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CITY PLANNING

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INITIAL STUDY

WILSHIRE COMMUNITY PLAN AREA

698 New Hampshire Project

Case Number: ZA-2016-1413-VCU-CUB-DB-SPR and VTT-74117
Environmental Case: ENV-2016-1414-MND

Project Location: 698 S. New Hampshire Avenue, Los Angeles, 90005 [656 – 698 S. New Hampshire Avenue (even nos. only) and 3240 W. Wilshire Boulevard]

Council District: 10 - Herb J. Wesson, Jr.

Project Description: VHDG Koreatown, LLC, the "Applicant," is proposing to rehabilitate and adaptively reuse the historically significant 5-story Wilshire Galleria (formerly I. Magnin) Building ("Galleria Building") as a 160-room hotel, and to construct a new 7-story mixed-use building and a 35-story mixed-use high-rise building (Project) at 698 New Hampshire Avenue in the Wilshire Center - Koreatown Community Plan area. The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space (49,744 square-foot) surface parking lot. As part of the adaptive reuse of the Galleria Building, the Applicant would add approximately 8,708 square feet of floor area to the Galleria Building roof, to provide 14 hotel rooms and associated roof-top amenities, with 146 hotel rooms and associated improvements accommodated within the existing floor area of the Galleria Building. The new mixed-use buildings would be constructed within the existing surface parking lot. The 7-story mixed-use building would contain 190 condominium units and approximately 2,270 square feet of ground floor commercial uses, and the 35-story mixed use building would contain 355 condominium units and approximately 2,832 square feet of ground floor commercial uses. Parking for the Project would be provided within above-grade podiums within both of the new buildings. In addition, two levels of subterranean parking levels would be located below the podiums and, at this level, would connect the two new buildings. If approved, construction of the Project could commence in early to mid-2017, with construction activities occurring for approximately 31 months into late 2019 or early 2020. Full build-out and occupancy is anticipated to occur in 2020.

Applicant:	**Prepared By:**	**On Behalf of:**
VHDG Koreatown, LLC 6363 Wilshire Blvd., Suite 600 Los Angeles, CA 90048	ESA PCR 2121 Alton Parkway, Suite 100 Irvine, CA 92606	City of Los Angeles Department of City Planning Expedited Processing Section

TABLE OF CONTENTS
Initial Study

Appendices

List of Figures

List of Tables

City Initial Study/Environmental Checklist

CITY OF LOS ANGELES

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

PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		**COUNCIL DISTRICT:** 10 - Herb J. Wesson, Jr.
PROJECT TITLE: 698 New Hampshire Project	**ENVIRONMENTAL CASE:** ENV-2016-1414-MND	**CASE NO.** ZA-2016-1413-VCU-CUB-DB-SPR and VTT-74117

PROJECT LOCATION: 698 S. New Hampshire Avenue, Los Angeles, 90005 [656 – 698 S. New Hampshire Avenue (even nos. only) and 3240 W. Wilshire Boulevard]

PROJECT DESCRIPTION: The Project is proposing to rehabilitate and adaptively reuse the historically significant 5-story Wilshire Galleria (formerly I. Magnin) Building ("Galleria Building") as a 160-room hotel, and to construct a new 7-story mixed-use building and a 35-story mixed-use high-rise building (Project) at 698 New Hampshire Avenue in the Wilshire Center - Koreatown Community Plan area. The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space (49,744 square-foot) surface parking lot. As part of the adaptive reuse of the Galleria Building, the Applicant would add approximately 8,708 square feet of floor area to the Galleria Building roof, to provide 14 hotel rooms and associated roof-top amenities, with 146 hotel rooms and associated improvements accommodated within the existing floor area of the Galleria Building. The new mixed-use buildings would be constructed within the existing surface parking lot. The 7-story mixed-use building would contain 190 condominium units and approximately 2,270 square feet of ground floor commercial uses, and the 35-story mixed use building would contain 355 condominium units and approximately 2,832 square feet of ground floor commercial uses. Parking for the Project would be provided within above-grade podiums within both of the new buildings. In addition, two levels of subterranean parking levels would be located below the podiums and, at this level, would connect the two new buildings. If approved, construction of the Project could commence in early to mid-2017, with construction activities occurring for approximately 31 months into late 2019 or early 2020. Full build-out and occupancy is anticipated to occur in 2020.

The following discretionary approvals are requested and included as part of the Project: 1) Site Plan Review; 2) Density Bonus Conformance Review for an approximately 35 percent density bonus with the provision of 11 percent very-low income housing units with on-menu incentives for increased FAR and density/FAR averaging; 3) Conditional Use Permit for the on-site sales and consumption of alcoholic beverages at a hotel, two restaurant/lounges within the hotel, and a restaurant in the high-rise mixed-use building; 4) Vesting Conditional Use Permit for a mixed use development in an R5 zone in a redevelopment area (Sec. 12.24 W.15 & 12.24 T); 5) Vesting Conditional Use Permit for hotel within 500 feet of a residential zone; 6) Vesting Tentative Tract Map No. 74117 for a two lot subdivision containing 545 condominium units with a request for haul route approval and to designate New Hampshire Avenue as front yard for each lot ; 7) Construction permits, including building, grading, excavation, foundation, and associated permits; 8) Haul Route Permit, as may be required; and 9) Other approvals as needed. Attachment A, Project Description, provides a detailed description of the proposed Project.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

VHDG Koreatown, LLC

6363 Wilshire Blvd., Suite 600
Los Angeles, CA 90048

FINDING:

The Department of City Planning of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this Project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED
THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	**TITLE**	**TELEPHONE NUMBER**
Jenna Monterrosa	City Planner	(213) 978-1377
ADDRESS 200 N. Spring Street, Room 763 , Los Angeles, CA 90012	**SIGNATURE (Official)** Nicholas Hendricks **Senior City Planner**	**DATE** 11-16-16

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY and CHECKLIST

(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** 10 - Herb J. Wesson, Jr.	**DATE:** 10-27-16
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2016-1414-MND	**RELATED CASES:** ZA-2016-1413-VCU-CUB-DB-SPR and VTT-74117	
PREVIOUS ACTIONS CASE NO.: N/A	☐ Does have significant changes from previous actions. ☒ Does NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

The Project is proposing to rehabilitate and adaptively reuse the historically significant 5-story Wilshire Galleria (formerly I. Magnin) Building ("Galleria Building") as a 160-room hotel, and to construct a new 7-story mixed-use building and a 35-story mixed-use high-rise building (Project) at 698 New Hampshire Avenue in the Wilshire Center - Koreatown Community Plan area. The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space (49,744 square-foot) surface parking lot. As part of the adaptive reuse of the Galleria Building, the Applicant would add approximately 8,708 square feet of floor area to the Galleria Building roof, to provide 14 hotel rooms and associated roof-top amenities, with 146 hotel rooms and associated improvements accommodated within the existing floor area of the Galleria Building. The new mixed-use buildings would be constructed within the existing surface parking lot. The 7-story mixed-use building would contain 190 condominium units and approximately 2,270 square feet of ground floor commercial uses, and the 35-story mixed use building would contain 355 condominium units and approximately 2,832 square feet of ground floor commercial uses. Parking for the Project would be provided within above-grade podiums within both of the new buildings. In addition, two levels of subterranean parking levels would be located below the podiums and, at this level, would connect the two new buildings. If approved, construction of the Project could commence in early to mid-2017, with construction activities occurring for approximately 31 months into late 2019 or early 2020. Full build-out and occupancy is anticipated to occur in 2020.

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ENVIRONMENTAL SETTING:

The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing 5-story Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space surface parking lot. The Project vicinity is highly urbanized and includes established neighborhoods, as well as recent mid- and high-rise mixed-use developments. The immediate neighborhood is served by Metro's Wilshire/Vermont Station (subway-rail) for the Red and Purple Lines, located approximately 275 feet to the northeast of the Project Site.

PROJECT LOCATION: 698 New Hampshire Avenue, Los Angeles, 90005. [656 – 698 S. New Hampshire Avenue (even nos. only) and 3240 W. Wilshire Boulevard]

COMMUNITY PLAN AREA: Wilshire **STATUS:** ☐ Preliminary ☒ Does Conform to Plan ☐ Proposed ☐ Does NOT Conform to Plan ☒ ADOPTED in 2001	**AREA PLANNING COMMISSION:** Central	**CERTIFIED NEIGHBORHOOD COUNCIL:** Wilshire Center - Koreatown
EXISTING ZONING: C4-2 and R5-2	**MAX DENSITY ZONING:** FAR 6:0	
GENERAL PLAN LAND USE: Regional Center Commercial	**MAX DENSITY PLAN:** FAR 6:0	
	PROPOSED PROJECT DENSITY: 6.83:1 FAR and 545 Dwelling Units (with incentives)	

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	(213) 978-1377
	Title	Phone

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," 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 16063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

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

6. Lead agencies are encouraged to incorporate 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 "Less Than Significant Impact With Mitigation Incorporated" as indicated by the checklist on the following pages.

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

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

Background

PROPONENT NAME:
VHDG Koreatown, LLC

PHONE NUMBER:
(323) 658-1511

APPLICANT ADDRESS:
6363 Wilshire Blvd., Suite 600
Los Angeles, CA 90048
ATTN: Marc Annotti

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
October 2016

PROPOSAL NAME (if Applicable):
698 New Hampshire Project

		Potentially significant impact	Less than significant impact with mitigation incorporated	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 ATTACHMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
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?	☐	☐	☒	☐
2. AGRICULTURAL AND FORESTRY 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 THE EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	☐	☐	☐	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 12220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	☐	☐	☐	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	☐	☐	☐	☒
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE?	☐	☐	☐	☒
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 (OZONE, CARBON MONOXIDE, & PM 10) UNDER AND APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	☐	☐	☒	☐
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	☐	☐	☒	☐
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	☐	☐	☒	☐
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?	☐	☐	☐	☒

		Potentially significant impact	Less than significant impact with mitigation incorporated	Less than significant impact	No impact
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 (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	☐	☐	☒	☐
f.	CONFLICT WITH THE PROVISIONS OR AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	☐	☐	☐	☒
5. CULTURAL RESOURCES					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA '15064.5?	☐	☒	☐	☐
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA '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?	☐	☒	☐	☐
e.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE AS DEFINED IN PUBLIC RESOURCES CODE SECTION 21074?	☐	☒	☐	☐
6. GEOLOGY AND SOILS					
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
i.	RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	☐	☐	☐	☒
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?	☐	☐	☒	☐

		Potentially significant impact	Less than significant impact with mitigation incorporated	Less than significant impact	No impact
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	☐	☐	☐	☒
7. GREENHOUSE GAS EMISSIONS					
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?	☐	☐	☒	☐
8. HAZARDS AND HAZARDOUS MATERIALS					
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS?	☐	☐	☒	☐
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	☐	☐	☒	☐
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	☐	☐	☒	☐
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	☐	☐	☒	☐
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD 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 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?	☐	☐	☐	☒
9. HYDROLOGY AND WATER QUALITY					
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 OFF-SITE?	☐	☐	☐	☒

		Potentially significant impact	Less than significant impact with mitigation incorporated	Less than significant impact	No impact
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 OFF-SITE?	☐	☐	☐	☒
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, INJURY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	☐	☐	☐	☒
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	☐	☐	☐	☒
10. LAND USE AND PLANNING					
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?	☐	☐	☐	☒
11. MINERAL RESOURCES					
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?	☐	☐	☐	☒
12. NOISE					
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

		Potentially significant impact	Less than significant impact with mitigation incorporated	Less than significant impact	No impact
XII. POPULATION AND HOUSING					
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?	☐	☐	☐	☒
14. PUBLIC SERVICES					
a.	FIRE PROTECTION?	☐	☐	☒	☐
b.	POLICE PROTECTION?	☐	☐	☒	☐
c.	SCHOOLS?	☐	☐	☒	☐
d.	PARKS?	☐	☐	☒	☐
e.	OTHER GOVERNMENTAL SERVICES (INCLUDING ROADS)?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
16. TRANSPORTATION/CIRCULATION					
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?	☐	☐	☒	☐
17. UTILITIES					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	☐	☐	☒	☐
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OR NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	☐	☐	☒	☐

		Potentially significant impact	Less than significant impact with mitigation incorporated	Less than significant impact	No impact
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?	☐	☐	☒	☐
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	☐	☐	☒	☐
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?	☐	☐	☒	☐
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 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? CUMULATIVE 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 of necessary)

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

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

The project as identified in the project description may cause potentially significant impacts on the environment 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-2016-1414-MND and the associated case(s) ZA-2016-1413-VCU-CUB-DB-SPR and VTT-74117. Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impact(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 above 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.

PREPARED BY:	**TITLE:**	**TELEPHONE NO.:**	**DATE:**
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MITIGATION MEASURES (MM) AND PROJECT DESIGN FEATURES (PDF)

AESTHETICS (Project Design Features)

PDF AES-1 Outdoor lighting shall be designed and installed with shielding, such that the light source does not illuminate adjacent residential properties, the public right-of-way, nor from above.

PDF AES-2 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

AGRICULTURE AND FORESTRY RESOURCES

No mitigation measures are required.

AIR QUALITY (Project Design Features)

PDF AIR-1 Construction Measures: The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower (hp) to 89 hp and the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 90 hp or greater during Project construction. Equipment, such as air compressors, concrete/industrial saws, tower cranes, welders and pumps shall be electric or alternative fueled (i.e., non-diesel). To the extent possible, pole power will be made available for use with electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

PDF AIR-2 Fireplaces: The Project shall not include wood-burning or natural gas-fueled residential fireplaces.

PDF AIR-3 Commercial Trash Receptacles: 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.

BIOLOGICAL RESOURCES (Mitigation Measures)

MM BIO-1 The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways.

1. Construction activities with the potential to disturb nesting birds shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed. If construction activities are outside of the nesting season, then No. 2 below is not needed. If construction activities that could impact nesting birds occur during the nesting season, then No. 2 below shall

be implemented.

