted from the estimated emissions resulting from the Project in order to calculate a potential net change in emissions. Emissions of operational GHGs are shown in **Table 4.7-2, Proposed Project Operational Greenhouse Gas Emissions.** As shown, the increase in GHG emissions generated by the Project with GHG reduction measures would be **2,369.28** MTCO2e per year. The net increase in GHG emissions generated by the Project without GHG reduction measures would be 478.35 MTCO2e. This represents an approximately 16.8 percent reduction in GHG emissions as a result of the implementation of the LA Green Building Code and proximity to transit. The Project is required to comply with the LA Green Building Code.

Table 4.7-2
Proposed Project Operational Greenhouse Gas Emissions

GHG Emissions Source	Emissions ($MTCO_2e$/year)
Construction (amortized)	29.47
Operational (mobile) sources*	1,436.95
Area sources	4.15
Energy	765.84
Waste	-0.22
Water	133.09
Annual Total	**2,369.28**

Source: CalEEMod.
*Notes: Emissions calculations are provided in **Appendix A.***
Construction emissions are shown in Table 4.7-1 on the previous page.
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 0.06 MTCO2e/year.*

As shown in **Table 4.7-2,** the Project's reduction in GHG emissions is consistent with Statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. The Project's proximity to transit (located approximately 0.4 miles west from MTA's 7th Street/Metro Center Station) and design features would serve to reduce the Project's GHG emissions by up to 16.8 percent. Based on these factors, the Project would be consistent with the intent of both AB 32 and SB 375, as previously discussed, with respect to reducing mobile source emissions associated with the Project's trip generation. Therefore, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **VII-10** is proposed to reduce potentially significant impacts to a less than significant level.

VII-10 Greenhouse Gas

Environmental impacts may result from project implementation due to increased greenhouse gas emissions. However, the impact can be reduced to a less than significant level though compliance with the following measure(s):

- Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable.

- To encourage carpooling and the use of electric vehicles by Project residents and visitors, at least twenty (20)% of the total code-required parking spaces provided for all types of parking facilities, but in no case less than one location, shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20% results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

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

Less than Significant Impact. The goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. In addition, Executive Order S-3-05 aims to reduce Statewide GHG emissions to 80 percent below 1990 levels by 2050.

As described previously, through required implementation of the LA Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The Project's generation of GHG emissions would not make cumulatively considerable contribution to conflicting with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Impact Analysis

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

Less than Significant Impact with Project Mitigation. The Project would not result in the routine transport, use, or disposal of hazardous materials. Construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. However, 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 with mitigation incorporated.

Mitigation Measures: Mitigation Measure **VII-50** is proposed to reduce potentially significant impacts to a less than significant level.

VIII-50 Human Health Hazard (Vector Control)

- The property shall be maintained in a neat, attractive, and safe condition at all times.
- On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties.
- Trash and Recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times.
- Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter.
- Trash and garbage collection containers shall be emptied a minimum of once per week.
- Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris.

b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset*

and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact.

Household Products

By far the most common hazardous materials are those found or used in the home. Waste oil is a common hazardous material that is often improperly disposed of and can contaminate surface water through runoff. Other common household hazardous wastes (used paint, pesticides, cleaning products, and other chemicals) are often improperly stored in garages and homes. Because of their prevalence and proximity to residents, household products constitute the most pervasive health hazard facing residents of the community.

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 one percent and easily crumbled (friable). Based on the age of the on-site buildings (built prior to 1970), there is a potential for asbestos-containing building materials at the Project Site. As such, under Regulatory Compliance Measure (RCM) **RC-HAZ-1**, prior to the issuance of any permit for the demolition of alteration of the existing structure(s), the applicant would provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACMs) are present in the building. If ACMs are found to be present, they will need to be abated in compliance with the SCAQMD's Rule 1403 and all other applicable State and Federal rules and regulations. Impacts would be less than significant.

Lead-Based Paint

Although lead-based paint has been taken off the market, it is estimated that 80 percent of buildings built prior to 1978 contain lead paint. Based on the age of the on-site buildings, there is a potential for lead-based paint at the Project Site. As such, under Regulatory Compliance Measure (RCM) **RC-HAZ-1**, prior to issuance of any permit for the demolition or alteration of the

existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Impacts would be less than significant.

Methane Gas

According to the City of Los Angeles Methane Zone map,[34] the Project Site is not located within a methane or methane buffer zone. No impacts would occur.

Radon

According to the Radon Potential Zone Map for Southern Los Angeles County, California,[35] the Project Site is not located within a radon zone. No further investigations related to potential exposure to radon gas would be required. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) 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. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health

34 City of Los Angeles Methane Zone Map (2004). http://methanetesting.org/PDF/LA_MethaneZones.pdf.

35 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.

hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The closest schools to the Project Site are the Los Angeles Unified School District's Esperanza Elementary School, located at 680 Little Street; and the Olympic Primary Center, located at 950 Albany Street. The two schools are located approximately 0.35 miles northwest and southwest of the Project Site, respectively. 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.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. The Project Site currently contains two two-story commercial buildings and related surface parking lots. These buildings are utilized for uses consisting of hotel and lodging and commercial manufacturing uses. No aboveground storage tanks (ASTs) were observed at the Project Site, nor was there any indication of underground storage tank (USTs) on the Project Site. Seven leaking underground storage tank (LUSTs) are located within one-quarter mile of the Project Site, four of which have been remediated and closed as of 1996; the other three are permitted by the City of Los Angeles.[36] Based on the distance or proximity to the Project Site and the status of the cases, these properties are not considered to pose a significant effect. Additionally, the California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. EnviroStor also provides information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted, or have been completed under DTSC's oversight. A review of EnviroStor did not

36 State Water Resources Control Board, *GeoTracker,* http://geotracker.waterboards.ca.gov/, accessed September 2015.

identify any records of hazardous waste facilities on the project site. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The closest public airport to the Project Site is the Santa Monica Municipal Airport. However, this airport is not located within two miles of the Project Site. Additionally, the Project Site is not in an airport hazard area. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project is not within the vicinity of a private airstrip and not within an area that would expose residents and workers to a safety hazard. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new (or interfere with an existing) emergency response or evacuation plan, and the severity of the consequences.

The Project is located at the intersection of 7th Street and Lucas Avenue, neither of which is a selected disaster route as identified by the City's General Plan.[37] However, Good Samaritan Hospital, located at 1225 Wilshire Boulevard, is approximately 0.14 miles north of the Project Site. Development of the Project Site may require temporary and/or partial street closures due to construction activities. Such closures would be temporary and would have 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; especially with regard to minimizing inhibited access to the Good Samaritan Hospital. Additionally, prior to the issuance of a building permit, the applicant shall develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan shall include, but not be limited to, the following: mapping of emergency exits; evacuation routes for vehicles and pedestrians; and documentation of and routes to nearest hospitals and fire departments. Additionally, the nearest designated emergency route to the project site is Figueroa Street, approximately 0.30 miles to the southeast; and Alvarado Street, approximately 0.75 miles to the northwest according to Exhibit H of the City of Los Angeles Safety Element.[38] Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **VIII-80** is proposed to reduce potentially significant impacts to a less than significant level.

VIII-80 Emergency Evacuation Plan (Building over 75 feet in height)

Environmental impacts may result from project implementation due to limitations of emergency response equipment. However, these potential impacts will be mitigated to a less than significant level by the following measure:

- Prior to the issuance of a building permit, the applicant shall develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

h. Would the project expose people or structures to a significant risk of loss, injury or death involving wildland

37 *City of Los Angeles Safety Element*, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.
38 City of Los Angeles General Plan, Safety Element (1990).

fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is located in a highly urbanized area of the Westlake 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).[39] No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.9 HYDROLOGY AND WATER QUALITY

Discussion

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with 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 compliance with 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

39 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org, accessed September 2015.

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 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 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. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Operation Impacts

Similar to the existing uses on the Project Site, the Project would continue to generate surface water runoff. The Project Site is completely covered with impervious surfaces. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the site. Potential impacts to surface water runoff would be mitigated to a level of insignificance by incorporating stormwater pollution control measures. As noted, 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.

The potential for violations of water quality standards and waste discharge requirements would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-1**, which requires that all wastewater from the project be treated according to requirements of the National Pollutant Discharge Elimination System (NPDES) as authorized by the LARWQCB; and that a Storm Water Pollution Prevention Plan (SWPPP) implement construction Best Management Practices (BMP) to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in storm water runoff as a result of construction activities; **RC-WQ-3**, which requires the Applicant to submit a Low Impact Development (LID) Plan and/or Standard Urban Storm water Mitigation Plan (SUSMP) to the City of Los Angeles Bureau of Sanitation (BOS) Watershed Protection Division for review and approval, and the LID Plan and/or SUSMP which shall be prepared consistent with the requirements of the Development Best Management Practices (BMP) Handbook; and **RC-WQ-4**, which requires that a BMP be designed to retain or treat the runoff from a storm event within the Development BMP Handbook Part B Planning Activities. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (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 Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Review of the Seismic Hazard Zone Report for the Hollywood Quadrangle indicates that the historical high groundwater level is greater than 50 feet below ground surface (bgs) at the Project Site.[40] The Project would excavate soils beneath the site to a depth of approximately 20 feet below grade and would not impact the groundwater table. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Furthermore, the Project Site is located 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 100 percent impervious, so implementation of the Project would not increase site runoff or result any changes in the local drainage patterns. The potential to alter an existing drainage pattern would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-3** and **RC-WQ-4**, as described in Section 4.9.a. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

40 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).

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

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project would 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, especially given the fact that the existing Project Site is already 100 percent impervious. The potential to alter an existing drainage pattern would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-3** and **RC-WQ-4**, as described in Section 4.9.a. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

e. *Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?*

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with 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.

As noted, the Project Site is currently 100 percent impervious, and all surface water is directed off site to the adjacent 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. 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. The potential to exceed the storm water drainage system capacity would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-3** and **RC-WQ-4**, as described in Section 4.9.a. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. Would the project otherwise substantially degrade water quality?

Less than Significant Impact. A significant impact may occur if the Project includes sources of water pollutants that would have the potential to substantially degrade water quality. Construction of the Project, such as grading and excavation activities, could potentially degrade water quality through erosion and subsequent sedimentation. However, the implementation of BMPs and compliance with all federal, State, and local regulations governing stormwater discharge would reduce the impacts of the Project on surrounding water quality. The potential for water quality degradation would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-1**, **RC-WQ-3** and **RC-WQ-4**, as described in Section 4.9.a. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if the Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood that results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to Exhibit F of the Safety Element of the City's General Plan, the Project Site is not located within a designated flood

zone.[41] Therefore, the Project would not place housing within a 100-year flood hazard area. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area. The Project Site is located in a highly urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project; therefore, the Project would not have the potential to impede or redirect floodwater flows. Furthermore, according to Exhibit F of the Safety Element of the City's General Plan, the Project Site is not located within a designated flood zone.[42] No impact would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may 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, including but not limited to a seismically induced seiche. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Based on the lack of such large enclosed water bodies nearby, seiches and tsunami risks are considered nil. Therefore, 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.