2. Any construction activities that occur during the nesting season shall require that all suitable habitat (i.e., street trees) be thoroughly surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Building and Safety. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors) shall be delineated, flagged, and avoided until the until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

   If the biologist determines that a narrower buffer between the Project construction activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the City and, upon request, the California Department of Fish and Wildlife Service. Based on the submitted information, the City (and the Department, if the Department requests) shall determine whether to allow a narrower buffer.

CULTURAL RESOURCES (Mitigation Measures)

MM HIST-1

Rehabilitation and Construction Monitoring. To protect and preserve the integrity of the Galleria Building as a historical resource, a Rehabilitation Plan shall be prepared by a qualified preservation consultant ("Preservation Consultant") retained by the applicant to inform the design and oversee implementation of the Rehabilitation Plan so that the Project conforms with the Secretary of the Interior's Standards for Rehabilitation. The Preservation Consultant shall meet the Secretary of the Interior's professional qualification standards in history, architectural history or historic architecture, with at least 10 years of experience conducting similar projects. The Preservation Consultant shall prepare a Rehabilitation Plan for the proposed adaptive reuse of the Galleria Building which is consistent with the analysis, identified impacts and findings of the Historical Resources Assessment Report and Environmental Impact Analysis, prepared by ESA PCR in July 2016 (collectively the "Historic Assessment"), review the design and construction plans to verify the Project's conformance with the Standards and Historic Assessment, and prepare draft and final plan review letters for submittal to the City Planning Department, Office of Historic Resources. The Rehabilitation Plan shall retain and preserve the character-defining features as identified and documented in the Historic Assessment and include appropriate recommendations for the treatment of these features. Once design and construction plans have been prepared, and prior to issuance of a building permit, the Preservation Consultant shall review the Project for conformance to the Standards and Historic Assessment, and provide a final plan review letter summarizing the review findings to the City Planning Department, Office of Historic Resources. Once the Project has been approved by the City, the Preservation Consultant shall visually inspect construction associated with the Galleria Building at regular intervals to address any unanticipated discoveries that may require preservation treatment, ensure Project conformance with the Standards and Historic Assessment, and minimize potential damage to historic

fabric. The Preservation Consultant shall document the construction monitoring process in digital photography as well as monitoring logs, and prepare a final monitoring report to be submitted to the City Planning Department, Office of Historic Resources.

MM HIST-2 **HABS Level II Report**. It is also recommended that the existing conditions of the Galleria Building be recorded in a HABS Level II report which would serve as a base line reference for the Project and any other future work that may be undertaken for the building. The HABS would record character-defining architecture, spaces, elements and features of the Project Site, photographically in professional archival large format 4" x 5" black-and-white photographs, provide a detailed architectural description of the building along with a narrative history of construction, alterations, and statement of significance. The HABS Level II report would include supplementary color 35mm photographs of architectural details, materials and features to record color, materials and texture not apparent in black-and-white photographs. Supplementary materials shall also include archivally reproduced historic photographs, historic illustrations and advertisements, and historic architectural plans depicting the historic appearance of the property during the period of significance. The HABS Level II report would document existing conditions including those portions of the building to be demolished as well as the portions of the building to be retained. The HABS Level II report would reduce the potential impacts of removal of remaining interior features, any alterations of the Galleria Building. The HABS Level II report should be archivally produced and deposited in a publically accessible library or museum archive such as the Library of Congress, Los Angeles Public Library, and the City of Los Angeles Office of Historic Resources.

MM ARCH-1 The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the archaeological monitor.

MM ARCH-2 In the event that archaeological resources (e.g., bottles, foundations, refuse dumps/privies, Native American artifacts, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist. The Applicant shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. In preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the

archaeological material, they shall be donated to a local school, historical society, or other organization in the area for educational purposes.

MM ARCH-3 The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

MM PALEO-1 A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older sedimentary deposits from the Puente Formation and/or older Quaternary alluvium. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older sedimentary deposits from the Puente Formation and/or older Quaternary alluvium. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor.

MM PALEO-2 If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources form the Project Site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school, historical society, or other organization in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

MM PALEO-3 The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

MM HR-1 If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

MM TCR-1 The Applicant shall retain a Native American tribal monitor from a Gabrielino group who shall be present during construction excavations (e.g., demolition, clearing/grubbing, grading, and trenching) associated with the Project. The frequency of monitoring shall be determined by the tribal monitor, who shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time tribal monitoring may be reduced to part-time inspections if determined adequate by the Native American monitor. If prehistoric archaeological or tribal cultural resources are encountered during construction, the Native American monitor shall advise the Applicant and

archaeologist regarding the treatment and curation of the resources as described in MM ARCH-2. As discussed in MM ARCH-2, the archaeological monitor shall have the authority to halt or divert ground-disturbing activities away from the vicinity of the find so that it can be evaluated and a subsequent treatment plan be prepared and implemented. The tribal monitor shall advise the archaeological monitor regarding decisions to halt or divert work from the vicinity of a find.

GEOLOGY AND SOILS

No mitigation measures are required.

GREENHOUSE GAS EMISSIONS (Project Design Features)

PDF GHG-1 The Project would be designed to optimize energy performance and reduce building energy cost by a minimum of five (5) percent compared to the Title 24 (2016) Building Standards Code.

PDF GHG-2 The parking structure would be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones. A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls. For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for parking structure lighting.

GREENHOUSE GAS EMISSIONS (Mitigation Measures)

MM GHG-1 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.

HAZARDS AND HAZARDOUS MATERIALS (Mitigation Measures)

MM HAZ-1 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.

HYDROLOGY AND WATER QUALITY

No mitigation measures are required.

LAND USE AND PLANNING

No mitigation measures are required.

MINERAL RESOURCES

No mitigation measures are required.

NOISE (Mitigation Measures)

MM NOISE-1 Noise-generating equipment operated at the Project Site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2 The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that includes permitted construction days and hours.

MM NOISE-3 Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously.

MM NOISE-4 Temporary noise barriers shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) at all times during Project construction. Noise barriers shall be a minimum of 16-foot tall along the west, south, and north boundaries, which direct lines of sight to adjacent residential uses.

MM NOISE-5 An acoustical analysis by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window, and door) would provide adequate sound insulation to meet the acceptable interior noise level performance standard of 45 dBA CNEL.

MM NOISE-6 To minimize noise associated with Project parking operations: concrete, not metal, shall be used for construction of parking ramps; and the interior ramps shall be textured to prevent tire squeal at turning areas.

MM NOISE-7 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.

MM NOISE-8 To avoid or minimize potential construction vibration damage to finish materials on the Galleria Building, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on the Galleria Building. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.45 inches per second at the face of the building and a regulatory alarm level equivalent to 0.5 inches per second at the face of the building. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be

undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the Galleria Building visually inspected for damage. Results of the inspection must be logged. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior's Standards.

POPULATION AND HOUSING

No mitigation measures are required.

PUBLIC SERVICES (Project Design Features)

PDF PS-1 Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF PS-2 The Project plans would incorporate 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. The design would consider guidelines per the "Design out Crime Guidelines: Crime Prevention Through Environmental Design" published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 150 N. Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. These measures would be approved by the LAPD prior to issuance of building permits.

RECREATION

No mitigation measures are required.

TRANSPORTATION/TRAFFIC (Project Design Features)

PDF TRAF-1 The Applicant shall prepare a detailed Transportation Management Plan that will detail Project traffic reduction measures for the commercial, hotel and residential components of the Project. Components of the Plan shall include:

1. Improve the existing bus stops at the northwest and southwest corners of Wilshire Boulevard/ Vermont Avenue; and at the east, north, and south sides of Vermont Avenue/ 7th Street by providing weather protected covered benches.

2. Highlight the multiple transit and cycling opportunities in the immediate area within the hotel area to promote alternates to vehicle transportation. Items such as a kiosk, flyers and concierge service shall be utilized to promote these opportunities.

3. Provide an on-site TDM manager to assist in matching rideshare partners, determining transit routes, and promoting TDM program.

4. Provide access pass and transit pass reductions for residents and employees of the commercial retail and hotel venues.

5. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the hotel and retail commercial components.

6. Provide car sharing service for residents and/or commercial employees that rideshare.

7. Provide bicycle sharing service for residents and/or commercial employees use.

8. Provide some commercial components that are neighborhood serving and easily accessible and visible to the major streets to encourage walking as an alternative to single occupant vehicles.

UTILITIES/SERVICE SYSTEMS (Project Design Features)

PDF UTIL-1

The Applicant has voluntarily committed to implement the following water conservation measures that are beyond those required by law:

- Waterless Urinals
- Residential Lavatory Faucets with flow rate of 1.0 gallons per minute or less
- Showerheads with flow rate of 1.5 gallons per minute or less
- High Efficiency Toilets with flush volume of 0.8 gallon of water per flush
- Cooling Tower Conductivity Controllers for Cooling Tower pH Conductivity Controllers
- Water-Saving Pool Filter
- Pool/Spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Leak Detection System for swimming pools and Jacuzzi
- Installation of a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Zoned Irrigation
- Landscaping Contouring to minimize precipitation runoff
- Artificial Turf
- Rainwater Harvesting

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 end a level of insignificance by imposing the above mitigation measures.

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.

Attachment A
Project Description

INITIAL STUDY
Attachment A: Project Description

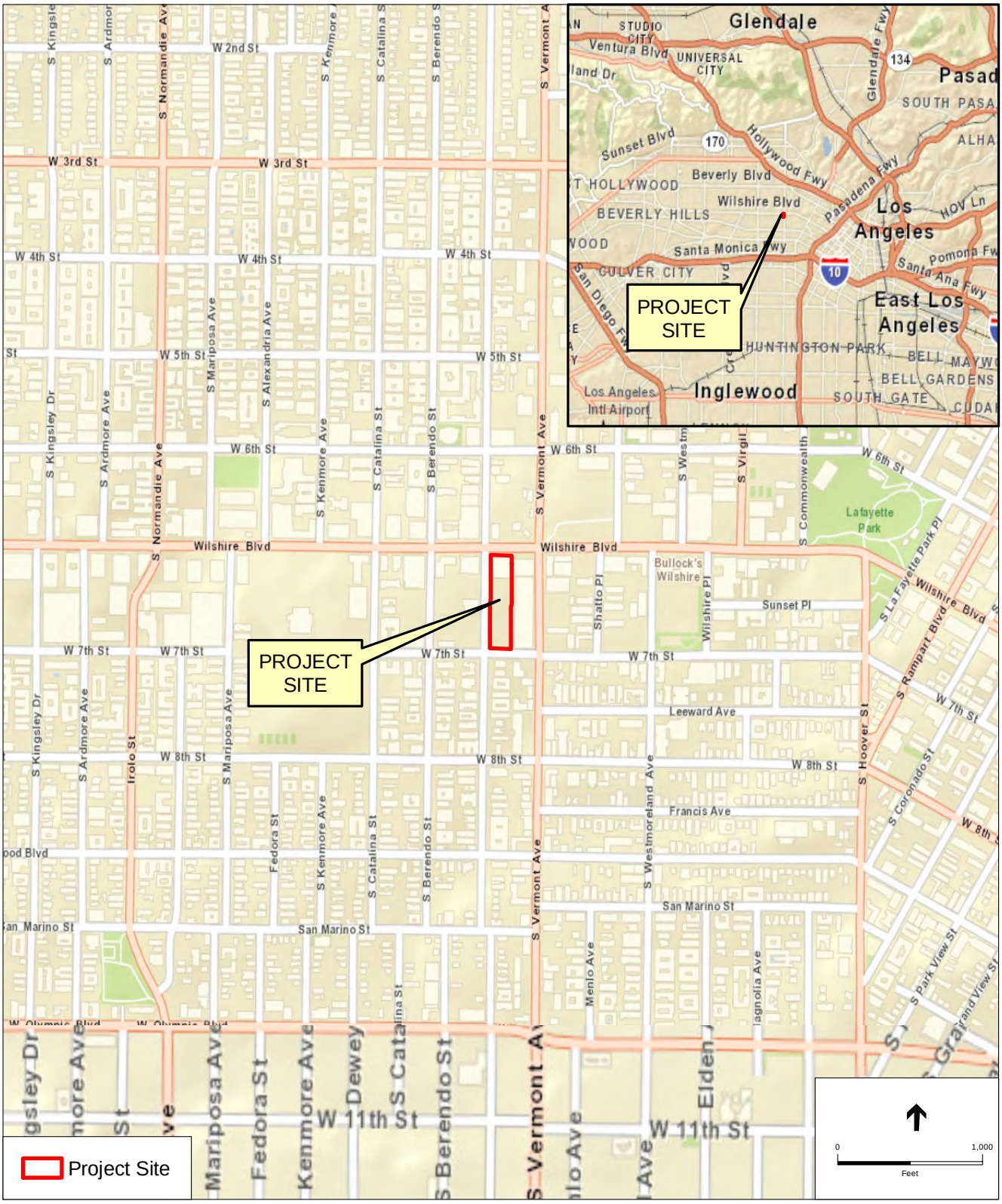
A. Introduction

VHDG Koreatown, LLC, the "Applicant," is proposing to rehabilitate and adaptively reuse the historically significant 5-story Wilshire Galleria (formerly I. Magnin) Building ("Galleria Building") as a 160-room hotel, and to construct a new 7-story mixed-use building and a 35-story mixed-use high-rise building (Project) at 698 New Hampshire Avenue in the Wilshire Center - Koreatown Community Plan area. The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space (49,744 square-foot) surface parking lot. As part of the adaptive reuse of the Galleria Building, the Applicant would add approximately 8,708 square feet of floor area to the Galleria Building roof, to provide 14 hotel rooms and associated roof-top amenities, with 146 hotel rooms and associated improvements accommodated within the existing floor area of the Galleria Building. The new mixed-use buildings would be constructed within the existing surface parking lot. The 7-story mixed-use building would contain 190 condominium units and approximately 2,270 square feet of ground floor commercial uses, and the 35-story mixed use building would contain 355 condominium units and approximately 2,832 square feet of ground floor commercial uses. Parking for the Project would be provided within above-grade podiums within both of the new buildings. In addition, two levels of subterranean parking levels would be located below the podiums and, at this level, would connect the two new buildings.