Mitigation Measures: No mitigation measures are required.

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41 City of Los Angeles General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, (1996).

42 City of Los Angeles General Plan, Safety Element, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, (1996).

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

No Impact. 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 surrounded by urban development; therefore, it does not contain any sources of mudflow. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.10 LAND USE AND PLANNING

Impact Analysis

a. Would the project physically divide an established community?

No Impact. A significant impact may occur if the Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Project.

The Project Site is located within an urbanized area of the Westlake Community Plan and is consistent with the existing physical arrangement of the properties within the vicinity of the site. Surrounding uses include a nine-story commercial office building and a seven-story mixed-use residential development to the south across 7th Street; a surface public parking lot to the north two multifamily apartment buildings to the west across Lucas Avenue, and a three-story commercial building, occupied by a hotel to the east. As such, no separation of uses or disruption of access between land use types would occur as a result of the Project, nor would implementation of the Project disrupt or divide the physical arrangement of the established community. As such,

no separation of uses or disruption of access between land use types would occur as a result of the Project, nor would implementation of the Project disrupt or divide the physical arrangement of the established community. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project conflict with an 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?

Less than Significant. A significant impact may occur if the Project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects that 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 and zoning plans. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated Metropolitan Planning Organization (MPO). The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the Westlake Community Plan, the Central City West Specific Plan and the LAMC, where the Specific Plan does not have related provisions, which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan. The Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. As mentioned, the SCAQMD's AQMP was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin,

which is a nonattainment area.[43] The Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. As noted in **Section 5.3, Air Quality**, the Project would not exceed the daily emissions thresholds during the construction or operational phases. The Project would be consistent with the AQMP. Furthermore, because the site is adjacent to the 110 Freeway, the applicant has been notified of Zoning Information bulletin No. 2427, Freeway Adjacent Advisory Notice for Sensitive Uses, which became effective November 8, 2012 and is applicable to properties Citywide that are within 1,000 feet of a freeway. The advisory policy advises applicants seeking discretionary actions of conditions and design alternatives to lessen the effects of air pollution exposure. In addition, the Council recently adopted the Clean Up Green Up Ordinance, effective June 4, 2016. This Ordinance requires buildings located within 1,000 feet of a freeway to provide regularly occupied areas of the building with air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value (MERV) of 13, under Section 99.04.504.6 is added to Division 4 of Article 9 of Chapter 9 of the Los Angeles Municipal Code. Therefore, in conjunction with the recommended mitigation measures and existing regulations, impacts to ambient air quality for residents will be reduced to a less than a significant level.

SCAG Regional Comprehensive Plan. The Project Site is located within the six-county region that makes up the SCAG planning area. The SCAG 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. 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 be consistent with policies set forth in the RCP because it would redevelop an existing surface parking lot and underutilized commercial property with a high-density, multifamily residential development with Project-serving retail uses, thereby maximizing a property that is easily accessible to mass transit and that is least likely to cause an adverse environmental impact. Furthermore, as discussed in section **4.13 Population and Housing,** the Project would add approximately 241 residential units in the Westlake Community Plan area, generating as many as 752 new residents, which is consistent with SCAG growth projections.

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43 Air Quality Management District (AQMD), *Final 2012 Air Quality Management Plan,* http://www.aqmd.gov/aqmp/2012aqmp/Final/index.html.

Local Plans

City of Los Angeles General Plan. The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: 10 Citywide elements (Plan for a Healthy Los Angeles, Framework, Air Quality, Conservation, Housing, Noise, Open Space, Service Systems/Public Recreation Plan, Safety and Mobility) and the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas.

The elements that would be most applicable to the Project are the Air Quality Element, Framework Element, Housing Element, Mobility Element and the Westlake Community Plan. Analysis of these elements follows.

Air Quality Element

The Project would comply with SB 375 and AB 32 by contributing to a reduction in GHG emissions through integrated land use, housing, and transportation planning. The key component of GHG emissions is the reduction of emissions from passenger vehicles, which represents about one-third of overall GHG emissions in the United States. Land use is among the top strategies to reduce such emissions. Compact development, which includes a mix of land uses, access, and proximity to transit, and concentrations of population and/or employment, can reduce congestion, lower infrastructure costs, and reduce household expenses related to transportation and energy, according to a 2010 report published by the Urban Land Institute.[44] The key to successful compact development is a land use pattern that has a high-quality pedestrian network and a variety of land uses within walking distance of one another.[45]

The Project's location is approximately 0.40 miles west of an existing Metro station and close to numerous bus lines and mixed land uses (including housing and employment). In addition, existing uses within walking distance include various community grocery stores, the LA Live entertainment complex, the Grammy Museum, Staples Center, the Los Angeles Convention Center, Grand Hope Park, fitness gyms, schools, restaurants, coffee shops, a Wells Fargo bank, and office buildings. As such, the Project would conform to the Air Quality Element. However, adverse impacts on future occupants may result from project implementation because of existing diminished ambient air pollution levels in the project vicinity, and an air filtration system would be

44 Urban Land Institute, The Role Compact Development Can Play in Reducing Green House Gas Emissions, Evidence from Three Recent Studies (2010).

45 Urban Land Institute (2010).

installed and maintained to reduce impacts to a less than significant level. Air filtration filters would meet or exceed the ASHRAE Standard 52.2 and Minimum Efficiency Reporting Value (MERV) of 13, in accordance with the standards provided by the Department of Building and Safety, which is required as a mitigation measure. The potential for the proposed project to result in a considerable net increase in criteria pollutants would be further reduced with the applicable Regulatory Compliance Measures (RCM) as described in Section 4.3.a. Impacts would be less than significant with project mitigation.

Framework Element

The Framework Element of the General Plan contains land use guidance for the entire City. The Framework 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 Framework's policies encourage the preservation of existing residential neighborhoods and advocates for growth in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations.

The Project Site is shown as within a Regional Center, defined as "a focal point of regional commerce, identity and activity and containing a diversity of uses." The 241 residential units and the retail uses proposed are the type of development encouraged by the City for Regional Centers because it places new transit-oriented development in a commercial and high-density residential area while preserving the surrounding neighborhoods adjacent to the area. The Framework Element states that a considerable mix of uses be accommodated to provide population support and enhance activity near the stations. This may encompass a range of retail commercial, offices, personal services, entertainment, restaurants, and housing that serve both transit users and local residents.

The Project would provide jobs and housing for professional workers in a redevelopment area of Westlake. The on-site commercial would be designed to attract and increase pedestrian activity by facing the 7th Street frontage. Interest at the street level would be further created by maintaining retail frontage along building edges. Future residents and retail workers would be approximately 0.40 miles, or just a few minutes of walking time, from the existing Metro station. The convenience of the Project's location near transit would be an incentive for many people to use public transportation.

As the Project Site would be located near existing bus stops and the Metro Red and Purple Lines, it would reduce the need for automobile trips and miles traveled and would increase public transit ridership. The Project's mix of land uses, such as housing and employment, works to reduce trips. As a result, the Project would accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors. The construction of 241 units of new housing and the addition of 7,291 square feet of commercial space in this specific location would significantly increase the livability and economic activity in the Westlake neighborhood. As such, the Project would conform to the Framework Element.

Housing Element

As stated in the Framework Element, the City of Los Angeles has an insufficient number of vacant properties to accommodate the cumulative amount of population growth that has been forecasted. The supply of land zoned for residential development is the most constrained in the context of population growth forecasts. Thus, should growth and new development in the City occur, it will most likely require the recycling and/or intensification of existing developed properties or conversion of certain uses. The Project is the redevelopment of an underutilized property (surface parking lots) with a mix of land uses.

The Project would provide 241 multifamily residential units and 7,291 square feet of commercial space that would be close to a multitude of public transit options in a dense urban commercial area. The Project is the type of new housing desired by the City. In addition, the Project would offer the residents who live in the surrounding apartments and condominium buildings useable open space areas and new venues for eating, shopping, and socializing. The Housing section of the Framework Element states that the improvement of the jobs and housing relationships in subareas of the City may be accomplished through the reuse of commercially zoned corridors and development at transit stations that afford the opportunity for the development of a mix of uses, including housing, local retail, and creative offices, and that can improve localized jobs and housing relationships. The Project represents this vision, and unites good planning practices by integrating housing with a mix of land uses and transportation nearby.

According to the City's adopted Housing Element 2013–2021, the City of Los Angeles will need a variety of housing units to accommodate evolving household types and sizes. The City has continuously gained residents since its founding and is expected to have 4,320,600 residents by 2035. Households without children, especially those headed by householders ages 55 and older, are expected to increase in the next decade. More than half (55.3 percent) of the City's households have only one or two persons, according to the 2010 Census. The City has been

pursuing a sustainable strategy for long-term growth, which encourages growth in higher-intensity commercial and mixed-use districts, centers, and boulevards and in proximity to transit. The Project would assist in proving long-term growth with higher density and, as such, would conform to the Housing Element.

Mobility Element

The Mobility Element of the General Plan contains policies related to safety, quality, access, choice and sustainability in transportation infrastructure. The Project is in close proximity to three major transportation corridors (Wilshire Boulevard, 7th Street, and 8th Street) that provide substantial public transit opportunities and facilities, including Metro Bus lines 20, 66, 51/52/352, 481, and 487/489.[46] The City's Mobility Plan indicates that 7th Street is designated to feature Tier 1 Protected Bicycle Lanes and also depicted as targeted for pedestrian safety enhancements. The Project includes dedication to ensure that surrounding roads and sidewalks can meet standards established in the Mobility Plan and the City's Complete Streets Manual. The development of the Project with residential, commercial, and retail uses would promote ground-floor pedestrian activity and circulation; create direct pedestrian connections between the new Project and the existing Metro transit infrastructure; and conform to the Mobility Element's policies and objectives.

Westlake Community Plan

The Project Site is located within the Westlake Community Plan area.[47] Therefore, all on-site development activity is subject to the land use regulations of the Westlake Community Plan. The Community Plan goals and objectives include providing organized growth, a Westlake identity, and a full range of housing choices for employees and residents in the downtown area. As described in the Community Plan, the redevelopment area offers an opportunity to focus development with the intention of connecting the major centers of the City by a rapid transit network. Also, the Community Plan encourages the balance of high-intensity commercial and residential uses within downtown Los Angeles, particularly near surrounding transit facilities. The Community Plan notes that the Central City Specific Plan Area is a major opportunity development site to provide for the generation of new jobs to improve the economic and physical condition of the area. The Project would place a mixed-use residential/retail development in an underutilized area of Westlake that is convenient to public transportation and also walkable to commercial

46 *Metro.net Bus and Rail system map*

47 City of Los Angeles Department of City Planning, Westlake Community Plan (1993).

centers. These aspects of the project are compatible with the goals and policies of the Westlake Community Plan. The inclusion of affordable units in the Project also supports the Westlake Community Plan policies.

Central City West Specific Plan

As noted previously, the Project Site is located within the Wilshire Corridor District of the Central City West Specific Plan, which is also known as the South Subarea. The Specific Plan was adopted to implement the goals and policies of the Westlake Community Plan and the Silver Lake–Echo Park–Elysian Valley Community Plan.[48] The Specific Plan was also intended to regulate all development, including use, location, height, and density; ensure compatibility of uses; and provide for the consideration of additional public transit. Additionally, the Specific Plan identifies the need to ensure that new commercial, industrial, and mixed-use projects contribute to the affordable housing stock through payment of a Housing Linkage Fee and/or the construction of affordable housing within the Specific Plan area. The type of residential units proposed and the design of the Project are consistent with the character of this neighborhood and the applicable standards in the Specific Plan. The Zoning Classification as designated by the Specific Plan for the Project Site is C4(CW)-U/6. The C4 Zone permits commercial uses and residential uses allowed within the R4 Zone with a minimum lot area of 400 square feet per dwelling unit. The Project would be composed of multifamily residential uses and neighborhood-serving retail uses, which are permitted by the Central City West Specific Plan within the Westlake Community Plan. As such, the residential and commercial and retail uses proposed by the Project would be consistent with the allowable uses pursuant to the CCWSP. The "U" designation limits buildings and structures to maximum heights of 1,218 feet above mean sea level (amsl).[49] The maximum height of the project reaches approximately 560 feet amsl. The project includes a 35 percent Density Bonus request with two on-menu incentives that include a 35 percent increase in floor area ratio and density calculation based on the inclusion of land area required to be dedicated for street or alley purposes. The "6" signifies a maximum FAR of 6.0:1.[50] With the Density Bonus on-menu incentive for FAR, the project is permitted and proposes a maximum FAR of 8.0:1. The lot size of the project pre-dedication is 30,125 SF + 2,182 SF (alley area) = 32,307 square feet, thereby yielding a base number of 178 dwelling units. With a 35 percent Density Bonus, the project is permitted and proposes to have a total of 241 dwelling units. As

48 City of Los Angeles Department of City Planning, Central City West Specific Plan (2009).
49 City of Los Angeles Department of City Planning, Central City West Specific Plan, Section 8.A.3 (2009).
50 City of Los Angeles Department of City Planning, Central City West Specific Plan, Section 6.C (2009).

such, the project is in compliance with the permitted density and FAR permitted by the Specific Plan in conjunction with the Density Bonus request.

Los Angeles Municipal Code

The Project Site is zoned C4(CW)-U/6.[51] The C4 Limited Commercial Zone permits commercial uses and residential uses allowed within the R4 Zone. In addition, LAMC Section 12.22.A.18.(a), allows for a site lot zone commercial that is also designated on an adopted Community Plan as "Regional Center" or "Regional Commercial" to be developed with residential uses to the density of the R5 zone. As such the Project does not conflict with the land use provisions of the LAMC.

Open Space

As stated in **Section 3.0, Project Description**, the Project would comply with the open space requirements of the CCWSP and LAMC. Based on the number of units and the tentative mix of unit types, 24,100 square feet of common open space would be required by the Specific Plan; and 26,525 square feet of open space, common and/or private would be required by the LAMC. A total of 33,397 square feet of open space would be provided on-site, of which 24,447 square feet would be comprised of the required common open space.

In addition to the minimum common open space requirements, the Specific Plan also requires that a minimum of 241 trees be planted on-site pursuant to Appendix D—Urban Design Guidelines, in Section C.2 of the Central City West Community Plan. However, the Project would plant 121 trees on the Project Site along the northern and eastern property boundaries and on the podium level along W 7th Street. The Project proposes to locate up to 50 percent of the required 241 trees off site as permitted by Section C.2 of the Urban Design Guidelines of the Specific Plan as an alternative compliance.

Parking

As stated in **Section 3.0, Project Description,** the Project would be compliant with the parking requirements of the LAMC. Based on the number of units and the tentative mix of unit types, 263 vehicular parking spaces are required. The six-level parking garage, which includes one level of subterranean parking, would provide a total of 341 parking spaces, consisting of 276 residential spaces, 15 commercial spaces, 42 guest spaces, and 8 ADA spaces. Access to both the

51 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org.

subterranean level and the estimated 24 parking spaces on the ground-floor level would be provided from the 7th Street driveway. The remaining parking spaces that would be located on the five levels of aboveground parking structure would be provided access from the alley entrance along Lucas Avenue. Based on the number of units and the tentative mix of unit types, 273 bicycle parking spaces are required and provided. Therefore, vehicle and bicycle parking would satisfy the requirements of the LAMC.[52]

Based on the above, the Project would not conflict with conflict with applicable land use plans, policy, or regulations. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if the Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed previously, no such plans presently exist that govern any portion of the Project Site. Further, the Project Site is located in an area that is already fully developed with commercial uses and is within a heavily urbanized area of Los Angeles. Therefore, the Project would not have the potential to cause such effects. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.11 MINERAL RESOURCES

Impact Analysis

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally important mineral resource; or if the Project's development would convert an existing or future regionally important mineral extraction use to another use; or if the Project's development would affect access to a site used or potentially available for

52 City of Los Angeles Department of City Planning, *Parking Requirements,* LAMC, sec. 12.21 A.4

regionally important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone 2 (MRZ-2) Area, or other known or potential mineral resource area; and (b) whether the mineral resource is of regional or Statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is not located within an MRZ-2 Area, Oil Drilling/Surface Mining Supplemental Use District, or Oil Field/Drilling Area.[53] Therefore, no impacts associated with the loss of availability of a known mineral resource would occur. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally important mineral resource; if the development would convert an existing or future regionally important mineral extraction use to another use; or if the development would affect access to a site used or potentially available for regionally important mineral resource extraction. The Project Site is not located within an MRZ-2 Area,[54] nor is the Project Site is designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.12 NOISE

Impact Analysis

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established

53 City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps (September 1996).
54 City of Los Angeles Department of City Planning (September 1996).

in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact with Project Mitigation. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail as follows.

Construction

Construction-related noise impacts would be significant if, as indicated in Section 112.05 of the LAMC, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dB[A]) at a distance of 50 feet from the noise source. This noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the previous noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. As defined in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at any off-site, noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by five (5) dB(A) or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Project would require the use of heavy equipment for site clearing, grading, excavation, foundation preparation, 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.

The EPA has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in **Table 4.12-1, Noise Range of Typical Construction Equipment**, and **Table 4.12-2, Typical Outdoor Construction Noise Levels**, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table 4.12-1
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dB(A) Leq at 50 Feet[a]
Front loader	73–86
Trucks	82–95
Cranes (moveable)	75–88
Cranes (derrick)	86–89
Vibrator	68–82
Saws	72–82
Pneumatic impact equipment	83–88
Jackhammers	81–98
Pumps	68–72
Generators	71–83
Compressors	75–87
Concrete mixers	75–88
Concrete pumps	81–85
Backhoe	73–95
Tractor	77–98
Scraper/Grader	80–93
Paver	85–88

Source: EPA. Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717 (1971).

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*

The noise levels shown in **Table 4.12-1** represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in **Table 4.12-2**, construction noise during the heavier initial periods of construction is presented as 86 dB(A) level equivalent (Leq) when measured at a reference distance of 50 feet from the center of construction activity.[55] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately six (6) dB(A) per doubling of distance. For example, a noise level of 84 dB(A) Leq measured at 50 feet from the noise source to the receptor would

55 Although the peak noise levels generated by certain construction equipment may be greater than 86 dB(A) at a distance of 50 feet, the equivalent noise level would be approximately 86 dB(A) Leq (i.e., the equipment does not operate at the peak noise level over the entire duration).

reduce to 78 dB(A) Leq at 100 feet from the source to the receptor, and reduce by another six (6) dB(A) Leq to 72 dB(A) Leq at 200 feet from the source to the receptor.

Table 4.12-2
Typical Outdoor Construction Noise Levels

Construction Phase	Approximate Leq dB(A) 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: U.S. Department of Transportation, Construction Noise Handbook, Chapter 9.0 (August 2006).

Project construction activities would be expected to occur and generate noise. These activities include site preparation, excavation, and grading; and the physical construction and finishing of the proposed structures. Land uses on the properties surrounding the Project Site primarily include surface parking lots, office/commercial, warehouse/industrial, and multifamily residential uses. Among these land uses, multifamily residential uses have been identified and depicted in **Figure 4.12-1, Noise Monitoring and Sensitive Receptor Map**, as the most likely sensitive receptors to experience noise-level increases during Project construction. To identify the existing ambient noise levels at these nearby off-site sensitive receptors as well as the general vicinity of the Project Site, noise measurements were taken with a Larson Davis Model 831 sound level meter, which conforms to industry standards set forth in the American National Standard Institute (ANSI) S1.4-1983 (R2001)—Specification for Sound Level Meters. Additionally, this noise meter meets the requirement specified in Section 111.01(l) of the LAMC that the instruments be "Type S2A" standard instruments or better (See **Appendix B, Noise Background and Modeling Data**). This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The measured noise levels are shown in **Table 4.12-3, Existing Ambient Daytime Noise Levels in Project Site Vicinity**.