B. Project Location and Surrounding Uses

The Project vicinity includes established and recent mid- and high-rise commercial development, older multi-family neighborhoods, churches, schools, parks, and more recently constructed mixed-use residential/commercial complexes. The immediate neighborhood is served by Metro's Wilshire/Vermont Station (subway-rail) for the Red and Purple Lines, located approximately 275 feet to the northeast of the Project Site. Other regional access includes the Hollywood Freeway (US Route 101) located approximately 1.3 miles to the north. The Project Site is also served by Metro Bus Lines 20, 204, 720 754, and Foothill Transit lines 481. In the future, the Purple Line would be extended farther west along Wilshire Boulevard to provide convenient access to more destinations to the west.

The general vicinity and relationship of the Project Site to surrounding streets and highways is illustrated in **Figure A-1**, *Regional and Project Vicinity Map*. Surrounding land uses are shown in **Figure A-2**, *Aerial View of the Project Site and the Surrounding Uses.* Surrounding land uses shown in Figure A-2 are discussed below.



SOURCE: ESRI Street Map, 2009.

698 New Hampshire

Figure A-1

Regional and Project Vicinity Map

ESA PCR

SOURCE: Google Maps, 2015 (Aerial).

698 New Hampshire

Figure A-2

Aerial Photograph and Surrounding Land Uses

ESA PCR

1. Land Uses to the North

Land uses immediately north of the Project Site are primarily commercial in nature. The 6-story office building for the Consulate General for the Republic of Korea (3243-3245 Wilshire Boulevard) is located at the northeast corner of Wilshire Boulevard and New Hampshire Avenue, directly north of the Project Site. A surface parking lot is located to the east side of this building, and a Shell gas station is located to the east of the parking lot, at the northwest corner of Wilshire Boulevard and Vermont Avenue. The majority of the block bounded by Wilshire Boulevard, New Hampshire Avenue, 6th Street, and Vermont Avenue is dominated by surface parking lots and two or three low-rise businesses, such as a Denny's Restaurant. However, a 7-story, 177-unit apartment building is nearing completion at 685 New Hampshire Avenue to the north of the Project Site, and the proposed Korean American Museum Project at 6th Street and Vermont Avenue includes a 103-unit, 7-story residential component.

Land uses to the north of the Project Site on Wilshire Boulevard also include the 15-story Wilshire Center Building (3255 Wilshire Boulevard) at the northwest corner of Wilshire Boulevard and New Hampshire Avenue. This building is primarily offices with ground-level retail and a 4-level parking podium. The remainder of the block bounded by Wilshire Boulevard, New Hampshire Avenue, 6th Street, and S. Berendo Street is dominated by surface parking lots and numerous low-rise commercial structures.

The Wilshire/Vermont Metro Station is located at the northeast corner of the Wilshire Boulevard and Vermont Avenue, directly across Vermont Avenue from a gas station. A 7-story, 180-unit mixed-use complex, with ground-level retail and restaurants is developed around the Metro Station.

2. Land Uses to the East

Land uses immediately east of the Project Site, which share the same block occupied by the Project Site, include the 18-story South Tower (695 Vermont Avenue) and the 16-story North Tower (3200 Wilshire Boulevard) of the Towers on Wilshire complex. The South Tower is oriented toward Vermont Avenue and 7th Street, while the North Tower is oriented toward Vermont Avenue and Wilshire Boulevard. A 5-level parking structure accessed from Vermont Avenue divides the two buildings. No other structures or uses are located within the block bordered by Vermont Avenue, Wilshire Boulevard, New Hampshire Avenue, and 7th Street.

The 29-story and 23-story, 464-unit mixed-use complex known as "The Vermont" is located at the southeast corner of Wilshire Boulevard and Vermont Avenue to the east of the Project Site. This complex, which extends along Wilshire Boulevard between Vermont Avenue and Shatto Place, is developed over a 7- to 8-level parking podium. Commercial offices and street-oriented retail and restaurants face The Vermont's Wilshire Boulevard and Vermont Avenue frontages. A surface parking lot and building containing a barber shop and restaurant are located at the northeast corner of Vermont Avenue and 7th Street to south of The Vermont complex, to the east of the Project Site.

3. Land Uses to the South

Land uses to the south of the Project Site, south of 7th Street, include established residential neighborhoods, including 2- to 5-story multi-family homes. Street parking is allowed along the residential streets and most blocks are served by rear-lot alleyway access. A mini-mall with a surface parking lot and a prominent billboard is located at the south side of 7th Street, to the east of the alley. The Cornelius B. Penberth Child Study Center/ Children's Institute is located to the south of the Project Site at the southwest corner of 7th Street and New Hampshire Avenue.

4. Land Uses to the West

The approximate 22-story, 3250 Wilshire Building is located at the southwest corner of Wilshire Boulevard and New Hampshire Avenue directly west of the Project Site. A mid-rise building, to the south and part of the 3250 Wilshire Building, include offices and interior parking. A seven-story apartment building at 685 New Hampshire Avenue is located at the northwest corner of 7th Street and New Hampshire Avenue, directly across the street, to the west of the Project Site. The 24-acre Robert F. Kennedy Community Schools campus is located between Wilshire Boulevard and 8th Street, two blocks west of the Project Site. The 34-story, Equitable Plaza Building is located across Wilshire Boulevard from the Community Schools campus.

C. Existing Conditions

The Project Site is currently occupied by the Galleria Building and a 155-space (49,744 square-feet) paved surface parking lot. The Galleria Building contains approximately 128,757 square feet of floor area, including the following: approximately 26,008 square feet of commercial offices, 10,314 square feet of medical office uses, 22,475 square feet of a quality restaurant, 1,823 square feet of high-turnover restaurant, 22,475 square feet of spa, 19,524 square feet of retail space and 26,138 square feet of vacant retail space.

The former I. Magnin Department Store, known for couture fashions, specialty goods and foods, and tea room (Blum's Restaurant and Sweets), opened in 1939. The Galleria Building was designed by Southern California architect Myron Hunt and was well received by reviewers for its white marble upper stories and polished black granite first story. The I. Magnin store closed in 1990 and reopened in 1992 as the Wilshire Galleria. The Galleria Building is currently a designated City of Los Angeles Historic-Cultural Monument (HCM-534).

The Galleria Building's marble and granite exterior walls remained intact during the transition to the Wilshire Galleria. The Galleria Building maintains a strong sidewalk presence with the black granite and white marble exteriors and large display windows along both Wilshire Boulevard and New Hampshire Avenue. However, in recent years, the display windows and entrance alcove are used primarily for signs (including neon window displays) and posters. The primary pedestrian entrance to the Galleria Building is via a *porte cochere* at the south side of the building. During the transition to the Wilshire Galleria, the majority of changes to the Galleria Building occurred in the interior space. The formerly open ground floor was divided into four principal retail spaces, and the southeast and southwest corners were partitioned to create a coffee shop and other retail

uses. New display and ceiling light fixtures were added. The third floor was extensively altered to create a movie theater in the west section and a kitchen in the east section. However, unique octagonal, round, and rectangular spaces on the 3rd floor from the original department store were retained. No original features remain on the 2nd, 4th, and 5th floors, which were converted to office space. At some point, the original patio on the 5th floor, which opened to the sky, was enclosed and converted to offices.

The surface parking lot at the south side of the Galleria Building takes access via two driveways on New Hampshire Avenue. Loading is available via the mid-block alley running between Wilshire Boulevard and 7th Street. Sidewalks on Wilshire Boulevard, New Hampshire Avenue and 7th Street are lined with mature trees. Although the surface parking lot and edge of the alley are not landscaped, the Galleria Building's *porte cochere* entrance is heavily -landscaped with trees and shrubs. No protected trees occur within the Project Site. Overall, approximately 8,500 square of landscaped area occurs on the Project Site.

D. Planning and Zoning

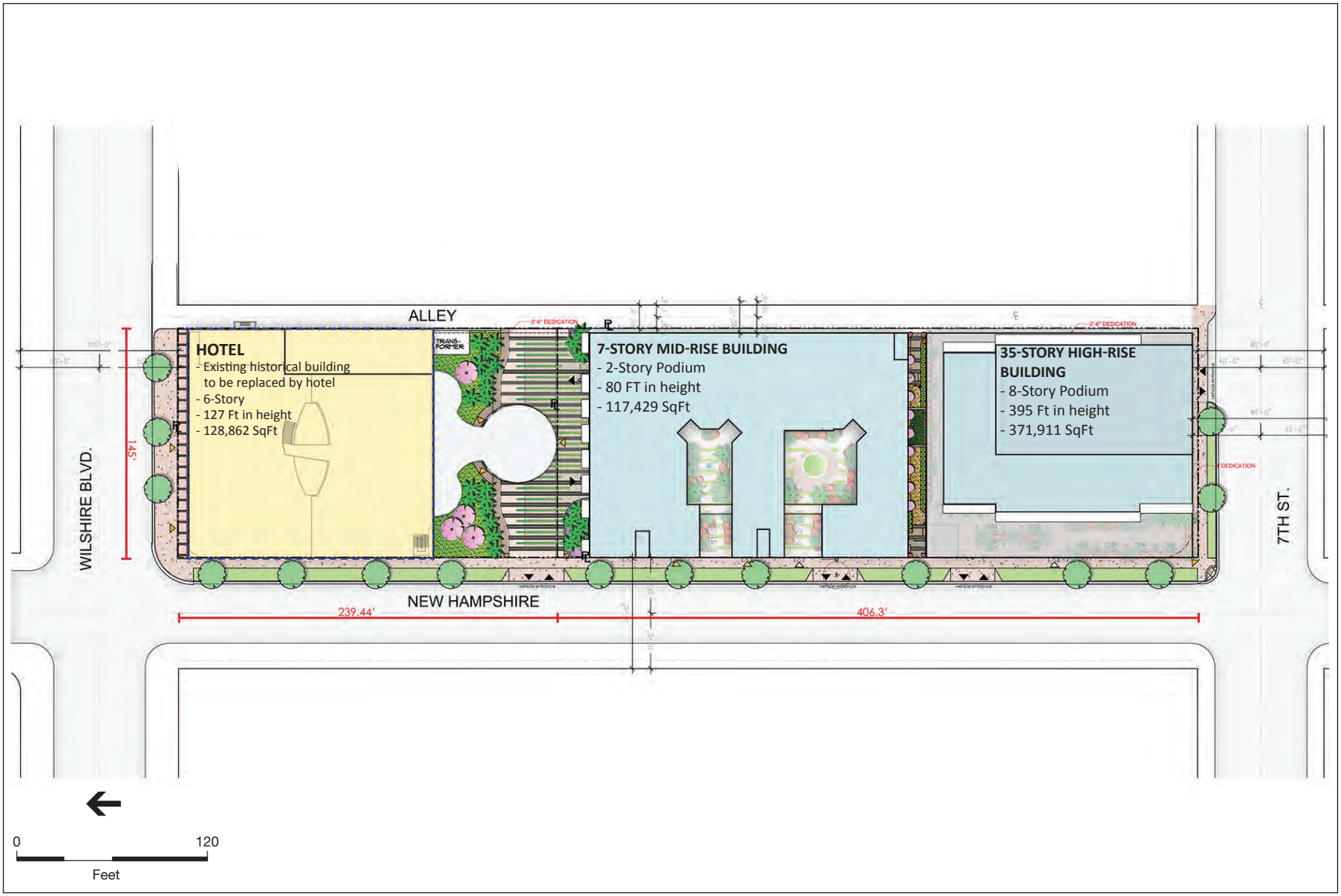
The Project Site is located within the Wilshire Community Plan Area, and has a land use designation of Regional Center Commercial. The Project Site has two different zoning classifications. The portion of the Project Site containing the Galleria Building is zoned C4-2 and the *porte cochere* and surface parking lot is zoned R5-2. The C4-2 and R5-2 zoning designations allow for commercial and high-density residential development, and do not establish building height limitations. The Project Site is also located within a Los Angeles State Enterprise Zone and the Wilshire /Koreatown Recovery Redevelopment Project. The purpose of the latter plan is to encourage economic opportunity, improvements in housing, and upgrades in neighborhood quality with new or repurposed development.

E. Description of Proposed Project

The Project layout and relative location of Project components are illustrated in **Figure A-3**, *Project Site Plan*. As shown in Figure A-3, the Galleria Building is located in the north sector of the Project Site, with a stronger orientation toward Wilshire Boulevard and the residential mixed-use buildings would be located in the central and south portions of the site and oriented more strongly toward New Hampshire Avenue and 7th Street. **Figure A-4**, *Simulated Aerial View of the Project*, provides a conceptual drawing and approximate scale of the Project's new mixed-use components and the restored/expanded Galleria Building within the existing urban setting.

1. Hotel Building

Under the Project, the Galleria Building would be converted into a 160-room hotel. One hundred forty-six hotel rooms would be constructed within the building's approximate 128,757 square feet of floor area contained in the 2nd through 5th floors, with an additional 14 hotel rooms (for a total of 160) and a recreation/observation deck for the hotel constructed on a new 6th floor that would be added to the building.