Table 4.12-3
Existing Ambient Daytime Noise Levels in Project Site Vicinity

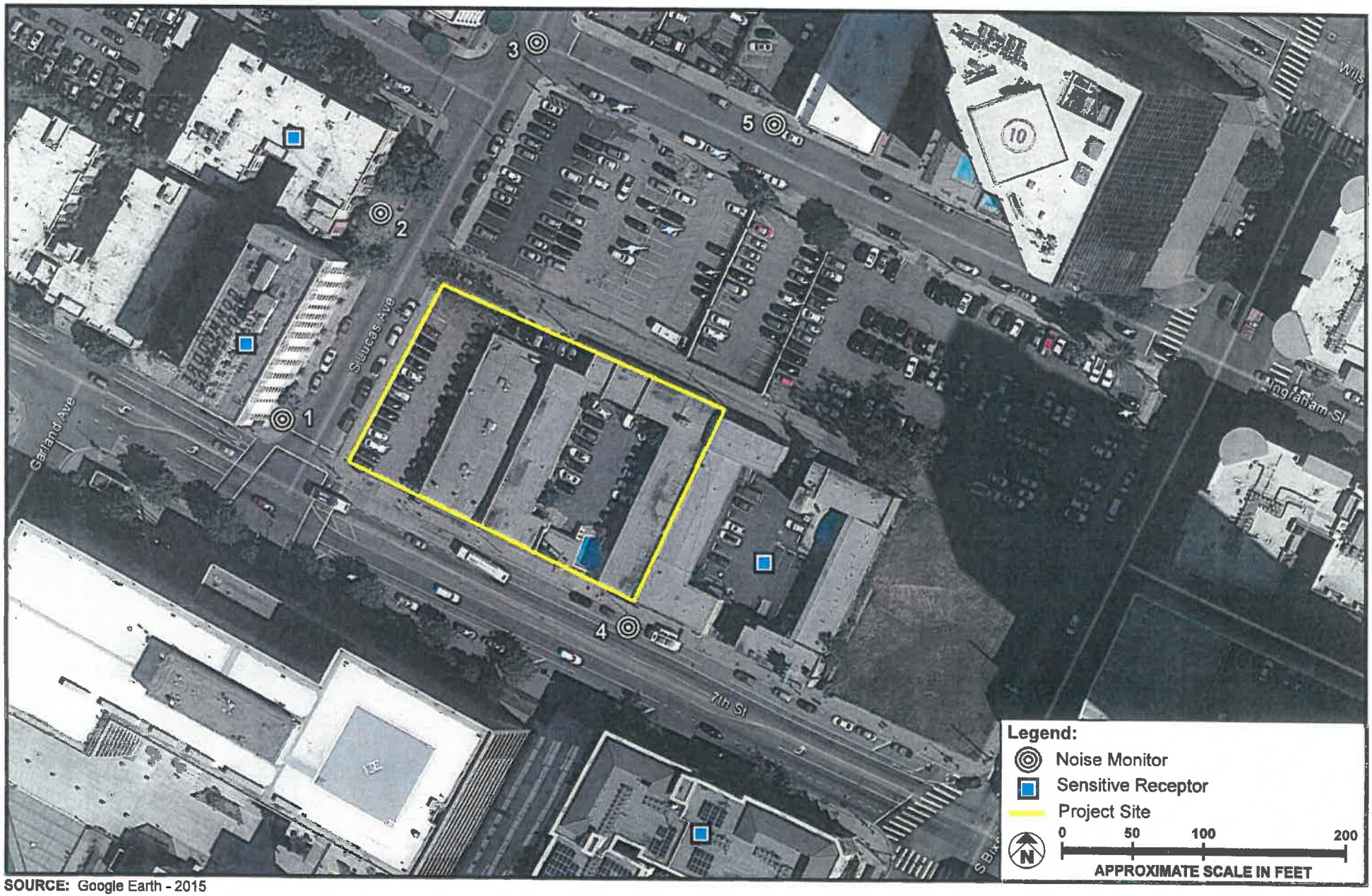
Site	Location	Primary Noise Source	Leq (15-minute)

Site 1	Corner of 7th Street and Lucas Avenue	Heavy traffic along 7th Street	73.7
Site 2	Lucas Avenue, north of 7th Street, south of Ingraham Street	Surface parking lot noise and pedestrian activity along Lucas Avenue	64.8
Site 3	Corner of Lucas Avenue and Ingraham Street	Traffic noise along Otsego Street and Klump Avenue, pedestrian activity	68.3
Site 4	7th Street, west of Bixel Street, east of Lucas Avenue	Traffic noise along Klump Avenue, parking lot activity	75.0
Site 5	Ingraham Street, west of Bixel Street, east of Lucas Avenue	Surface parking lot noise and pedestrian activity along Lucas Avenue	62.2

*Notes: Refer to **Appendix B** for raw data.*
Measurements were taken on Thursday, September 10, 2015 from 10:52 AM through 1:05 PM.

Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those listed in **Table 4.12-3**. It should be noted that any increase in noise levels at off-site receptors during construction of the Project would be temporary in nature and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., excavation and grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed buildings) because the proposed physical structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

As previously discussed, typical construction noise levels associated with the Project could exceed 75 dB(A) at 50 feet from the Project Site. However, as defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at any off-site noise-sensitive location.



SOURCE: Google Earth - 2015

FIGURE **4.12-1**

Meridian Consultants

Noise Monitoring and Sensitive Receptor Map

107-001-15

The *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by five (5) dB(A) or more at a noise sensitive use, would also normally result in a significant impact. Since construction activities associated with each of the proposed developments at the Project Site would last for more than 10 days in a three-month period, the Project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors would be increased by five (5) dB(A) or more. Sensitive receptors nearest to the Project Site include the multifamily residential units directly west and south of the Project Site, and the commercial building to the east occupied by a hotel. Based on the results shown in **Table 4.12-4, Estimated Exterior Construction Noise at Nearest Sensitive Receptors**, the ambient exterior noise levels at the nearest identified off-site sensitive receptors would be exceeded by five (5) dB(A) or more. Based on the criteria established in the *L.A. CEQA Threshold Guide,* a substantial temporary or periodic increase in ambient noise levels would occur at the identified off-site sensitive receptors.

Table 4.12-4
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

Sensitive Land Uses	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dB[A]) Leq)	Estimated Peak Construction Noise Levels (dB[A] Leq)	Noise-Level Increase (dB[A] Leq)
Hotel (east of the Project site)	10	75.0	104.9	29.9
Multifamily residential units (directly west of the Project site)	60	73.7	89.4	15.7
Multifamily residential units (west of the Project site)	75	64.8	87.4	22.6
Multifamily residential units (south of the Project Site)	90	75.0	85.9	10.9

*Note: Refer to **Appendix B** for Construction Noise Model worksheet*

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday.

Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to the City Noise Ordinance (LAMC, Section 112.05), construction noise levels are exempt from the 75 dB(A) noise threshold if all technically feasible noise attenuation measures are implemented.

The estimated construction-related noise levels associated with the Project would exceed the numerical noise threshold of 75 dB(A) at 50 feet from the noise source as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the Project would exceed the existing ambient noise levels at the identified off-site sensitive receptors by more than the 5 dB(A) threshold established by the *L.A. CEQA Thresholds Guide* during all construction phases. Therefore, the mitigation measures identified below shall be implemented in order to reduce the noise levels associated with construction of the Proposed Project to the maximum extent technically feasible. In addition Regulatory Compliance Measure (RCM) **RC-NO-1**, would require the Project to comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically feasible. Impacts would less than significant with mitigation incorporated.

Operational

Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structure. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings in the Project vicinity. As such, the HVAC equipment associated with the Project would not represent a new source of noise in the Project vicinity. The operation of this and any other on-site stationary sources of noise would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five (5) dB.

The operation of on-site, Project-related mechanical equipment, such as air conditioning equipment and exhaust fans, may generate audible noise levels. Mechanical equipment would likely be located on building rooftops, which would be shielded from nearby uses. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **XII-20, XII-40, XII-60** and **XII-240** are proposed to reduce potentially significant impacts to a less than significant level.

XII-20 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.
- A temporary noise control barrier shall be installed on the property line of the construction site abutting residential uses. The noise control 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.

XII-40 Increased Noise Levels (Parking Structure Ramps)

Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-60 Increased Noise Levels (Mixed-Use Development)

Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

XII-240 Construction Noise Levels

- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

- Noise and ground-borne vibration resulting from construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or man-made barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities toward these land uses to the maximum extent possible.

- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction sites prior to the start of construction and displayed in a location that is readily visible to the public.

- Barriers such as but not limited to plywood structures or flexible sound control curtains extending 8 feet in height shall be erected around the perimeter of the construction site to minimize the amount of noise during construction on the nearby noise-sensitive uses. During peak construction activities, such barriers shall be capable of providing 20db noise reduction along the east and west sides of the site.

b. *Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*

Less than Significant Impact with Project Mitigation. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. 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.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. 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 the operation of mechanical equipment, the movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne 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

Construction activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and 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. The construction activities associated with the Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC, Section 12.08.350) states a presumed perception threshold of 0.01 inches per second RMS, this threshold applies to groundborne 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 significance 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:[56]

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

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

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, including schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table 4.12-5, 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. As shown in **Table 4.12-5,** vibration velocities could range from 0.003 to 0.089 inch/second PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4.12-5
Vibration Source Levels for Construction Equipment

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report (2006).

As stated previously, the nearest historic resource or potentially historic resource is the City Center Hotel sign on the existing two-story hotel currently on the Project Site. Implementation of the Project would involve the removal and relocation of the historic resource. The next nearest historic resource is the Hotel Commodore building located approximately 60 feet west of the Project Site. As shown in **Table 4.12-5**, at distances greater than 25 feet from the Project Site boundary, construction-related vibration levels would not exceed 0.089 PPV. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage. Given that maximum off-site vibration levels would not exceed 0.089 PPV, there would be no potential for Project construction to result in vibration levels exceeding the most restrictive threshold of significance. Impacts with respect to building damage resulting from Project-generated vibration would be less than significant.

In terms of human annoyance resulting from vibration generated during construction, the multifamily residential uses located in the vicinity of the Project Site could be exposed to increased vibration levels. As such, under Regulatory Compliance Measure (RCM) **RC-NO-1**, the Project would comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically feasible. Impacts would be less than significant.

Operation

The Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks may be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. Impacts would be less than significant.

Mitigation Measures: Mitigation Measures **XII-20** and **XII-40** are proposed to reduce potentially significant impacts to a less than significant level.

XII-20 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.
- A temporary noise control barrier shall be installed on the property line of the construction site abutting residential uses. The noise control 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.

XII-40 Increased Noise Levels (Parking Structure Ramps)

Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

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

Less than Significant Impact with Project Mitigation. A significant impact may occur if the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for operational noise impacts, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in **Table 4.12-6, Community Noise Exposure Levels (CNEL)**, to increase by three dB(A) in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any five (5) dB(A) or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by three dB(A) CNEL at homes where the resulting noise level would be at least 70 dB(A) CNEL. In addition, any long-term increase of five (5) dB(A) CNEL or more is considered to cause a significant impact. To achieve a three (3) dB(A) CNEL increase in ambient noise from

traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, this section also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a Leq standard of five (5) dB(A) over ambient conditions as constituting a LAMC violation.

Table 4.12-6
Community Noise Exposure Levels (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, duplex, mobile homes	50–60	55–70	70–75	Above 75
Multifamily homes	50–65	60–70	70–75	Above 75
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	Above 80
Transient lodging (motels, hotels)	50–65	60–70	70–80	Above 75
Auditoriums, concert halls, and amphitheaters	—	50–70	—	Above 70
Sports arena, outdoor spectator sports	—	50–75	—	Above 75
Playgrounds, neighborhood parks	50–70	—	67–75	Above 75
Golf courses, riding stables, water recreation, cemeteries	50–75	—	70–80	Above 80
Office buildings, business and professional/commercial	50–70	67–77	Above 75	—
Industrial, manufacturing, utilities, agriculture	50–75	70–80	Above 75	—

[a] Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal, conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.
Sources: Office of Planning and Research, State of California Genera Plan Guidelines (October 2003) (in coordination with the California Department of Health Services). City of Los Angeles, General Plan Noise Element (adopted February 1999).

Traffic Noise

For a new noise source to be audible, there would need to be a three (3) dB(A) or greater CNEL noise increase. As discussed previously, the traffic volume on any given roadway would need to double for a three (3) dB(A) increase in ambient noise to occur. According to the *L.A. CEQA*

Thresholds Guide, if a project were to result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

According to the *Traffic Study* provided for the Project, the proposed development would result in a maximum net increase of 1,128 daily vehicle trips, including 73 AM peak-hour trips (4 inbound, 69 outbound) and 106 PM peak-hour trips (70 inbound, 36 outbound) as is further corroborated by the Department of Transportation (DOT) Interdepartmental Correspondence dated April 22, 2015. As shown in the *Traffic Study*, the Project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the Project Site and would not have the potential to increase roadway noise levels by three dB(A). Traffic-generated noise impacts would be considered less than significant.

Operational Noise—Stationary Noise Sources

The new residences constructed as part of the Project may include exterior mechanical equipment such as HVAC units and exhaust fans. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five (5) dB. New HVAC units can generate noise levels up to 76 dB at the source. Typical noise reduces approximately 8 dB three feet from the unit, 14 dB approximately six feet from the unit, on up to 32 dB approximately 45 feet from the unit.[57] Accordingly, noise levels from on-site HVAC units would generate 44 dBs approximately 45 feet from the unit, consistent with measured ambient noise levels. In addition, the on-site equipment would be shielded and, appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby uses as required by the mitigation measure listed below. Nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 PM and 7:00 AM. The use of residential HVAC equipment would not create a substantial impact to the ambient noise levels at the residential community such that the resulting noise would exceed the acceptable noise standards identified in **Table 4.12-6**, for multifamily residential uses. As such, potential impacts related to stationary noise sources would be less than significant.

57 ANSI/AHRI Standard 275-2010, Application of Outdoor Unitary Equipment A-Weighted Sound Power Ratings, Table 4, Distance Factor.

Parking Garage Noise

Noise would be generated by activities within the 341 parking spaces associated with the Project. Sources of noise within the parking structure would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. Given that the six-level parking structure would be entirely enclosed and the one-level subterranean parking would be entirely underground, noise generated at these levels would likely be imperceptible at ground level locations on and adjacent to the Project Site. Operational-related noise generated by motor-driven vehicles within the Project Site is regulated under the LAMC. With regard to motor-driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor-driven vehicles on any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Additionally, under Regulatory Compliance Measure (RCM) **RC-NO-1**, the Project would comply with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **XII-40** and **XII-60** are proposed to reduce potentially significant impacts to a less than significant level.

XII-40 Increased Noise Levels (Parking Structure Ramps)

Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-60 Increased Noise Levels (Mixed-Use Development)

Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

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

Less than Significant Impact with Project Mitigation. A significant impact may occur if the Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at any off-site noise-sensitive location. The *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a three-month period that would increase ambient exterior noise levels by five (5) dB(A) or more at a noise sensitive use, would also normally result in a significant impact.

As discussed previously, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration with mitigation incorporated.

Mitigation Measures: Mitigation Measures **XII-40** and **XII-60** are proposed to reduce potentially significant impacts to a less than significant level.

XII-40 Increased Noise Levels (Parking Structure Ramps)

Environmental impacts may result from project implementation due to noise from cars using the parking ramp. However, the potential impacts will be mitigated to a less than significant level by the following measures:

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- Parking lots located adjacent to residential buildings shall have a solid decorative wall adjacent to the residential.

XII-60 Increased Noise Levels (Mixed-Use Development)

Environmental impacts to proposed on-site residential uses from noises generated by proposed on-site commercial uses may result from project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:

- Wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places, shall have a Sound Transmission Coefficient (STC) value of at least 50, as determined in accordance with ASTM E90 and ASTM E413.

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 the 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 in the vicinity of a project site. There are no airports located within a two-mile radius of the Project Site, nor is the Project Site within any airport land use plan or airport hazard zone. The Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. No impact would occur.

Mitigation Measures: No mitigation measures are required.

4.13 POPULATION AND HOUSING

Impact Analysis

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

Less than Significant Impact. A significant impact may 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall consider: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build-out, and would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

SCAG Regional Comprehensive Plan

In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan, *Helping Communities Achieve a Sustainable Future,* for the SCAG Region.[58] The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region.

The following principles are based on the region's adopted *Compass Growth Vision* Principles for Sustaining a Livable Region:

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

58 Southern California Association of Governments (SCAG), *2008 Regional Comprehensive Plan.* (2008).

- *Foster livability in all communities.* Foster safe, healthy, and walkable communities with diverse services, strong civic participation, affordable housing, and equal distribution of environmental benefits.

- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG Regional Transportation Plan Sustainable Communities Strategy

In April 2012, SCAG adopted the *Regional Transportation Plan 2012–2035 Sustainable Communities Strategy* (RTP/SCS).[59] As a designated MPO under federal law, SCAG is responsible for developing and adopting a long-range RTP every 4 years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region's sustainable future. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments that are required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and the multilevel investment of stakeholders throughout the region.

SCAG's Compass Growth Vision Strategy

SCAG's *Compass Growth Vision*, adopted in 2004 and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment.[60] The *Compass Growth Vision* is driven by four key principles: (1) Mobility—Getting where we want to go, (2) Livability—Creating positive communities, (3) Prosperity—Long-term health for the region, and (4) Sustainability—Preserving natural surroundings. Additionally, the *Compass Growth Vision* incorporates a 2 percent growth strategy that will increase the region's mobility by:

59 SCAG, *Regional Transportation Plan 2012–2035 Sustainable Communities Strategy*, adopted April 2012.
60 Southern California Associations of Governments, *Compass Growth Vision.* (2004).

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars;
- Designing safe, attractive transit centers and plazas that people enjoy using; and
- Creating mini communities around transit stations, with small businesses, urban housing, and restaurants all within an easy walk.

The Project is consistent with the goals and strategies of the 2008 RCP and the *Compass Growth Vision Strategy* discussed previously. With respect to regional growth, SCAG forecasts that the population in the City of Los Angeles Subregion will increase to 4.34 million persons by 2030. As shown in **Table 4.13-1, SCAG's 2008 Regional Transportation Plan Growth Forecast for the City of Los Angeles Subregion**, the forecast from 2010 through 2030 projects growth of 290,797 additional persons, which yields a 7.17 percent growth rate.

Table 4.13-1
SCAG's 2008 Regional Transportation Plan Growth Forecast for the City of Los Angeles Subregion

Projection Year	Population	Household	Person/Household
2010	4,057,484	1,386,658	2.92
2030	4,348,281	1,578,850	2.75
Net Change from 2010 to 2030	**290,797**	**192,192**	
Percent Change	7.17%	13.86%	

Source: SCAG, 2008 Regional Transportation Plan (RTP) Update. (adopted May 8, 2008).

Based on the community's current household demographics (e.g., an average of 3.12 persons per household for the Westlake area), the construction of 241 additional residential units on the Project Site would result in an increase in approximately 752 residents in the City of Los Angeles.[61] The overall increase in housing units and population would be consistent with the SCAG forecast of 192,192 additional households and approximately 290,797 persons in the City of Los Angeles between 2010 and 2030. As such, the Project would not cause unexpected growth (i.e., new housing or employment generators). The Project would not accelerate development in an undeveloped area that exceeds projected/planned levels for the year of the Project occupancy and build-out that would result in an adverse physical change in the environment or would

61 Los Angeles Department of City Planning Demographic Research Unit, *Statistical Information, Local Population and Housing Estimates*, http://cityplanning.lacity.org/DRU/HomeLocl.cfm.

introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. The Project would be consistent with the goals and strategies of SCAG's Regional Comprehensive Plan and the *Compass Growth Vision Strategy.*

The Project would provide residential units and neighborhood-serving commercial uses on a site that is currently underutilized. No displacement of existing housing would occur with the Project. As stated before, the proposed mixed-use residential and commercial uses are consistent with the allowable uses as permitted by the Central City West Specific Plan, LAMC where the Specific Plan does not have provisions, and General Plan land use designations. The Project is the type of project encouraged by SCAG and City policies to accommodate growth in urban centers located close to existing employment centers and mass transit. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

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

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the project, in terms of net loss of market rate and affordable units;
- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area;
- The land use and demographic characteristics of the project area and the appropriateness of housing in the area; and
- Whether the project is consistent with adopted City and regional housing policies, such as the Framework and Housing Elements, Housing and Urban Development (HUD) Consolidated Plan and Comprehensive Housing Affordability Study (CHAS) policies, redevelopment plan, Rent Stabilization Ordinance, and the RCP.

The Project would consist of the development of new residential and commercial land uses on a site that is currently occupied by an existing two-story hotel, warehouse, and related surface parking. No displacement of existing housing would occur with the Project. The proposed uses are consistent and allowable with respect to the zoning and General Plan land use designations. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may occur if a project would displace substantial numbers of people, necessitating construction of replacement housing elsewhere. The Project would consist of the development of new residential and commercial land uses on a site that is currently occupied by an existing two-story hotel, warehouse, and related surface parking. No displacement of existing housing would occur. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.14 PUBLIC SERVICES

Impact Analysis

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

i. Fire protection

Less than Significant Impact with Project Mitigation. Based on the *L.A. CEQA Thresholds Guide*, the 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 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 would include a total of 241 dwelling units, which would generate approximately 752 new residents and approximately 7,291 square feet of commercial floor area. Therefore, the Project could potentially increase the demand for LAFD services. The Project Site is served by LAFD Station 11, located at 1819 W 7th Street, approximately 0.6 miles west of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station 11 to the Project Site, fire protection response would be considered adequate.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gallons per minute are flowing. The overall fire flow requirement for the proposed mixed-use commercial/residential development is 4,000 gpm from four fire hydrants flowing simultaneously. Under Regulatory Compliance Measure (RCM) **RS-WS-1**, the adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be determined by LAFD during the plan check review process. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **XIV-10** is proposed to reduce potentially significant impacts to a less than significant level.