SOURCE: Archeon Group, 2016

698 New Hampshire

Figure A-3
Project Site Plan

ESA PCR

SOURCE: Archeon Group, 2016

698 New Hampshire

Figure A-4
Simulated Aerial View of the Project

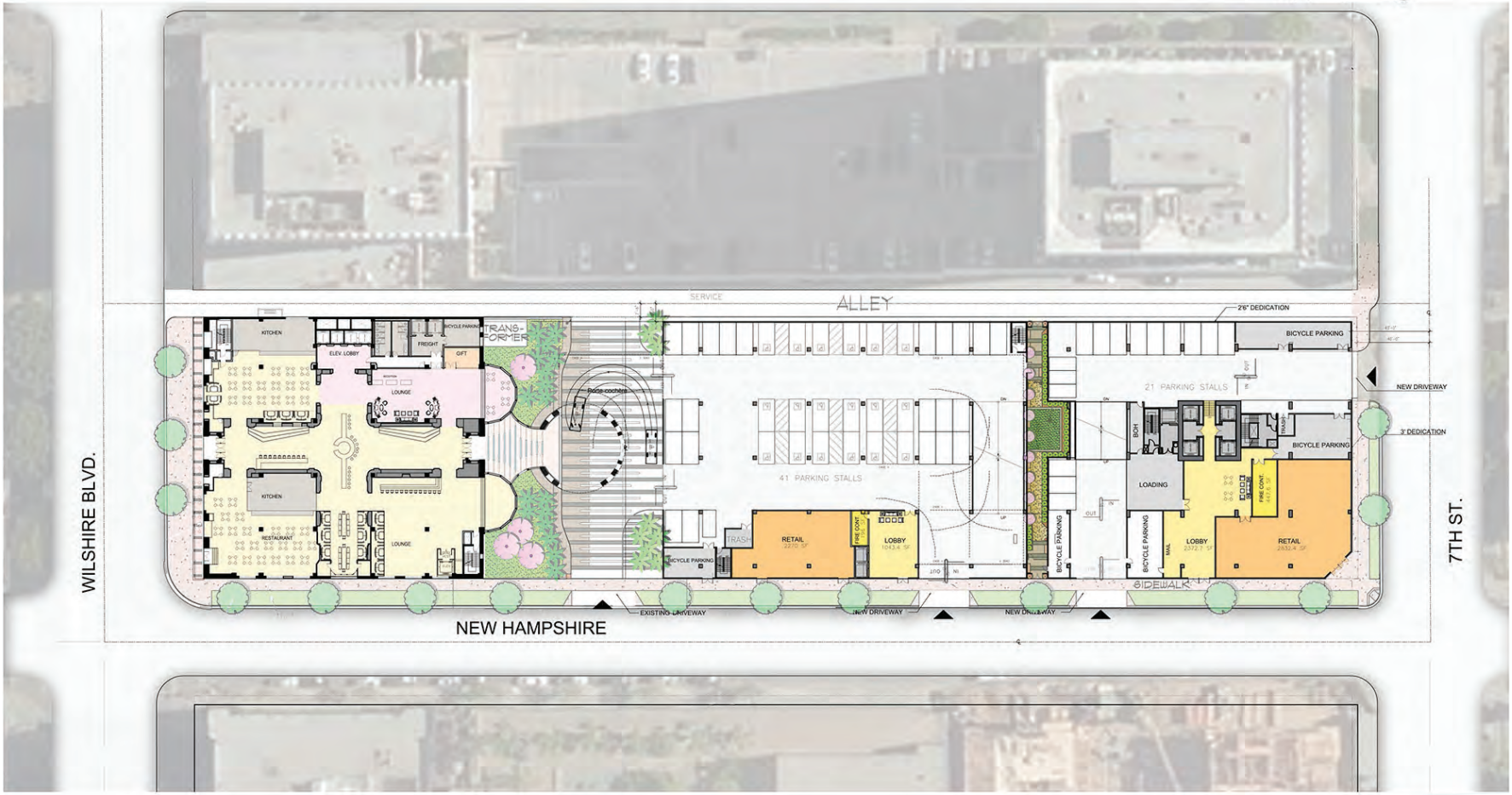
ESA PCR

The ground floor hotel would include the hotel lobby, one restaurant with a kitchen, a second dining area with a kitchen, and two lounges, one of which comprises the reception area. The ground level would also include a gift shop near the reception area and bicycle parking. The *porte cochere* for the Galleria Building would be retained, but a small enclosed loading dock, added in 2003 at the southeast corner of the building, would be removed. However, the east side of the motor court next to the alley area would be used as a loading area. The *porte cochere* would be accessed via the motor court/driveway from New Hampshire Avenue.

Existing partitions on the ground floor would be removed to bring back the ground floor's original spatial character. Entry doors at the north and south sides of the hotel would allow direct pedestrian access to the center hall from Wilshire Boulevard and from the auto court and parking structure to the south of the Galleria Building. The parking for the hotel would be located within the subterranean garage below the proposed mid-rise building. The hotel's dining room and a separate restaurant, accessed from the center hall, would be located along the hotel's Wilshire Boulevard frontage. The two eating areas would have separate kitchens, and the restaurant located at the corner of Wilshire Boulevard/New Hampshire Avenue would have a separate entrance from Wilshire Boulevard. Outdoor space would also be provided along Wilshire Boulevard for sidewalk dining near the proposed restaurant. The entrance doors would be glass and existing display windows would be retained to allow visibility into the hotel interior, including dining areas and a lounge from the Wilshire Boulevard and New Hampshire Avenue sidewalks. The hotel's ground floor lounges, elevator lobby, and reception desk would also be accessed off the center hall. The Project would remove existing obstructions and signage from the Galleria Building's existing ground level display windows. First floor uses and layout for the hotel and other ground floor uses are illustrated in **Figure A-5**, *Ground Floor Plan*.

The mechanical room would continue to be located in the basement, and the existing spa, which will be renovated/upgraded and accessible to the general public, would continue operations in the hotel basement. The spa includes exercise rooms, men and women's locker rooms and showers, separate jacuzzi and massage rooms, beauty and skin care, acupuncture room, rest areas, and other spa-related uses.

The 2nd floor of the hotel would be developed with 38 hotel rooms and the 3rd floor would be developed with 28 hotel rooms and back-of-house space. The unique octagonal, round, and rectangular spaces on the 3rd floor, which remain from the original Galleria Building, would be converted to two hotel suites. The 4th and 5th floors would be developed with 40 hotel rooms each. Hotel rooms would range in size from an approximate minimum floor area of 318 square feet to a maximum floor area of approximately 1,790 square feet for the hotel's largest 3rd-floor suite. Interior hotel rooms would be oriented toward an oval light well cut into the center of the Galleria Building. The light well, which would be landscaped, would lead from the 2nd floor and be open to the sky.



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Feet

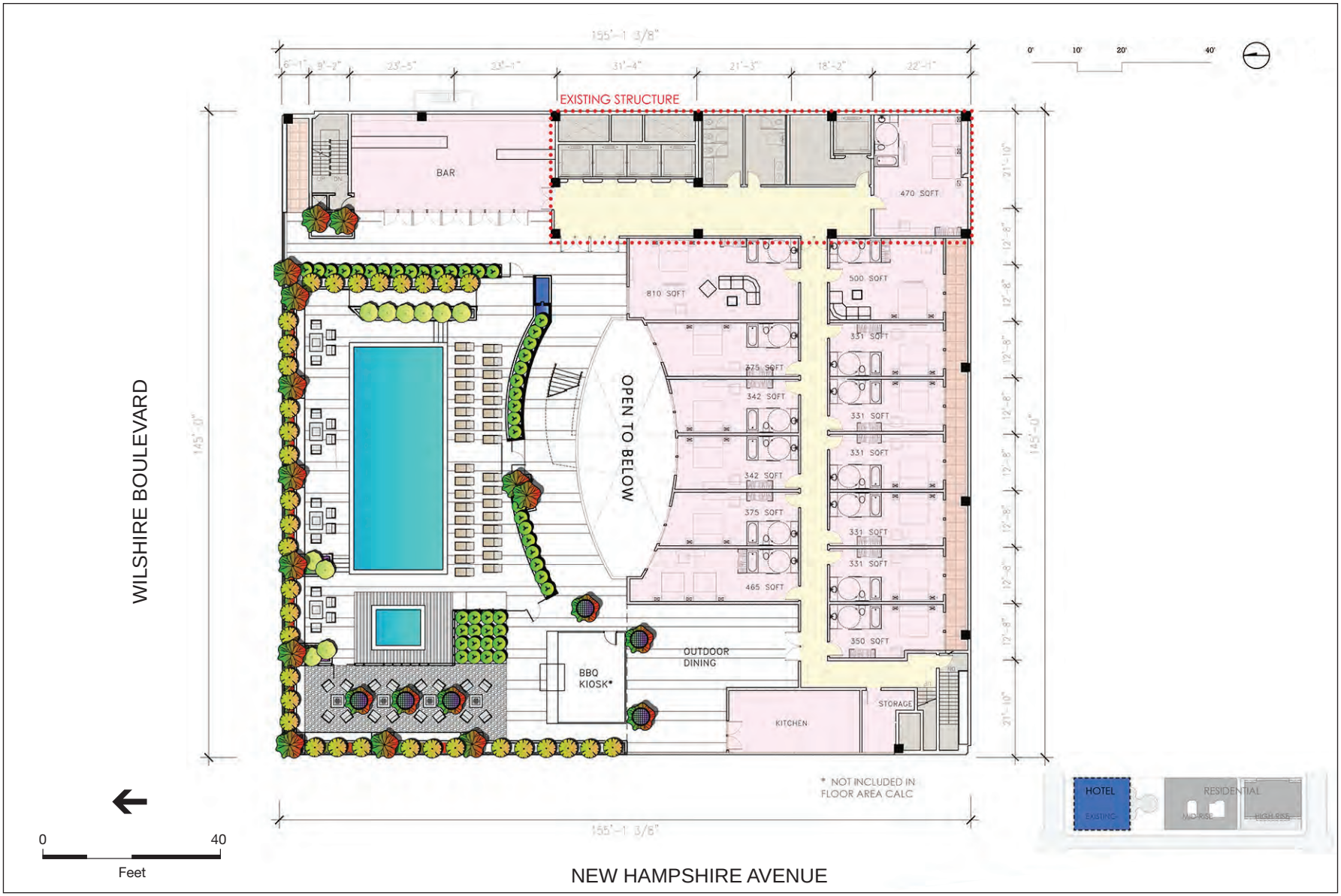
SOURCE: Archeon Group, 2016

698 New Hampshire

Figure A-5

Ground Floor Plan

ESA PCR



SOURCE: Archeon Group, 2016

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Figure A-6
Hotel Rooftop Plan

ESA PCR

The primary physical changes in the Galleria Building would be the development of the rooftop. As shown in **Figure A-6**, *Hotel Rooftop Plan*, a new, 6th story would be added to the Galleria Building and developed with 14 hotel rooms, a pool deck, a barbeque kiosk, outdoor dining, and a lounge. An additional recreation/observation deck, directly above the new units section and rising above the pool deck, would be developed with another lounge and table seating. The 6th floor deck along the roof edges and upper recreational deck would be substantially landscaped. The new 6th story and recreational /observation deck would be set back from the hotel's front wall (Wilshire Boulevard) and a two-foot planter wall would frame the existing roofline, as viewed from adjacent streets. A glass guardrail along the edge of the roof would provide safety and would reduce the contrast between the new addition and the original Galleria Building exteriors. Hotel rooms on the 6th floor would be located at the rear of the Galleria Building (the south part of the roof). **Table A-1**, *Proposed New Development Summary*, shows the total proposed floor area for the hotel development, as well as the other Project components (discussed below).

Approximately 160 parking spaces for hotel use would be provided in the new parking facilities below the mid-rise mixed use buildings, as discussed below.

2. Mixed-Use Residential/Commercial Buildings

Mid-Rise Building

A new 7-story, approximately 80-foot tall mixed-use building would be constructed to the south of the *porte cochere*. This building would have a two-level concrete podium with a lobby, 190 units, approximately 2,270 square feet of commercial floor area at the ground level along the New Hampshire Avenue frontages, and bicycle and automobile parking on the ground floor and 2nd level. The 3rd to 7th floors would be devoted to residential units. As shown in Table A-1, the units would consist of Studio A and Studio B, and 1-Bedroom-A, 1-Bedroom-B, 1-Bedroom-C, and 1-Bedroom-D unit types. Unit sizes would range from Studio-A, which would have approximately 438 square feet of floor area, to 1-Bedroom D, which would have approximately 690 square feet of floor area. The total floor area for this building would be approximately 117,429 square feet.

Two courtyards comprising approximately 3,464 square feet on the 3rd floor would serve as common open space areas for residents along with an approximate 8,265-square-foot roof-top deck with swimming pool. The courtyards would be landscaped and provide for light into interior units. A third enclosed amenity room comprising approximately 2,572 square feet would be located on the 2nd floor. Private open space requirements would be met with approximately 1,750 square feet of balconies. Total open space and common/private amenities would comprise approximately 16,051 square feet.

Pedestrian access to the residential component would be directly from the sidewalk to the ground floor lobby on New Hampshire Avenue. Access to the ground-level retail uses would also be directly from the sidewalk. Short-term bicycle parking would be accessed from New Hampshire Avenue, adjacent to the retail use.

TABLE A-1
PROPOSED DEVELOPMENT SUMMARY[a]

Use	Units	Floor Area
Hotel (I. Magnin Building)		
Hotel Guest Rooms	160 Rooms	87,804 SF
Restaurant /Bar		13,364 SF
Spa		14,335 SF
Kitchen		2,047 SF
Hotel Lobby		3,094 SF
Back of House and Other		8,218 SF
Total Hotel Floor Area		128,862 SF
Mid-Rise Building (7 Stories)		
Studio A (~438 SF)	115 Units	50,382 SF
Studio B (~456 SF)	30 Units	13,376 SF
1 BR-A (~637 SF)	5 Units	3,185 SF
1 BR-B (~654 SF)	30 Units	19,631 SF
1 BR-C (~690 SF)	5 Units	3,448 SF
1 BR-D (~690 SF))	5 Units	3,448 SF
Total Mid-Rise Residential Units	**190 Units**	
Commercial Floor Area		2,270 SF
Total Mid-Rise Floor Area		117,429 SF
High-Rise Building (35 Stories)		
Studio (~583 SF)	51 Units	29,721 SF
I BR (~621 SF)	100 Units	62,092 SF
1 BR + Den-A (~760 SF)	50 Units	37,985 SF
1 BR + Den-B (~828 SF)	52 Units	43,053 SF
2 BR Units (~1,331 SF)	102 Units	135,719 SF
Total High-Rise Residential Units	**355 Units**	
Commercial Floor Area		2,832 SF
Total High-Rise Floor Area		371,911 SF
Total Mid-Rise and High-Rise Retail Floor Area		5,102 SF
Total Combined Residences	**545 Residential Units[b]**	
Total Mid-Rise, High-Rise & Hotel Floor Area		618,202 SF
Total Parking Provided	720 spaces	

[a] *SF represents amount of floor area (FA) as calculated for purposes of determining floor area per Los Angeles Municipal Code (LAMC) requirements. Square footage numbers in table represent approximate amounts for planning purposes.*

[b] *Includes 54 Very Low Income Units*

SOURCE: Archeon Group, 2016

Two levels of underground parking would be located beneath the podium. All of the required parking for the residential units and the hotel would be located in the parking garage below this building. The hotel parking would be located in the two subterranean parking levels, with the residential parking located in the subterranean levels and in the above- ground parking podium. Pedestrian access from the parking structure to the hotel would be through the hotel's motor court. Vehicular access to the building would be via one existing and one new driveway on New Hampshire Avenue and access from the alley on the east side of the Project Site.

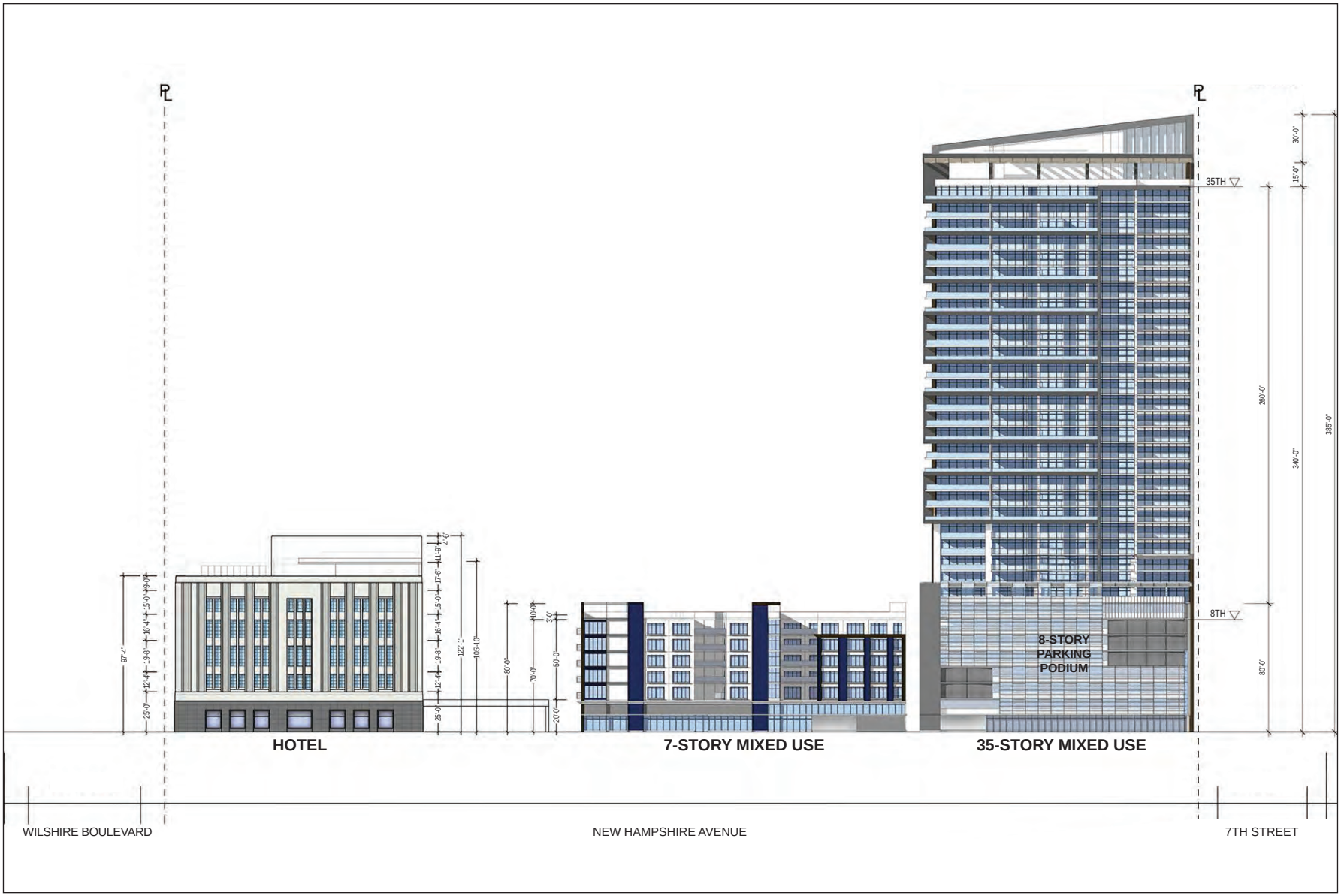
High-Rise Building

A new 35-story, approximately 395 foot tall, high-rise mixed-use building would be constructed in the south portion of the Project Site. This building would sit atop two subterranean parking levels, which would be connected to the two parking levels below the new 7-story mid-rise building. The building would include an above-ground, 8-story concrete parking podium with a lobby, leasing office, and approximately 2,832 square feet of commercial floor area on the ground level. Parking would be provided on the 2nd-8th levels. All of the required parking for this building would be contained within the 10 total parking levels within and below the building. The 9th-34th floors would be devoted to apartment units. The 35th floor (rooftop) would feature a roof deck with a pool and two large amenity rooms. The rooftop would feature a prominent architectural feature to add visual interest for residents and a unique feature of the building as viewed from a greater distance. The rooftop would also provide space for mechanical equipment.

The 9th floor would include a roof deck as well as enclosed amenity spaces. The 9th and 35th floor decks would total approximately 15,420 square feet. The enclosed amenity spaces on the 9th and 35th floors would total approximately 12,867 square feet. Balconies within the high-rise building would provide approximately 15,200 square feet of additional private open space.

Pedestrian access to the residential component would be directly from the sidewalk to the ground floor lobby on New Hampshire Avenue. Access to the ground-level retail uses would also be directly from the sidewalk, and a prominent retail entrance would face the corner of 7th Street and New Hampshire Avenue. Short-term bicycle parking would be provided in two locations along 7th Street. Vehicle access to the building would be via a driveway on 7th Street and a new driveway on New Hampshire Avenue. There would be no access from the alley to the high-rise building. A loading dock to serve the mid- and high-rise buildings would be provided within the ground level parking area of the high-rise building with access from New Hampshire Avenue. Operating hours for the loading dock would be 24 hours per day, seven days per week.

The ground floor plan for the two mixed-use buildings is provided in Figure A-5, above**.** **Figure A-7**, *West Elevation,* illustrates the building heights and the relationship of the residential buildings to the hotel.



SOURCE: Archeon Group, 2016

698 New Hampshire

Figure A-7
West Elevation

ESA PCR

Density of Residential Development

Because the Applicant is setting aside 11 percent (54 units) for very low-income households, the Project is entitled to two "On-menu" incentives pursuant to LAMC Section 12.22.A.25 (c). The first incentive permits the Project to exceed the current height district's floor area ratio (FAR) of 6.0:1. Based on a buildable area of 90,455 square feet, the Project would result in a maximum FAR of 6.83:1. The second incentive allows for (1) floor area averaging across the entire Site, (2) density averaging across the entire Site, and (3) vehicular access to cross from a less restrictive zone (C4) to a more restrictive zone (R5). Because 11 percent of total units would be reserved for very low-income residents, a bonus of 35 percent of the 483 base units, or 653 total units would be allowed. The Applicant, however, is seeking a bonus of only 13 percent, for a total of 545 residential units.

3. Parking

As shown in **Table A-2**, *Summary of Required and Provided Vehicle and Bicycle Parking*, the LAMC would require 647 vehicle spaces for the Project's residential component consisting of 196 studio units, 145 one-bedroom units, and 204 two-bedroom or one-bedroom-with-den units. The hotel, spa, restaurant, and retail uses would require 149 vehicle spaces for a total vehicle parking requirement of 796 spaces. The LAMC also requires 25 short-term and 25 long-term bicycle parking spaces for the hotel, restaurant, spa, and retail uses, and 54 short-term and 545 long-term bicycle parking spaces for the residential uses. The Project would provide a total of 79 short-term and 570 long-term bicycle spaces.

The LAMC allows for a reduction in parking of one vehicle space for four bicycle parking spaces up to 30 percent of the commercial vehicle parking and up to 15 percent of the residential parking within 1,500 feet of a transit portal, such as the Wilshire/Vermont Metro station. With the provision of bicycle parking and implementation of a transit corridor credit, the total vehicle parking requirement would be reduced to 686 spaces.

The Project's vehicle and bicycle parking would meet the requirements of the LAMC, including 160 parking spaces for the hotel uses. As discussed above, two levels of underground parking and two levels of parking in the above-ground podium would be located in the mid-rise building to provide parking for the hotel uses, the 190 dwelling units in the mid-rise building, and 2,270 square feet of commercial space in the mid-rise building. Parking for the high-rise building would be provided in the two subterranean parking levels (connected to the mid-rise building subterranean levels) and its eight above-grade (podium) parking levels.

As part of the Project, a Transportation Demand Management Program (TDM) would be developed that would include programs intended to reduce vehicle miles traveled. The TDM program may include discounted employee and resident transit passes, a transportation information center, and participation in a flex- car program on-site.

TABLE A-2
SUMMARY OF REQUIRED AND PROVIDED VEHICLE AND BICYCLE PARKING

Use	Code-Required Vehicle Parking (Sec. 12.21.A4, Sec. 12.21.A.25 and 12.22.A.25(d))	Code-Required Bicycle Parking[a] (Sec. 12.21.A16(a)(2)	Transit Corridor Credit[b]	Total Required Parking	Parking Provided
Hotel (160 rooms)[c]	78	8 ST, 8 LT	4	74	
Spa (14,335 square feet)[d]	29	7 ST, 7 LT	3	26	
Restaurants (15,411 square feet)[d]	30	8 ST, 8 LT	4	26	
Residential [e]					
Studio (196 Units)	196				
1 Bedroom (145 Units)	145				
2 Bedroom or 1 Bedroom with Den (204 Units)	204				
Total Residential (545 Units)	647	54 ST, 545 LT	98	549	
Retail (5,102 square feet)[d]	11	2 ST, 2 LT	0	11	
TOTAL	**796**	**79 ST, 570 LT**	**109**	**686**	**717**

[a] 1 short-term (ST) and 1 long term (LT) space per 20 hotel rooms; 1 ST and one LT space per 2,000 sf of commercial floor are; and 1 ST space per 10 units and 1 LT space per 1 residential unit.
[b] Transit-corridor parking credit is 15 percent of required residential/hotel parking and 30 percent of commercial parking.
[c] Code-required hotel parking is one space per room for the first 30 rooms, 1 space per 2 rooms for the next 30 rooms, and 1 space per room for the remaining rooms.
[d] Code-required commercial parking is 2 spaces per 1,000 square feet.
[e] Code-required residential parking is one space per studio and one-bedroom unit, and 2 spaces per two bedroom unit for a density bonus project.

SOURCE: Archeon Group, Development Plans for 3240 Wilshire, Los Angeles, 2016.

4. Transit Access

The Project Site is located 275 feet from the Wilshire/Vermont Metro Station (subway-rail) for the Red and Purple Lines (located at the northeast corner of Wilshire Boulevard and Vermont Avenue). These lines provide access to the other transit lines operated by Metro. It is anticipated that the proximity of the Project to this station would encourage the use of transit by on-site permanent residents and their guests, hotel guests, retail and restaurant patrons, and employees. The Project Site is also served by Metro Bus Lines 20, 204, 720 754, and Foothill Transit lines 481. In the future, the Purple Line would be extended farther west along Wilshire Boulevard to provide convenient access to more destinations to the west.

5. Pedestrian Features, Amenities and Landscape Design

At the street level, the Project would be pedestrian active, utilizing the New Hampshire Avenue and 7th Street sidewalks for both residential and retail building access (with limited vehicular access) while maintaining the sidewalks and parkways along Wilshire Boulevard for the exclusive uses of pedestrian traffic and potential sidewalk seating. The Project further embraces

the pedestrian activity on Wilshire Boulevard by offering retail and restaurant opportunities at the ground level of the hotel.

The Project would provide residential open space in excess of code requirements. As shown in **Table A-3**, *Mid-Rise and High-Rise Open Space/Amenities*, according to the number of units and the mix of unit types, 59,600 square feet of open space is required, and a total of approximately 61,425 square feet of open space would be provided in amenities and private balconies as part of the Project. As shown in the table, an approximate 1,887 square foot pet park would be provided by the Project. The pet park for residents would be located on street grade in the area between the mid-rise and high-rise buildings.

TABLE A-3
MID-RISE AND HIGH-RISE OPEN SPACE/AMENITIES[A]

Required Open Space/Amenities			**Provided Open Space/ Amenities**		
Unit Type	No. of Units	Required Open Space/ Amenities	Amenity	Mid-Rise	High-Rise
Studio[b]	196	19,600 SF	Enclosed Amenities	2,572 SF	12,867 SF
1 BR[b]	145	14,500 SF	Common Open Space	3,464 SF (court yard)	15,420 (SF roof deck)
				8,265 SF (roof deck)	
				1,887 SF (pet park)	
1 BR+Den[c]	102	12,750 SF	Private Open Space	1,750 SF (balconies)	15,200 SF (balconies)
2 BR[c]	102	12,750 SF			
Total Required:		59,600 SF	Total Provided:		61,425 SF

[a] *Square footage numbers in table represent approximate amounts for planning purposes.*
[b] *100 SF. open space/amenities per unit*
[c] *125 SF open space/amenities per unit*

SOURCE: Archeon Group, 2016.

The intention of the landscape design is to create a pedestrian-friendly environment which includes shade trees and landscape along the street. A landscaped plaza between the hotel and mid-rise building would enhance the motor court and valet drop-off area for the hotel.