XIV-10 Public Services (Fire)

Environmental impacts may result from project implementation due to the location of the project in an area having marginal fire protection facilities. However, this potential impact will be mitigated to a less than significant level by the following measure:

- The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the

approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii. Police protection

Less than Significant Impact with Project Mitigation. For the purpose of this Initial Study, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve the Project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for police services anticipated at the time of project build-out 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 in the Rampart Division of the LAPD's Central Bureau. The Rampart Division provides police protection services for an approximately 5.54-square-mile area and includes the communities of Angelino Heights, Echo Park, Historic Filipinotown, Koreatown, Lafayette Park, Macarthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake. The Rampart Division is served by the Rampart Community Police Station, located at 1401 West 6th Street. Within the Rampart area, the Project is located within Reporting District (RD) 249. RD 249 is defined by the following boundaries: 3rd Street to the north, SR 110 on the east, 7th Street on the south, and Lucas Avenue to the west.

Implementation of the Project would result in an increase of site visitors, residents, and employees within the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would implement principles of the City of Los Angeles Crime Prevention through *Crime Prevention Environmental Design (CPTED) Guidelines*, as required by one of the mitigation measures identified below.

Specifically, the Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. In addition, the continuous visible and nonvisible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, Project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In light of these features, it is anticipated that any increase in demands on police services would be relatively low and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **XIV-20** and **XIV-30** are proposed to reduce potentially significant impacts to a less than significant level.

XIV-20 Public Services (Police – Demolition/Construction Sites)

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

XIV-30 Public Services (Police)

Environmental impacts may result from project implementation due to the location of the project in an area having marginal police services. However, this potential impact will be mitigated to a less than significant level by the following measure:

- The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000.

These measures shall be approved by the Police Department prior to the issuance of building permits.

iii. Schools

Less than Significant Impact. A significant impact may occur if the Project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the Project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for school services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the Project's proportional contribution to the demand; (c) whether, and to the degree to which, accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s); and (d) whether the Project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by the following LAUSD public schools: Esperanza Elementary, located at 680 Little Street, which serves kindergarten through 5th grade students; John H Liechty Middle School, located at 650 S Union Avenue, which serves 6th through 8th grade students; and Belmont Senior High School, located at 1575 W 2nd Street, which serves 9th through 12th grade students.

As shown in **Table 4.14-1, Proposed Project Estimated Student Generation,** the Project would generate approximately 51 elementary students, 25 middle school students, and 25 high school students, for a total of approximately 101 students. It is likely that some of the students generated by the Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD.

Table 4.14-1
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Multifamily residences[a]	241 du	50	24	24	98
Commercial[b]	7,291 ft.	1	1	1	3
	Total	**51**	**25**	**25**	**101**

Source: Los Angeles Unified School District, School Fee Justification Study (September 2002).
Note: du = dwelling unit; sq. ft. = square feet.

[a] *Student generation rates are as follows for residential uses: 0.2042 elementary, 0.0988 middle, and 0.0995 high school students per unit.*

[b] *Student generation rates are as follows for commercial uses: 0.0149 elementary, 0.0069 middle, and 0.0067 high school students per 1,000 square feet.*

Under Regulatory Compliance Measure (RCM), **RC-PS-1**, the Project Applicant will be required to pay mandatory developer fees pursuant to California Education Code, Section 17620(a)(1) to offset the Project's demands on local schools. Impacts would less than significant.

Mitigation Measures: **No mitigation measures are required.**

iv. Parks

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks). A significant impact would 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 Public Recreation Plan, a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City

and includes Local Recreation Standards.[62] The standard ratio of neighborhood and community parks to population is one acre per 1,000 residents within a one- to two-mile radius (for neighborhood and community parks, respectively). The Project Site is located within a highly urbanized area of the Westlake community and, as shown in **Table 4.14-2, Recreation and Park Facilities within the Project Area,** has access to 14 parkland and public recreation facilities within a two-mile radius. It is estimated that the development of the Project would result in an increase of 752 new residents to the Westlake Community Plan area.

Table 4.14-2
Recreation and Park Facilities within the Project Area

Park Name	Park Amenities	Distance to Project Site (miles)
1. La High Memorial Park	Children's play area	0.63
2. Hope and Peace Park	Basketball hoops, benches	0.67
3. Ramona Gardens Park	Children's play area, basketball courts, handball courts, tennis courts, and volleyball courts	0.78
4. Macarthur Park	Auditorium, children's play area, and picnic tables	0.88
5. Alvarado Terrace Park	Children's play area and gazebo	1.06
6. Lake Street Park	Gymnasium and adjacent staging area	1.23
7. Lafayette Park	Auditorium, basketball courts, children's play area, community room, picnic tables, soccer field, and tennis courts	1.25
8. City Hall Park Center	Benches, community room	1.3
9. Pico Union Park	Children's play area and picnic tables	1.3
10. Echo Park	Barbecue pits, baseball diamond, basketball courts, children's play area, community room, indoor gym, picnic tables, seasonal pool, soccer field, tennis courts, and year round pool	1.31
11. Los Angeles Plaza Park	El pueblo de Los Angeles, museums, Olvera Street, restaurants, and shops	1.49
12. 6th & Gladys Street Park	Basketball courts, children's play area, benches	1.53
13. Everett Park	Open lawn space, trash receptacles	1.59

62 City of Los Angeles General Plan, Service Systems Element.

Park Name	Park Amenities	Distance to Project Site (miles)
14. Saint James Park	Children's play area	1.72

Source: City of Los Angeles Department of Recreation of Parks, Location Map, http://raponline.lacity.org/maplocator.

Based on the standard parkland ratio goal of one acres per 1,000 residents, the Project would generate a need for approximately 0.752 acres of public parkland. This demand would be met through a combination of: (1) on-site open space proposed within the Project; (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1); and (3) the availability of existing park and recreation facilities within the area.

Based on the number of units and tentative mix of unit types, approximately 24,100 square feet of open space would be required for Project Site. A total of 24,447 square feet of open space would be provided on site. Any additional demand would be met through the payment of applicable taxes or fees in accordance with LAMC Section 17.58, as required under Regulatory Compliance Measure (RCM) **RC-PS-2**. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

v. Other public services

Less than Significant Impact. A significant impact may occur if the Project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether the 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 LAPL branches currently serving the Project Site include the Pico Union Branch Library, located at 1030 S Alvarado Street, approximately 1.2 miles southwest of the Project Site; and the Central Library, located at 630 W 5th Street, approximately 1.1 miles northeast of the Project Site. The Pico Union Branch Library and the Central Library currently meet the library demands of the surrounding community, and would be able to meet the Project's demand for library services. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.15 RECREATION

Impact Analysis

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 may occur if the 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

It is reasonable to assume that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. As noted in **Table 4.14-2, Recreation and Park Facilities within the Project Area**, 14 existing parks and recreation centers are located within 2 mile of the Project Area and are available to serve the future residents to the Project Site. The Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility. As stated previously, the Project is providing a total of 24,447 square feet of open space on site. Any

additional demand would be met through the payment of applicable taxes or fees in accordance with LAMC Section 17.58, as required under Regulatory Compliance Measure (RCM) **RC-PS-2**. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. A significant impact may occur if the Project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As stated previously, 14 existing parks are located within 2 miles of the Project and are available to serve the future residents to the Project Site. Although the Project would place some additional demands on park facilities, the increase in demand would be met through a combination of on-site amenities and existing parks near the Project area. The Project's increased demands on recreational facilities would not by itself result in the construction of a new park, which might have an adverse physical effect on the environment. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.16 TRANSPORTATION AND TRAFFIC

Impact Analysis

a. Would the project 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?

The following section summarizes and incorporates by reference information from the *7th and Lucas Mixed-Use Project Traffic Impact Analysis,* dated April 13, 2015 (*Traffic Study*) and

prepared by Jano Baghdanian & Associates.[63] The *Traffic Study* is included as **Appendix C** of this Initial Study.

Less than Significant Impact with Project Mitigation. 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 ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Operational Traffic

A total of five study intersections were identified, in conjunction 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. 7th Street and Lucas Avenue
2. 7th Street and Bixel Street
3. Wilshire Boulevard and Lucas Avenue
4. Wilshire Boulevard and Bixel Street
5. 8th Street and Garland Avenue (SR 110 SB Off-Ramp)

Estimated Trip Generation

The Project includes 241 dwelling units with approximately 7,291 square feet of ground level commercial space. Trip generation estimates for the Project were provided by LADOT and were calculated using a combination of previous study findings and the trip generation rates contained in *Trip Generation, 9th Edition*. **Table 4.16-1, Trip Generation Estimates,** summarizes the trip generation estimates for the daily AM peak-hour and PM peak-hour periods, respectively.

63 Jano Baghdanian & Associates, *7th & Lucas Mixed-Use Project Traffic Impacts Analysis* (April 13, 2015).

Table 4.16-1
Trip Generation Estimates

Land Use (ITE Code)	Size	Units	Daily	AM Peak-Hour Trips In	AM Peak-Hour Trips Out	AM Peak-Hour Trips Total	PM Peak-Hour Trips In	PM Peak-Hour Trips Out	PM Peak-Hour Trips Total
Proposed									
Residential condominiums (ITE 230)	240	du	1394	18	88	106	84	41	125
Transit Reduction			*(209)*	*(3)*	*(13)*	*(16)*	*(13)*	*(6)*	*(19)*
General retail (ITE 820)	8.16	tsf	348	5	3	8	14	16	30
Less Walk-in/Internal Capture			*(35)*	*(1)*	*(0)*	*(1)*	*(1)*	*(2)*	*(3)*
Total			***1,498***	***19***	***78***	***97***	***84***	***49***	***133***
Existing									
Hotel (ITE 310)	42	rooms	343	13	9	22	13	12	25
Warehousing (ITE 150)	7.68	tsf	27	2	0	2	1	1	2
Total			***370***	***15***	***9***	***24***	***14***	***13***	***27***
Net Trip Generation			**1,128**	**4**	**69**	**73**	**70**	**36**	**106**

Source: Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition. (2012).
Note: Refer to Traffic Study in ***Appendix C.***
du: dwelling units; sq. ft.: square feet.; tsf: thousand square feet

As shown in **Table 4.16-2**, the Project would generate 1,498 weekday trips, including 97 morning peak-hour trips and 133 afternoon peak-hour trips; and a net traffic increase of 1,128 weekday trips, including 73 morning peak-hour trips and 106 afternoon peak-hour trips.

Project Impacts

Existing with Project Impacts

This section addresses an analysis of potential impacts for the Existing Conditions plus Project Scenario. Project traffic was added to existing conditions traffic and the potential for impacts evaluated.

The total existing with Project conditions peak-hour traffic volumes are illustrated in Figure 19 in the *Traffic Study* for the AM and PM peak hours.

Table 4.16-2, 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. The analysis summarized in **Table-4.16-2** indicates that for the AM/PM peak hour, the addition of Project traffic would not cause the level of service (LOS) to change at any of the study intersections; moreover, any increases in volume/capacity (V/C) ratios would be less than the threshold for a significant impact to occur. Therefore, it is concluded that the Project would not cause any significant traffic impacts in either the AM or PM peak hours.

Table 4.16-2
Existing with Project Conditions—Intersection Level of Service AM/PM Peak Hours

No.	Intersection	Peak Hour	Existing		Existing with Project		Change in CMA	Significant Impact?
			V/C	LOS	V/C	LOS		
1	7th Street	AM	0.411	A	0.434	A	0.023	No
	Lucas Avenue	PM	0.633	B	0.655	B	0.022	No
2	7th Street &	AM	0.634	B	0.641	B	0.007	No
	Bixel Street	PM	0.522	A	0.531	A	0.009	No
3	Wilshire Boulevard &	AM	0.482	A	0.490	A	0.008	No
	Lucas Avenue	PM	0.516	A	0.537	A	0.021	No
4	Wilshire Boulevard &	AM	0.489	A	0.493	A	0.004	No
	Bixel Street	PM	0.517	A	0.521	A	0.004	No
5	8th Street &	AM	0.478	A	0.482	A	0.004	No
	Garland Avenue	PM	0.449	A	0.454	A	0.005	No

Source: Jano Baghdanian & Associates (April 2015)
Note: Refer to Traffic Study in ***Appendix C.***
LOS = level of service.

Future with Project Impacts

Table 4.16-3, 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. As shown in **Table 4.16-3**, all of the five study intersections are projected to operate at LOS C or better during both weekday morning and afternoon peak hours.

Table 4.16-3
Future without and with Project Conditions—Intersection Level of Service AM/PM Peak Hours

No.	Intersection	Peak Hour	Future without Project		Future with Project		Change in V/C	Significant Impact?
			V/C	LOS	V/C	LOS		
1	7th Street &	AM	0.455	A	0.477	A	0.004	No
	Lucas Avenue	PM	0.695	B	0.717	C	0.002	No
2	7th Street &	AM	0.705	C	0.711	C	0.001	No
	Bixel Street	PM	0.602	B	0.611	B	0.003	No
3	Wilshire Boulevard &	AM	0.594	A	0.602	B	0.019	No
	Lucas Avenue	PM	0.677	B	0.698	B	0.019	No
4	Wilshire Boulevard &	AM	0.615	B	0.619	B	0.005	No
	Bixel Street	PM	0.689	B	0.694	B	0.006	No
5	8th Street &	AM	0.509	A	0.514	A	0.000	No
	Garland Avenue	PM	0.473	A	0.478	A	0.004	No

Source: Overland Traffic Consultants, Inc. (August 2015).
Note: Refer to Traffic Study in ***Appendix C.***
NB = northbound; SB = southbound; LOS = level of service, CMA = Critical Movement Analysis

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 development of the Project. In addition, potential net increases in average daily vehicle trips and peak-hour vehicle trips from the 42 related projects were taken into consideration. Based on LADOT significant criteria, the change in traffic flow generated by the Project when compared to without Project conditions is not anticipated to result in a significant impact at any of the five study intersections under future with Project conditions.

Construction—Traffic

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 would require approximately 152 hauling truck trips at its peak. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The Project's construction trip traffic would be a fraction of the operational traffic, which would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that the haul trips would contribute to a significant increase in the overall congestion

in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. A construction work site traffic control plan would be submitted to LADOT for review and approval prior to the start of any construction work. The plan would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties. LADOT also recommends that all construction-related traffic be restricted to off-peak hours. Impacts would less than significant with project mitigation.

Mitigation Measures: Mitigation Measure **XVI-30** is proposed to reduce potentially significant impacts to a less than significant level.

XVI-30 Transportation (Haul Route)

- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
- (*Non-Hillside)*: Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. A significant impact would occur if Project traffic causes an increase in the D/C ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity, which causes or worsens LOS F conditions.

Congestion Management Plan Analysis

The Congestion Management Plan (CMP) requires that when a Traffic Impact Assessment (TIA) is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the amount of project traffic expected to use these facilities.

CMP Significant Traffic Impact Criteria

The *CMP Guidelines* state that a CMP freeway analysis must be conducted if 150 or more trips attributable to the proposed development are added to a mainline freeway-monitoring location in either direction during the morning or afternoon weekday peak hours. Similarly, a CMP arterial

monitoring station analysis must be conducted if 50 or more peak-hour project trips are added to a CMP arterial monitoring station during the morning or afternoon weekday peak hours of adjacent street traffic.

A significant project-related CMP impact would be identified if the CMP facility is projected to operate at LOS F (V/C > 1.00) and if the project traffic causes an incremental change in the V/C ratio of 0.02 or greater. The proposed development would not be considered to have a regionally significant impact, regardless of the increase in V/C ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of the project traffic.

There are no CMP intersection-monitoring locations in the Project study area. Therefore, no further review of potential impacts at any further intersections is necessary.

CMP Freeway-Monitoring Analysis

The CMP freeway-monitoring stations closest to the Project vicinity includes:

- SR 110 south of US 101, approximately 0.08 miles east of the Project site

The Project generates a total of 73 morning peak-hour trips and 106 afternoon peak-hour trips, which is less than the 150 trips per peak hour trips threshold to trigger a freeway analysis. Thus, the Project's CMP freeway-monitoring impacts are considered to be less than significant.

Regional Transit Impact Analysis

An analysis of potential Project impacts on the transit system was also performed, per the CMP requirements and guidelines. The CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 to estimate the number of person-trips to and from the Project.

The CMP guidelines estimate that approximately 3.5 percent of total Project person-trips may use public transit to travel to and from the site if the site is located within 0.25 miles of a CMP transit center. The nearest station from the Project Site is MTA's 7th Street/Metro Center Station, located approximately 0.40 miles east of the Project Site.

The Project is estimated to generate approximately 73 morning peak-hour trips and 106 afternoon peak-hour trips. Assuming an AVO of 1.4, the Project would generate 102 morning peak-hour person trips and 148 afternoon peak-hour person trips. Using the 3.5 percent mode split

suggested in the CMP, the Project would generate approximately 4 transit trips during the weekday morning peak hour and 5 transit trips during the weekday afternoon peak hour.

The Project location is well served by numerous established transit routes. With multiple public transportation opportunities within the Project vicinity, including bus routes and Metro lines, the existing transit service in the Project vicinity will adequately accommodate the new transit trips generated by the Project. Thus, based on the calculated number of generated transit trips, impacts to the existing or future regional transit system in the vicinity of the Project Site are not anticipated to be significant.

As such, no CMP freeway-monitoring segment or intersection analysis is required, which is further corroborated by the DOT Interdepartmental Correspondence dated April 12, 2015, and there would be no Project-related impacts to the CMP. The Project would not conflict with any travel demand measures. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it involved an aviation-related use or would influence changes to existing flight paths. No aviation-related use would occur.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact with Project Mitigation. A significant impact may occur if the Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in such a way as to create hazard conditions. The Project would not include unusual or hazardous design features. The Project will include two new vehicular access driveways to the Project Site, which include the 7th Street driveway and North Alleyway driveway. These driveways would be properly

designed and constructed to ensure the safety of pedestrian circulation in the Project area. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **XVI-40** is proposed to reduce potentially significant impacts to a less than significant level.

XVI-40 Safety Hazards

Environmental impacts may result from project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. However, the potential impacts can be mitigated to a less than significant level by the following measure:

- The developer shall install appropriate traffic signs around the site to ensure pedestrian, bicycles, and vehicle safety.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

e. Would the project result in inadequate emergency access?

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to emergency access if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new (or interfere with an existing) emergency response or evacuation plan, and the severity of the consequences.

The Project is located at the intersection of 7th Street and Lucas Avenue, neither of which is a selected disaster route as identified by the City's General Plan.[64] However, Good Samaritan Hospital, located at 1225 Wilshire Boulevard, is approximately 0.14 miles north of the Project Site. Development of the Project Site may require temporary and/or partial street closures due to construction activities. Such closures would be temporary and would have 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; especially with regard to minimizing inhibited access to the Good Samaritan Hospital. Additionally, prior to the issuance of a building

64 *City of Los Angeles Safety Element*, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

permit, the applicant shall develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan shall include, but not be limited to, the following: mapping of emergency exits; evacuation routes for vehicles and pedestrians; and documentation of and routes to nearest hospitals and fire departments. Additionally, the nearest designated emergency route to the project site is Figueroa Street, approximately 0.30 miles to the southeast; and Alvarado Street, approximately 0.75 miles to the northwest according to Exhibit H of the City of Los Angeles Safety Element.[65] Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures **XVI-50** and **XVI-80** are proposed to reduce potentially significant impacts to a less than significant level.

XVI-50 Inadequate Emergency Access

Environmental impacts may result from project implementation due to inadequate emergency access. However, these impacts can be mitigated to a less than significant level by the following measure:

- The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access.

XVI-80 Pedestrian Safety

- 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.

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

No Impact. For the purpose of this Initial Study, a significant impact may occur if the Project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on or off site. The Project Site is served by Metro Bus Lines 51, 53, and 352 and by the

65 City of Los Angeles General Plan, Safety Element (1990).

City's Downtown Area Short Hop (DASH) lines A and E. There is a posted stop for these lines on the 7th Street front of the Project Site. In addition, 7th Street features a designated bicycle lane along both sides of the street. The City's Mobility Plan indicates that 7th Street is designated to feature Tier 1 Protected Bicycle Lanes and also depicted as targeted for pedestrian safety enhancements.[66]

The Project would not require the disruption of public transportation services or the alteration of public transportation routes. The changes to the Project Site would not obstruct or interfere with the existing bus stop on 7th Street nor the existing bicycle lanes. The Project would include redevelopment of the sidewalk bordering the site to City standards. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.17 UTILITIES AND SERVICE SYSTEMS

Impact Analysis

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

No Impact. A significant impact would occur if the Project exceeds wastewater treatment requirements of the applicable RWQCB. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information that may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. Wastewater from the Project Site would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB.