The two mixed-use buildings would include landscaped courtyards on the podium level of each building to provide common open space for residents. These social and community spaces would include gardens, group gatherings areas, outdoor viewing terraces, barbeque and outdoor dining areas, recreation places for fitness and yoga, as well as quiet and intimate spaces. The rooftop of the Galleria Building would also be improved with a swimming pool and landscape features in the upper garden terraces area. A rooftop amenities deck on the mid-rise building would include landscaped areas for passive recreation. The landscaping would include drought-tolerant plants

using both native and adaptive native plant materials. The design would incorporate an efficient irrigation system that meets California SB 1881.[1]

6. Sustainability

The Project would achieve several objectives of the City of Los Angeles General Plan Framework Element, Southern California Association of Governments Regional Transportation Plan, and South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) for establishing a regional land use pattern that promotes sustainability. The Project would support pedestrian activity in the area, and contribute to a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses within an area that has public transit (with access to existing regional bus service and the Metro Station), and employment opportunities, restaurants and entertainment all within walking distance.

The Project would be designed to meet the California Green Building Standards (CALGreen) Code as adopted and amended by the City of Los Angeles through the incorporation of green building techniques and other sustainability features, including those within the City of Los Angeles Green Building Code, where applicable. Some of the project's key design features that would contribute to energy efficiencies include the use of glass/window areas for ventilation and daylight accessibility, use of recyclable materials for flooring and demisable partitions in limited amounts, green walls in some areas, low albedo (high reflectivity) color paving to reduce heat island effect, solar panels installed on roof deck areas, and landscaping of courtyards and roof decks. Other building features would include such items as installation of energy-efficient lighting, heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); use of high efficiency fixtures and appliances; water conservation features; and dedicated on-site recycling area. The Project's inclusion of bicycle parking, as discussed above, would encourage the use of alternative modes of transportation.

The Project would reduce outdoor potable water use by a minimum of 20 percent compared to baseline water consumption. Reductions would be achieved through drought-tolerant/California native plant species selection and artificial turf, landscape contouring to minimize precipitation runoff, irrigation system efficiency, alternative water supplies (e.g., stormwater retention for use in landscaping), smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.

In addition, to encourage carpooling and the use of electric vehicles by project residents and visitors, the Project would designate a minimum of eight (8) percent on-site parking for

[1] California SB 1881 (2015) updates the Water Conservation Act of 2009 or State Model Water Efficient Landscape Ordinance to increase water efficiency standards for new landscapes, including on-site stormwater capture and limiting turf.

carpool and/or alternative-fueled vehicles and shall pre-wire, or install conduit and panel capacity for, electric vehicle charging stations for a minimum of five (5) percent of on-site parking spaces.

7. Lighting and Signage

New Site signage would be used for building identification, hotel and commercial/restaurant tenant advertising/branding, wayfinding, and security markings. It would be designed and located to be compatible with the architecture and landscaping of the Project. Hotel and commercial/restaurant signage would be similar to other signage along the street frontages in the area. Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture. Any pole-mounted light fixtures located on-site would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive land uses, such as existing residential uses to the south of the Site. No off-site signage is proposed. All lighting and signage would be developed in compliance with applicable LAMC requirements.

8. Security Features

The Project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project would be designed in consideration of the City's "Design Out Crime" initiative to provide a project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED). Design strategies within the project design would include, but not limited to, the following:

- Secure access points would be limited and located in areas of high visibilities;
- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used; and
- Interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the project:

- Installing and utilizing a 24-hour security camera network throughout the underground and above-grade parking structure; the elevators; the common and amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces.
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed.
- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user.

- Training employees on sound security policies for the project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and monitoring the property.

- Access to commercial uses would be unrestricted during business hours, with public access discounted after businesses have closed.

9. Anticipated Construction Schedule and Activities

Construction could commence in early to mid 2017, with construction activities occurring for approximately 31 months into late 2019 or early 2020. Full build-out and occupancy is anticipated to occur in 2020.

F. Necessary Approvals

It is anticipated that approvals required for the Project would include, but may not be limited to, the following:

1. Site Plan Review (Sec. 16.05)

2. Density Bonus Conformance Review for an approximately 13 percent density bonus (up to 35 percent allowed) with the provision of 11 percent very-low income housing units with on-menu incentives for increased FAR and density/FAR averaging (Sec. 12.22 A.25)

3. Conditional Use Permit for on-site sales and consumption of alcoholic beverages at a hotel, two restaurant/lounges within the hotel, and a restaurant in the high-rise mixed-use building. (Sec. 12.24 W.1)

4. Vesting Conditional Use Permit for a mixed use development in an R5 zone in a redevelopment area (Sec. 12.24 W.15 & 12.24 T)

5. Vesting Conditional Use Permit for hotel within 500 feet of a residential zone (Sec. 12.24 W.24 & 12.24 T)

6. Vesting Tentative Tract Map No. 74117 for a two lot subdivision with 545 condominium units with a request for haul route approval and to designate New Hampshire Avenue as front yard for each lot (Sec. 17.01).

7. Construction permits, including building, grading, excavation, foundation, and associated permits.

8. Haul Route Permit, as may be required.

9. Other approvals as needed.

Attachment B

Explanation of Checklist Determinations

ATTACHMENT B
Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. Where applicable, project design features (PDFs) and/or mitigation measures are identified in the analysis of environmental issues.

1. Aesthetics

Senate Bill (SB) 743, enacted in 2013, changes the way in which environmental impacts related to transportation and aesthetics are addressed in an EIR. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant unavoidable impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and

2. The project is located on an infill site within a transit priority area.

Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2451 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within transit priority area (TPA) pursuant to CEQA. A TPA is an area located within one-half mile of a major transit station. Because of the mixed-use residential character of the project and its location within an urban transit priority area, the Project's aesthetic impacts shall not be considered significant. Nonetheless, the Project is herein compared to the respective CEQA thresholds for disclosure/informational purposes only.

Would the project:

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area, with a mix of commercial and multi-family buildings in the immediate vicinity. The topography surrounding the Project Site is flat with views of the Hollywood Hills through north-facing street corridors, such as Vermont and New Hampshire Avenues. Existing views across the Project Site from public streets to the east and west (New Hampshire and Vermont Avenues) are blocked by the existing 18- and 16-story Wilshire Towers and views across the Project Site from Wilshire Boulevard and 7th Street are blocked by the Galleria Building. As such, no broad views or scenic views from public streets are currently available across the Project Site.

In addition to streets, public parks in the area, including the Robert F. Kennedy Inspiration Park, approximately 0.22 miles to the west along Wilshire Boulevard; the Lafayette Recreation Center, approximately 0.42 mile to the east along Wilshire Boulevard; Shatto Recreation Center, on 4th Street approximately 0.42 mile to the northeast; and MacArthur Park, approximately 0.73 mile to the east/southeast along Wilshire Boulevard, have views of the hills and surrounding cityscape.

Primary views in the area are those of notable buildings along, or in the vicinity of, Wilshire Boulevard, such as the Immanuel Presbyterian Church, approximately one block to the west of the Project Site; Bullocks Wilshire's approximately 242-foot-high art deco tower, 0.26-mile to the east of the Project Site; the approximately 448-foot-high, 35-story Equitable Tower, 0.3 mile to the west of the Project Site; the approximately 247-foot- high, 19-story 600 Commonwealth building at 6th Avenue and Commonwealth, 0.42 mile to the west of the Project Site; and the cluster of high-rise buildings ranging from 18 to 29 stories in the Project vicinity.

Robert F. Kennedy Inspiration Park, located within the former Ambassador Hotel property, has east-facing views along Wilshire Boulevard, including views of the historic Immanuel Presbyterian Church steeple and the 23-story 3250 Wilshire Building. However, views of the Project Site are obscured by the 12-story 3270 Wilshire Building, located adjacent to the Robert F. Kennedy Community Schools campus. Because of the proximity of the 3270 Wilshire Building to the Robert F. Kennedy Inspiration Park, no public views of the Project's proposed mixed-use buildings would be available from this area. The Lafayette Recreation Center, has west facing public views through the Wilshire Boulevard corridor of the Bullocks Wilshire art deco tower, the 23- and 29-story The Vermont towers, and other high rise buildings in the vicinity of the Project Site. The park adjoins and has immediate views of the 600 Commonwealth building. Because west-facing views through Wilshire Boulevard are available from the Lafayette Recreation Center, the Project's 35-story high-rise building would be within the line of sight from this area. However, the high-rise building would be in the backdrop of other high-rise buildings, such as The Vermont towers and the Towers at Wilshire. Because the Project's high-rise building would be a component of the background beyond The Vermont towers and other high-rises, it would not block scenic views as seen from the Lafayette Recreation Center.

Because of the area's generally flat terrain and intervening buildings, no views of the Project Site or vicinity are available from Shatto Park. In addition, because of the flat terrain and distance from MacArthur Park, no views of the Project are available from MacArthur Park.

Overall, no broad views are currently available across the Project Site and, as such, the Project would not have a substantial adverse effect on a scenic vista. The Project would have a less than significant impact with respect to scenic vistas. Further, per SB 743/PRC 21099 and City of Los Angeles ZI No. 2451, the aesthetic impacts are considered less than significant.

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?

Less Than Significant Impact. The Project Site is currently improved with the Galleria Building, a City of Los Angeles-designated Historic-Cultural Monument. The Project Site also contains a 155-space paved surface parking lot. The Project Site is not located in the vicinity of a City or State-designated scenic highway. The Project Site does not contain any unique natural features such as rock outcroppings and trees. Because the Galleria Building in the north section of the Project Site is considered historically important, the introduction of new development adjacent to the building and the additional development on the roof of the Galleria Building have the potential to substantially affect the architectural and historical context of the building.

During the transition from the former I. Magnin Department Store to the existing Wilshire Galleria, the building's white marble and polished black granite exterior claddings were kept intact. The Galleria Building currently maintains a strong sidewalk presence with attractive surface materials and large display windows along both Wilshire Boulevard and New Hampshire Avenue. However, in recent years, the display windows and entrance alcove have been used primarily for signage (including neon displays) that generally block visibility into the first floor from the sidewalk.

Under the Project, the Galleria Building's original marble and granite facades and display windows would be maintained. Display windows would be cleared to allow views into the interior from the sidewalk and the front entrance on Wilshire Boulevard would be re-emphasized. The central atrium would be restored. New rooftop structures would be set back from the Wilshire Boulevard and New Hampshire frontages, so that the rooftop addition would not create a flat plane with the existing exterior walls or contiguous incompatible cladding materials. In addition, the setbacks would reduce the visibility of the new addition from adjacent streets. As discussed in Section 5, Cultural Resources, of this MND, while the Project would result in some exterior alterations to the Galleria Building, such alterations would not result in significant historic impacts or compromise the historical designation eligibility/status of the Galleria Building.

The development of the Project's mid- and high-rise buildings also has the potential to affect the historical context of the Site by juxtaposing buildings of greater mass and density to the Galleria Building. However, the existing setting encompasses numerous mid- and high-rise buildings, including a 16-story building immediately to the east and the 23-story 3250 Wilshire building directly across New Hampshire Avenue to the west. The Project's 7-story mixed-use building would be located to the south of the *porte cochere* and, thus, create a setback of approximately 320 feet between the Galleria Building and the Project's 35-story high-rise building. Because of this deep setback and the existing high-rise character of the area, the development of higher intensity uses on the Project Site would not adversely impact the historical context of the Galleria Building.

Through the setbacks of the new rooftop addition from the street edges of the building, improving the sidewalk frontage to allow better pedestrian access and visibility into the building and restoring the central atrium, and creating a broad setback between the historical Galleria Building and the new high-rise building, the Project would the reduce visual effects of the restoration/addition on this locally important historical resource. Consistent with SB 743/PRC 21099 and City of Los Angeles ZI No. 2451, impacts with respect to existing aesthetic resources would be less than significant.

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

Less Than Significant Impact. The Project Site is currently occupied by the Galleria Building, a surface parking lot, and landscaping in the area around the existing *porte cochere* on New Hampshire Avenue, as well as street trees along the adjacent roadways. Mature ficus trees ranging from good to poor condition create the streetscape along New Hampshire Avenue and younger ficus trees are located on 7th Street. Three camphor trees are located along Wilshire Boulevard. The Project's proposed 7-story and 35-story mixed-use buildings, which would be constructed in the existing surface parking area would change the character of the existing Project Site with the surface parking lot changed into a dense urban lot similar in character to the adjacent and nearby high-rise environment. Potentially, some of the existing street trees are anticipated to be replaced along New Hampshire and 7th Street and the *porte cochere* landscaping would be replanted. **Figure A-4**, *Simulated Aerial View of the Project*, in Attachment A and **Figure B-1**, *Simulated View of the Project's Mixed-Use Buildings from New Hampshire Avenue South of 7th Street*; and **Figure B-2**, *Simulated View of the Project's Mixed-Use Buildings from New Hampshire Avenue at Wilshire Boulevard*, illustrate the new buildings from various vantages around the Project Site.

With the context of the general urban setting, the Project's 35-story high-rise building would be highly visible from the surrounding area and consistent with The Vermont's 23- and 29-story towers, the adjacent 16- and 18-story towers to the east, the 23-story 3250 Wilshire Building across New Hampshire Avenue from the Galleria Building, and the 34-story, approximately 440-foot-high Equitable Plaza building to the west, would add to the concentration of high-rise buildings in the Wilshire Boulevard/Vermont Avenue vicinity. Because of the concentration of existing high-rise buildings within the Project area, the Project's high-rise building would not be isolated or incompatible with existing development. Therefore, because the Project's high-rise building would be in keeping with the character several nearby and adjacent high-rise buildings, the Project's high-rise buildings would not substantially degrade the existing visual quality of the area.