66 Los Angeles Department of City Planning, Mobility Plan 2035. An Element of the General Plan, 2016.

The potential to exceed wastewater capacity would be further reduced with the following applicable Regulatory Compliance Measure (RCM) **RC-WQ-1**, which requires that all wastewater from the project be treated according to requirements of the National Pollutant Discharge Elimination System (NPDES) as authorized by the LARWQCB; and that a Storm Water Pollution Prevention Plan (SWPPP) implement construction Best Management Practices (BMP) to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in storm water runoff as a result of construction activities. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. A significant impact may occur if the 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. Based on the *L.A. CEQA Thresholds Guide*, 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 build-out; (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.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (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 8 storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by the LADWP. Water entering the 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 450 mgd during the nonsummer months and 550 mgd during the summer months; the LAAFP thus operates at

between 75 and 90 percent capacity, respectively. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

As shown in **Table 4.17-1, Estimated Project Water Demand**, the Project would generate a demand for approximately 16,008 gallons per day (gpd) of potable water. In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated water demand was based on 125 percent of the sewerage generation factors for residential and commercial categories. The estimate was then adjusted to reflect the 20 percent water conservation mandate pursuant to the LA Green Building Code. The LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and meet 50 percent construction waste recycling levels. Consequently, based on the estimates provided in **Table 4.17-1,** implementation of the Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Project would have a less than significant impact.

Table 4.17-1
Estimated Project Water Demand

Type of Use	Size of Use	Demand Factor[a]	Daily Demand (gpd)
Residential Units			19,280
Less 20% per LA Green Building Code	241 units	80 gal/unit/day	*3,856*
Net Water Demand			***15,424***
Commercial Uses			729
Less 20% per LA Green Building Code	7,291 sq. ft.	100/1,000 sq. ft.	*145*
Net Water Demand			***584***
Proposed Water Demand Total			**16,008**

Notes:
gpd = gallons per day; afy = acre-feet per year; sfd = single-family dwelling

[a] *Proposed indoor water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf; 125 percent sewage generation loading factor.*

The required minimum fire flow for the development is estimated to be approximately 4,000 gpm based on the Project's scale and density. The existing fire hydrants located along 7th Street are adequate for fire flow needs for the Project; no new public fire hydrant installations are anticipated for the Project.

In the event that any further water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based on the criteria established in the *L.A. CEQA Thresholds Guide*, 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.

The Los Angeles Bureau of Sanitation provides sewer service to the 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. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.[67] As shown in **Table 4.17-2, Estimated Project Wastewater Generation**, the Project would generate approximately 12,808 gpd of wastewater, representing a fraction of less than 1 percent of the available capacity.

67 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

Table 4.17-2
Estimated Project Wastewater Generation

Type of Use	Size of Use	Demand Factor[a]	Daily Demand (gpd)
Residential Units	241 units	64 gal/unit/day	15,424
Less 20% per LA Green Building Code			*3,084*
Net Water Demand			***12,340***
Commercial Uses	7,291 sq. ft.	80/1,000 sq. ft.	584
Less 20% per LA Green Building Code			*116*
Net Water Demand			***468***
Total Project Wastewater Generation			**12,808**

Notes:
gpd = gallons per day; afy = acre-feet per year; sfd = single-family dwelling

[a] *Proposed indoor water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.*

In accordance with the *L.A. CEQA Thresholds Guide*, the base estimated sewer flows were based on the sewerage generation factors for residential and commercial categories.[68] The estimate was then adjusted to reflect the 20 percent water conservation mandate pursuant to the LA Green Building Code. The LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008; and meet 50 percent construction waste recycling levels. The HTP has a remaining capacity to treat 88 additional mgd and would have adequate capacity to serve the Project.

Any additional impacts related to wastewater treatment facilities would be further reduced with the following applicable Regulatory Compliance Measure (RCM) **RC-WQ-1** as described in Section 4.17.a. Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

c. *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing*

68 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.

facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described previously, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Furthermore, 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, considering that the site is already 100 percent impervious. Thus, the rate of post-development runoff and pollutants from the parking area would be reduced under the Project. The Project would not create or contribute water runoff that would exceed the capacity of existing or planned stormwater drainage systems.

The potential for increasing surface water runoff would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-3**, which requires the Applicant to submit a Low Impact Development (LID) Plan and/or Standard Urban Storm water Mitigation Plan to the City of Los Angeles Bureau of Sanitation (BOS) Watershed Protection Division for review and approval, where the LID Plan and/or SUSMP shall be prepared consistent with the requirements of the Development Best Management Practices (BMP) Handbook; and **RC-WQ-4**, which requires the Project 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. No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. A significant impact may occur if the Project would increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether 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 build-out; (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 Urban Water Management Plan (UWMP), the City's projected demand for water during dry seasons would be 2,236,000 acre-feet per year (afy) for 2015 and 2,188,000 afy for 2020.[69]

As shown in **Table 4.17-1,** the Project's net increase for water demand would be 16,008 gpd, or 17.93 afy. The Project's net increase for water demand would represent less than 0.1 percent of the City's total demand. As such, the Project would have a less than significant impact on water demand. In addition, pursuant to LAMC, Section 122.03(a), the Project is required to utilize water-saving devices including, but not limited to, urinals equipped with flush-o-meter valves, which flush with a maximum of 1.28 gallons. The Project would also comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures for landscaped areas. Any additional impacts related to wastewater treatment facilities would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-WQ-1** as described in Section 4.17.a.; and **RC-WS-4**, which requires that the Project comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, 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 in **Section 4.17(b)**,

69 City of Los Angeles Department of Public Works. *City of Los Angeles Urban Water Management Plan.* (2011).

the sewage flow will ultimately be conveyed to the HTP, which has sufficient capacity for the Project.[70] Any additional impacts related to wastewater treatment facilities would be further reduced with the following applicable Regulatory Compliance Measure (RCM) **RC-WQ-1** as described in Section 4.17.a. Impacts would less than significant.

Mitigation Measures: Mitigation measures are not required.

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

Less than Significant Impact. A significant impact may occur if the Project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a Project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the Project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the Project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (CiSWMPP), 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, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill serves the existing land uses within the City. This landfill accepts residential, commercial,

70 City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plan, http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

and construction waste. The Sunshine Canyon Landfill currently has a remaining capacity of 74.37 million tons,[71] and an estimated remaining life of 20 years.

The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. The solid waste disposal needs would be directed to the local recycling facilities and landfills described previously. Based on a gross development size of 288,416 square feet of residential and amenity floor area, and a standard waste generation rate of 4.38 pounds/square foot, it is estimated that the construction of the Project would generate approximately 573 tons of debris during the construction process.[72]

As shown in **Table 4.17-3, Expected Operational Solid Waste Generation,** the Project's net generation during the life of the Project would be 1,008 pounds per day. 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. The Project's solid waste would be handled by private waste collection services and would only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. Prior to the issuance of any construction permit, the Applicant would provide a copy of the receipt or contract from a waste disposal company providing services to the Project, specifying recycled waste service(s), to the satisfaction of the Los Angeles Department of Building and Safety. To facilitate on-site separation and recycling of construction-related wastes, the contractor(s) would provide temporary waste separation bins on site during demolition and construction. Additionally, recycling bins would be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material throughout both construction and operations of the Project. These bins would be emptied and the contents recycled accordingly as a part of the Project's regular solid waste disposal program.

The potential for insufficient landfill capacity would be further reduced with the following applicable Regulatory Compliance Measures (RCM) **RC-SW-1** which, pursuant to the LAMC, requires that the project provide a designated recycling area which is readily accessible and serves the entire building; **RC-SW-2**, which requires that the applicant to salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste can be recycled is diverted from the waste stream to be landfilled; and **RC-SW-3** which, in

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71 County of Los Angeles Department of Public Works, *2012 Annual Report, Los Angeles Countywide Integrated Waste Management Plan* (Alhambra, CA: County of Los Angeles Department of Public Works, August 2012).

72 United States Environmental Protection Agency (US EPA), Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, *Estimating 2003 Building-Related Construction and Demolition Materials Amount*, p. 8 (March 2009), http://www.epa.gov/epawaste/conserve/imr/cdm/pubs/cd-meas.pdf.

compliance with AB341, requires that all projects have mandatory recycling and is conducted in accordance with the project's regular solid waste disposal program. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Table 4.17-3
Expected Operational Solid Waste Generation

Type of Use	Size	Waste Generation Rate[a] (lb./unit/day)	Total Solid Waste Generated (lbs/day)
Residential units	241 du	4 lb./du/day	964
Commercial uses	7,291 sq. ft.	0.006 lbs/sq. ft./day	44
Total Project Waste Generation			**1,008**

Notes: du = dwelling unit; sq. ft. =square feet.
a City of Los Angeles Bureau of Sanitation, Solid Waste Generation (1981). Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

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

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

Mitigation Measures: No mitigation measures are required.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

Impact Analysis

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 may occur only if the Project result in a potentially significant impact for any of the cited issues. The Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources and less than significant cultural resource impacts provided the mitigation measures listed previously are implemented. The Project would not degrade the quality of the environment; reduce or threaten any fish or wildlife species (endangered or otherwise); or eliminate important examples of the major periods of California history or prehistory. In fact, the project will be preserving a historic sign by incorporating it into the proposed Project design. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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 with Project Mitigation. As concluded in this analysis, the Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, GHG emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measure **XVIII-10** is proposed to reduce potentially significant impacts to a less than significant level.

XVIII-10 Cumulative Impacts

There may be environmental impacts which are individually limited, but significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. However, these cumulative impacts will be mitigated to a less than significant level though compliance with the above mitigation measures.

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 Project Mitigation. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures stated from **Sections 4.1** through **4.17.** Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Mitigation Measures from **Sections 4.1** through **4.17, in addition to XVIII-20 and XVIII-30** are proposed to reduce potentially significant impacts to a less than significant level.

XVIII-20 Effects on Human Beings

The project has potential environmental effects which cause substantial adverse effects on human beings, either directly or indirectly. However, these potential impacts will be mitigated to a less than significant level through compliance with the above mitigation measures.

XVIII-30 End

The conditions outlined in this proposed mitigated negative declaration which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on the face page of this document. Therefore, it is concluded that no significant impacts are apparent which might result from this project's implementation.

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