SOURCE: Archeon Group, 2016

698 New Hampshire

Figure B-1
Simulated View of the Project's Mixed-Use Buildings
from New Hampshire Avenue South of 7th Street

ESA PCR

SOURCE: Archeon Group, 2016

698 New Hampshire

Figure B-2
Simulated View of the Project's Mixed-Use Buildings
from New Hampshire Avenue at Wilshire Boulevard

ESA PCR

The Project's mixed-use buildings would also have a distinctive architectural style that would add to the existing visual character of the adjacent street fronts. The Project would enhance the street edge along Wilshire Boulevard through upgrades to the Galleria Building. Display windows would be cleared of signage, which would allow views into the building from the street edge, as recommended under the City's Walkability Checklist and Citywide Design Guidelines. In addition, new signs would be subject to the requirements of the Los Angeles Municipal Code (LAMC), which regulates signage and prohibits multiple temporary signs in store windows and along building walls. The Hotel lobby and restaurants would be directly accessible from the main entrance on Wilshire Boulevard and from an additional door into the Project's proposed restaurant space near the corner of Wilshire Boulevard and New Hampshire Avenue. Dining would be provided along the Wilshire Boulevard sidewalk. The existing design character of the street edge, including polished black granite along the street front, would be maintained. The proposed rooftop addition would be set back from Wilshire Boulevard and New Hampshire Street near Wilshire Boulevard, which would reduce the visual contrast of the addition from the existing building front, as viewed from the street. As such, the visual character of the existing building would not be substantially degraded.

The existing visual character of the street front, as viewed from New Hampshire Avenue, would be changed by the conversion of the existing surface parking lot into mid- and high-rise buildings. Under existing conditions, the parking lot provides a partial open space aspect to the Project Site, but does not offer visual amenities, such as landscaping or other features of visual interest. The mid- and high-rise buildings would be set at the sidewalk edge, which would create a more urban aspect to the street front. Commercial uses would be provided mid-block on New Hampshire Avenue at the mid-rise building, and on New Hampshire Avenue near 7th Street at the high-rise building. These uses would be located at the street edge and would be directly accessible from the sidewalk. The Project's residents would also have direct access to New Hampshire Avenue. The new commercial uses and introduction of new residents would enliven the street front and enhance pedestrian activity, which would bring a livelier aesthetic character to New Hampshire Avenue between 7th Street and Wilshire Boulevard.

New landscaping and pavement treatments would be provided in the new motor court/*porte cochere* area, which would be highly visible from New Hampshire Avenue. The Site's street frontages are currently planted with street trees. These include three camphor trees on Wilshire Boulevard, eleven mature *ficus rubiginosa* trees along New Hampshire Avenue, and two *ficus nitida* trees along 7th Street. Potentially, some of the street trees along New Hampshire and 7th Street would be removed under the Project. The species type and location of any replacement trees along New Hampshire Avenue or 7th Street frontages would be subject to the requirements of the City's Bureau of Street Services, Forestry Division standards. The installation of any new street trees would provide a unified, positive appearance of the street edge.

Although high-rise buildings exemplify the character of Wilshire Boulevard, 7th Street is more characterized by a range of newer and older architectural styles and uses. The Project would be consistent with the high-rise aspect of the adjacent 18-story office building to the east, but would contrast with the basic low- and mid-rise character of 7th Street with the introduction of a 35-story

building. With the exception of the existing 18-story office building, 7th Street is characterized by lower and mid-rise multi-family uses and, as the corner of Vermont Avenue and New Hampshire Avenue, an older mini-mall with a free-standing billboard at the south side of the street. An older two-story apartment building is located directly south of the Project Site, a new 7-story apartment building is located directly west of the Project Site, the 2-story Child Study Center/ Children's Institute is located on the south side of the 7th Street across from the Project Site. Between New Hampshire Avenue and the 24-acre Robert F. Kennedy Community Schools campus, two blocks to the west of the Project Site, newer and older multi-family dwellings line both sides of 7th Street, the 1924 historic Hotel Chancellor is located at the north side of the street and the 1927 historic, Tudor-style Windsor Hotel is located at the south side of the street. In this area, 7th Street terminates at the 24-acre Robert F. Kennedy Community Schools campus, two blocks to the west of the Project Site. The Kennedy Community School is constructed on the former Ambassador Hotel site and includes a 7-story building with a replica of the Ambassador Hotel's Cocoanut Grove and a memorial pocket park on Wilshire Boulevard (Robert F. Kennedy Inspirational Park). As evident in the range of uses, the character of 7th Street between Vermont Avenue and the Robert F. Kennedy Community Schools campus is eclectic with a diverse architectural character and an active pedestrian environment.

Although the Project would potentially contrast with the predominantly low- and mid-rise character of 7th Street, the Project would contribute to the visual quality of the Project Site as viewed from 7th Street by replacing a surface parking lot with new development and enhancing the street front at the corner of 7th Street and New Hampshire Avenue with commercial uses directly accessible from the sidewalk. Street-level commercial uses would occupy approximately half of the Site's 7th Street frontage. This would further encourage pedestrian activity and movement between the existing residential neighborhoods along 7th Street and commercial uses on Wilshire Boulevard and Vermont Avenue. These changes would add visual interest and street front activity and, thus, contribute to the aesthetic character of the Project Site as viewed from 7th Street. Due to the historically compatible alterations proposed for the Galleria Building, the low level of existing visual quality associated with the surface parking lot that occupies the majority of the Project Site, and the upgrading of the street frontages with new street-orientated entrances, removal of signage from the existing display windows, and new landscaping, the Project would not substantially degrade the visual character and quality of the Project Site or surrounding area. Visual character impacts would, therefore, be less than significant consistent with SB 743/PRC 21099 and City of Los Angeles ZI No. 2451.

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

Light and Glare

Less Than Significant Impact. The Project Site is currently improved with the Galleria Building, which contains a spa, restaurants, retail and office uses. The remainder of the Project Site consists of a paved, 155-space surface parking lot. The Project Site is located in a highly urbanized area with a mix of light industrial, manufacturing, commercial, residential and public facility land uses, characterized by buildings of varying heights. Approximately a half-dozen

pole lights provide nighttime security for the parking lot. Other existing lighting sources include neon-lit advertising and displays in the windows of the Galleria Building.

The mix of land uses immediately occur in the immediate Project Site vicinity within a variety of structures from low-rise to high-rise buildings. The area is characterized by high activity and high ambient light levels from street front commercial uses and restaurants, street lights, billboards, illuminated signs, gas station lights at Wilshire and Vermont Avenue, and vehicle lights along adjacent roadways. Upper stories of most buildings in the area generally emanate a low level of light.

As with similar uses in the area, the Project's mix of uses would generate low to moderate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spillover off-site. Further, outdoor lighting would be designed and installed with shielding, such that the light source does not illuminate adjacent residential properties, the public right-of-way, nor from above (see PDF AES-1). The pole lights in the surface parking lot would be removed. All proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. The LAMC requires that plans for street lighting be submitted to and approved by the Bureau of Street Lighting for subdivision maps; that no sign be arranged and illuminated in a manner that produces a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property; and that no exterior light cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the Site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. In accordance with City requirements, the exterior of the proposed structure would be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat (see PDF AES-2). To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts are not expected to be substantial or to adversely affect day or night views. Therefore, consistent with SB 743/PRC 21099 and City of Los Angeles ZI No. 2451, glare impacts are considered less than significant.

Project Design Features

PDF AES-1 Outdoor lighting shall be designed and installed with shielding, such that the light source does not illuminate adjacent residential properties, the public right-of-way, nor from above.

PDF AES-2 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

Shade/Shadow

Less Than Significant Impact. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project area include the pool deck for the 7-story apartment building at 685 New Hampshire Avenue, directly to the west of the Project's 35-story tower and the pool deck for The Vermont complex to the northeast of the Project's 35-story tower. The 685 New Hampshire building is located approximately 118 feet to the west. The pool deck is at the east side of the building within a U-shaped area at the 2nd floor, which forms a cover over the building's New Hampshire Avenue entrance. Under existing conditions, the pool deck is shaded by the west and south wings of the building which are immediately adjacent and rise 6 stories above the pool. The Vermont complex's pool deck is located approximately 450 feet to the northwest of the Project's 35-story tower.

Shading of shade-sensitive uses to the south of the Project would be limited because the sun is always several degrees to the south and the greatest durations of shading occur to the north. No shade sensitive uses are located in the proximity of the Project to the north.

For purposes of this analysis, a Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.[1]

The tallest component of the Project is the proposed 35-story, approximately 385-foot-high mixed use building. Based on the City of Los Angles CEQA Thresholds Guide, shadow impacts consider shade sensitive uses to the north, northeast and northwest within a distance of three times the height of a proposed structure. Appendix A of this MND includes shade-shadow diagrams which illustrate the Project's shadows during the Winter Solstice, Summer Solstice, Fall Equinox and Spring Equinox. With the 685 New Hampshire Avenue building pool deck located directly to the west of the Project Site, shading would occur for less than three hours during the winter solstice and spring equinox so as not exceed the thee-hour threshold during these times of year. Also, shading would occur for less than four hours during the summer solstice and fall equinox so as not exceed the four-hour threshold during these times of year. With the Project's slender high-rise tower profile and the distance of The Vermont's pool deck (more than 400 feet) from the Project Site, the Project would not shade the pool deck of The Vermont complex to the

[1] Shadow impacts thresholds based on criteria set forth in the City of LA CEQA Thresholds Guide (2006).

northeast for more than approximately one hour during the winter solstice or fall equinox, which would be the worse-case shadow scenarios. Shading at The Vermont's pool deck would be well below the City's shadow thresholds. Therefore, the proposed buildings on the Project Site would not significantly increase the shading of nearby shadow-sensitive uses based on the significance thresholds stated above, and a less than significant impact would occur. Further, per SB 743/PRC 21099 and City of Los Angeles ZI No. 2451, the Project's aesthetic impacts are considered less than significant.

2. Agricultural and Forest Resources

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

Would the project:

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?

No Impact. The Project Site is located within a highly urbanized area and is currently developed with the Galleria Building and a surface parking lot. No agricultural uses, or related farmland operations are present within the Project Site or surrounding area. The Project Site is not is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP).[2] The urban character of the Project Site would be consistent with the FMMP's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur and no mitigation measures are required.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site is not zoned for agricultural uses

[2] State of California Department of Conservation, California Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, accessed June 2016.

and is not subject to a Williamson Act contract. Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur.

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

No Impact. The Project Site is currently developed with the Galleria Building and paved parking lot and is not zoned for forestry or timberland uses. The existing zoning of the Project Site is C4-2 and R5-2, which allow for commercial and high density residential uses. Thus, the Project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur and no mitigation measures would be required.

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

No Impact. Refer to Response No. 2.c, above.

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?

No Impact. The Project Site does not contain farmland, forest land, or timberland. Accordingly, the Project would not result in the conversion of farmland to non-agricultural uses or forest land to non- forest uses. Therefore, no impacts would occur and no mitigation measures would be required.

3. Air Quality

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Analysis based on the information provided in the project specific air quality and greenhouse gas technical study as well as the project specific traffic study. Would the project:

a. Conflict with or obstruct implementation of the South Coast Air Quality Management District Plan or Congestion Management Plan?

Less Than Significant Impact. The Project Site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

Project construction would result in an increase in short-term or temporary employment compared to existing conditions. Construction jobs under the Project would generally be small in number, temporary in nature, and filled by local construction workers already living in the South Coast Air Basin, and therefore, would not conflict with the long-term employment projections upon which the AQMP are based.

As discussed below under Section 13, Population and Housing, the location of the Project within a City-designated Transit Priority Area (TPA) (i.e., an area located within one-half mile of a major transit station) and within an area consistent with a SCAG-defined Transportation-Oriented District (TOD), is consistent with the growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks to improve mobility and access by placing destinations closer together connected by public transportation. The location of the Project also meets the criteria for a high quality transit area (HQTA), which is an area where people live in compact communities and have ready access to a multitude of safe and convenient transportation alternatives to driving alone, including walking and biking, taking the bus, light rail, commuter rail, the subway and/or shared mobility options. The Project would directly induce residential population growth by approximately 1,308 residents; however, it would also replace existing offices and restaurant/retail uses, thereby reducing total employees by approximately 104.

Control strategies in the AQMP, potentially applicable to control temporary emissions from construction activities, include ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards. In accordance with such strategies, the Project would use off-road heavy-duty equipment that meets or exceeds stringent U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB) Tier 3 or Tier 4 emissions standards. Additionally, the Project would comply with CARB requirements to minimize idling emissions from diesel-fueled vehicles. The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

The Project is located within a highly urban area with existing roads and services and would not indirectly increase population through new roads or other infrastructure. Project-related population and employment is within the SCAG 2012 RTP projections which forms the basis of the 2012 AQMP growth projections. According to the City, the Los Angeles area is experiencing a severe market-rate and affordable housing shortage and the Mayor has called for 100,000 new housing units by 2021.[3] The Project would make progress towards the City's goal and would provide market-rate and affordable housing units help to ameliorate the housing shortage in the City (approximately 11 percent of the Project's residential units would be designated as

[3] City of Los Angeles, Mayor's Office, "Garcetti says housing shortage, minimum wage linked in Los Angeles," October 30, 2014. Available: http://www.lamayor.org/garcetti-says-housing-shortage-minimum-wage-linked-los-angeles. Accessed July 22, 2016.

affordable housing). Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. In addition, the Project would be consistent with the applicable control strategies of the AQMP. Thus, construction and operation of the Project would have no significant impacts related to consistency with the AQMP.

The Congestion Management Program (CMP) was enacted by Metro to address traffic congestion issues that could impact quality of life and economic vitality. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips at any CMP intersection during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed. As discussed in Section 16, Transportation, the Project is not expected to exceed thresholds at any CMP intersection or freeway segments during any peak hour. As a result, the Project would not exceed any CMP thresholds, and no impact to CMP intersections would occur. Thus, the Project would not conflict with or obstruct implementation of the CMP.

Based on the above discussion of the applicable air quality plans, implementation of the Project would result in less than significant impacts.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project location. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Project Design Features

The Project would implement the following Project Design Feature to minimize criteria air pollutant emissions:

> **PDF AIR-1** Construction Measures: The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower (hp) to 89 hp and the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 90 hp or greater during Project construction. Equipment, such as air compressors, concrete/industrial saws, tower cranes, welders and pumps shall be electric or alternative fueled (i.e., non-diesel). To the extent possible, pole power will be made available for use with electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of

each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

PDF AIR-2 Fireplaces: The Project shall not include wood-burning or natural gas-fueled residential fireplaces.

Construction Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the Project Site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs, (2) 100 pounds per day for nitrogen oxides (NO_X), (3) 550 pounds per day for carbon monoxide (CO), (4) 150 pounds per day for sulfur oxides (SO_X), (5) 150 pounds per day for respirable particulate matter (PM10), and (6) 55 pounds per day for fine particulate matter (PM2.5).[4]

The Project would involve demolition of existing uses (i.e., surface parking lot) and construction of a mixed-use hotel, commercial, and residential uses, in addition to potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines). Construction activities would include demolition, excavation, utilities/trenching, building construction, architectural coatings and paving. Heavy-duty off-road equipment, such as excavators, loaders, cranes, and paving equipment would be used during construction. Approximately 12 to 13 haul trucks would be used per day during demolition. Site grading and excavation would result in approximately 48,000 cubic yards of soil export with approximately 132 haul trucks used per day during excavation.

Construction is anticipated to begin in early 2017. The expected duration of construction is approximately 31 months. The Project is anticipated to be fully operational in 2020. During construction, a variety of heavy-duty diesel powered equipment would be used on-site. Building construction and finishing activities will require equipment such as excavators, drill rigs, cranes, concrete pumps, and air compressors. Construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions

[4] South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed July 2016.

Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and greenhouse gas (GHG) impacts from land use projects throughout California.[5]

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2013.2.2) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. Model results are provided in Appendix B of this MND.

This analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions resulting from construction of the Project is presented in **Table B-1**, *Maximum Regional Construction Emissions*, along with the regional significance thresholds for each air pollutant.

TABLE B-1
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS [A]

Construction Activity	VOC	NO_X	CO	SO_X	PM10 [B]	PM2.5 [B]
Demolition	1	12	29	<1	1.6	0.5
Grading/Excavation	5	71	75	<1	6.3	2.4
Utilities/Trenching	<1	2	6	<1	0.2	0.1
Building Construction	2	16	37	<1	2.9	1.0
Building Construction/Paving/Architectural Coating	34	18	48	<1	3.4	1.1
Maximum Regional Emissions	**34**	**71**	**75**	**<1**	**6.3**	**2.4**
SCAQMD Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	(41)	(29)	(475)	(150)	(143.7)	(52.6)
Exceeds Threshold?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA PCR, 2016

5 See http://www.caleemod.com.

As shown in Table B-1, maximum regional emissions would not exceed the thresholds for VOC, NO_X, CO, SO_X, PM10, or PM2.5. Therefore, regional construction impacts would be less than significant, and mitigation measures would not be required.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_X, (5) 150 pounds per day for PM10, and (6) 55 pounds per day PM2.5.[6]

Regional air pollutant emissions associated with Project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., natural gas consumption) are classified by the SCAQMD as stationary source emissions while emissions associated with on-road vehicles are classified as mobile source emissions.

Operational emissions for the Project were estimated using CalEEMod for the existing land uses on the Project Site and for the land uses proposed by the Project to determine the net incremental change in emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing land uses and Project trips, trip generation rates provided in the Project traffic study were used.[7] The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. Reductions in VMT are calculated based on site-specific characteristics, such as increased job and housing density on the site and proximity to regional job centers, using the equations and methods prescribed in the California Air Pollution Control Officers Association guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures.[8]

With regard to energy usage, the consumption of natural gas to provide heating and hot water generates emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and Project land uses. Energy usage (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters) for

6 South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed July 2016.
7 Overland Traffic Consultants, Inc., Traffic Impact Analysis for Wilshire Mixed Use Project, June 2016.
8 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).

the Project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[9] Since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The energy use from residential land uses is calculated based on the CEC Residential Appliance Saturation Survey (RASS), which also incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Stationary-source emissions are estimated separately outside of the CalEEMod software. Stationary sources may include charbroiling of meat that may occur on-site during food preparation activities in the hotel restaurant kitchen. Stationary source emissions are calculated based on emissions factors available from the SCAQMD. In order to provide a conservative analysis, it was assumed that the restaurant would charbroil meat with relatively high emission factors (i.e., hamburger meat and chicken). The quantity of meat charbroiled in the restaurant is based on survey data from the SCAQMD. The estimated emissions account for reductions from compliance with emissions control requirements consistent with SCAQMD Rule 1138.

The existing Galleria Building has an emergency generator on-site that is used to provide electrical power during emergencies. Emissions from this source are generated during routine maintenance and testing. The existing emergency generator would remain on-site to provide electrical power during emergencies and would continue to undergo routine maintenance and testing. As a result, since there would be no net change in emissions from this source, it is not necessary to include in the emissions calculations in the analysis.

Other sources of emissions from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003).*[10] The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin. Emissions of VOCs from the use of consumer products and architectural coatings are based on SCAQMD-specific emission factors for land uses in the South Coast Air Basin.

Emissions calculations for the Project include credits or reductions for energy efficiency measures that are required by regulation, such as reductions in energy from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements. A summary of maximum daily regional emissions

9 California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed December 2013.

10 California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003), http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_ act.pdf. Accessed November 2013.

resulting from Project operation is presented in **Table B-2**, *Maximum Regional Operational Emissions*, along with the regional significance thresholds.

TABLE B-2
MAXIMUM REGIONAL OPERATIONAL EMISSIONS [A]

Operational Activity	VOC	NO_X	CO	SO_X	PM10	PM2.5
Project						
Area (Consumer Products, Landscaping)	22	1	45	<1	0.2	0.2
Energy (Natural Gas)	<1	2	1	<1	0.2	0.2
Stationary (Charbroiling)	<1	—	—	—	0.9	0.9
Motor Vehicles	11	28	111	<1	22.8	6.4
Project Total	**33**	**31**	**157**	**<1**	**24.1**	**7.7**
Existing Site						
Area (Consumer Products, Landscaping)	4	<1	<1	<1	<0.1	<0.1
Energy (Natural Gas)	<1	2	1	<1	0.1	0.1
Motor Vehicles	9	18	76	<1	9.8	2.8
Existing Site Total	**13**	**20**	**77**	**<1**	**9.9**	**2.9**
Maximum Net Regional Emissions	**20**	**11**	**80**	**<1**	**14.2**	**4.8**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	(35)	(44)	(470)	(150)	(135.8)	(50.2)
Exceeds Threshold?						

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA PCR, 2016

As shown in Table B-2, the Project would not generate air pollutant emissions exceeding the SCAQMD thresholds of significance listed above. Therefore, the Project would have a less than significant impact on air quality resulting from long-term operational emissions, and no mitigation measures would be necessary.

a. 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?

Less Than Significant Impact. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Basin is currently in nonattainment for ozone (federal and state standards), PM10 (state standards only) and PM2.5 (federal and state standards), therefore, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD.

In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. As discussed previously under Issue a., the Project would be consistent with the 2012 AQMP.

As the Project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above under Issue b., peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Issue d., below, construction of the Project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the Project in excess of the SCAQMD project-level thresholds would be less than significant.

b. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers;

(3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

Localized Construction Impacts

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).[11] The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the Project. The closest existing sensitive receptors to the Project are multi-family residential uses on the side streets adjacent to the Project Site. The closest future sensitive receptor to the Project is the proposed residential uses of the Project Site. Therefore, thresholds used for the LST analysis were based on a two-acre site in the Central Los Angeles Source-Receptor Area with sensitive receptors located adjacent to the Project Site (i.e., 25 meters).

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized daily significance threshold (LST) methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards. A summary of maximum localized construction emissions resulting from Project construction is presented in **Table B-3**, *Maximum Localized Construction Emissions*, along with the localized significance thresholds.

TABLE B-3
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS [A]

Construction Activity	NO_X	CO	PM10 [B]	PM2.5 [B]
Demolition	5	22	0.7	0.2
Grading/Excavation	2	16	0.3	0.1
Utilities/Trenching	2	5	<0.1	<0.1
Building Construction	5	13	0.1	0.1
Building Construction/Paving/Architectural Coating	7	23	0.1	0.1
Maximum Localized Emissions	**7**	**23**	**0.7**	**0.2**
SCAQMD Threshold [c]	**108**	**1,048**	**8**	**5**
Over/(Under)	(101)	(1,025)	(7.3)	(4.8)
Exceeds Threshold?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[c] LSTs are based on a Project Site area of 2 acres in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA PCR, 2016

11 South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed April 2016.

As shown in Table B-3, Maximum Localized Construction Emissions, maximum daily localized emissions would not exceed the thresholds for NO_X, CO, PM10, or PM2.5 and localized construction impacts would be less than significant.

Construction Health Impacts

The greatest potential for toxic air contaminates (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment usage during demolition, grading and excavation, and building construction activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These products would comply with all applicable SCAQMD rules for their manufacture and use. The Project would be subject to SCAQMD rules designed to limit exposure to TACs during construction activities. The Project would be required to comply with the CARB Air Toxics Control Measure (ATCM) that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Compliance with these regulations would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) if asbestos is found during the renovation and construction activities. Furthermore, the Project would voluntarily implement the control measures described in PDF AIR-1 to further minimize construction emissions.

Health risk impacts (cancer risk) were assessed for existing and future off-site sensitive receptors in the vicinity of the Project Site. The California Environmental Protection Agency (CalEPA) Office of Environmental Health Hazard Assessment (OEHHA) is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance).[12] The analysis incorporates the estimated construction emissions, as previously discussed, and dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station. **Table B-4**, *Maximum Carcinogenic Risk at Off-Site Sensitive Receptors from Construction*, summarizes the carcinogenic risk for the maximum impacted sensitive receptor located in the Project Site vicinity. For carcinogenic exposures, the cancer risk from DPM emissions from construction of the Project is estimated to result in a maximum carcinogenic risk of approximately 5.1 per one million. The maximum impact would occur at sensitive receptors (residences) directly west of the Project Site. As discussed previously, the lifetime exposure under OEHHA guidelines takes into account early life (infant and children) exposure. It should be noted that the calculated cancer risk conservatively assumes

[12] California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, (2015).

that exposure of sensitive receptors (residential uses) would not have any mitigation, such as mechanical filtration. As the maximum impact would be less than the risk threshold of 10 in one million, impacts would be considered less than significant.

TABLE B-4
MAXIMUM CARCINOGENIC RISK AT OFF-SITE SENSITIVE RECEPTORS FROM CONSTRUCTION

Sensitive Receptor	Maximum Cancer Risk (# in one million)
Residence-West of Project Site	5.1
Maximum Individual Cancer Risk Threshold	10
Exceeds Threshold?	No

SOURCE: ESA PCR, 2016

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. As shown in **Table B-5**, *Maximum Non-Cancer Chronic Impacts at Off-Site Sensitive Receptors,* nearby off-site sensitive receptors would not be exposed to chronic impacts that would exceed the threshold of 1.0. The maximum impact, approximately 0.007 Hazard Index, would occur at sensitive receptors directly east of the Project Site. Therefore, non-cancer chronic impacts would be considered less than significant.

TABLE B-5
MAXIMUM NON-CANCER CHRONIC IMPACTS AT OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Chronic Hazard Index
Residence-West of Project Site	0.007
Maximum Individual Cancer Risk Threshold	1.0
Exceeds Threshold?	No

SOURCE: ESA PCR, 2016

The process of assessing health risks and impacts includes a degree of uncertainty. The level of uncertainty depends on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public. In general, sources of uncertainty that may lead to an overestimation or an underestimation of the risk include extrapolation of toxicity data in animals to humans and uncertainty in the exposure estimates. In addition to uncertainty, there exists “a natural range or variability in measured parameters defining the exposure scenario” and that the “the greatest quantitative impact is variation among the human population in such properties as height, weight, food consumption, breathing rates, and susceptibility to

chemical toxicants."[13] As mentioned previously, it is typical to err on the side of health protection by assessing risk on the most sensitive populations, such as children and the elderly, by modeling potential impacts based on high-end breathing rates, by incorporating age sensitivity factors, and by not taking into account exposure reduction measures, such as mechanical air filtration building systems. As a result, the construction HRA conducted for the Project is considered to be based on conservative and health protective modeling factors.

Localized Operational Impacts

The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the Project. With regard to on-site sources of emissions, the Project would generate emissions resulting from sources such as natural combustion (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters) and landscaping equipment. As discussed previously, the existing Galleria Building has an emergency generator on-site. Since the existing emergency generator would remain on-site, there would be no net change in emissions from this source and it is not necessary to include the emissions calculations in the analysis. A summary of maximum localized operational emissions resulting from Project construction is presented in **Table B-6**, *Maximum Localized Operational Emissions*, along with the localized significance thresholds.

TABLE B-6
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS [A]

Operational Activity	NO_x	CO	PM10	PM2.5
Project				
Area (Consumer Products, Landscaping)	1	45	0.2	0.2
Energy (Natural Gas)	2	1	0.2	0.2
Stationary (Charbroiling)	—	—	0.9	0.9
Project Total	**3**	**46**	**1.3**	**1.3**
Existing Site				
Area (Consumer Products, Landscaping)	<1	<1	<0.1	<0.1
Energy (Natural Gas)	2	1	0.1	0.1
Existing Site Total	**2**	**1**	**0.1**	**0.1**
Maximum Net Localized Emissions	**1**	**45**	**1.2**	**1.2**
SCAQMD Threshold [b]	**108**	**1,048**	**2**	**2**
Over/(Under)	(107)	(1,003)	(0.8)	(0.8)
Exceeds Threshold?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.
[b] LSTs are based on a Project Site area of 2 acres in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA PCR, 2016

[13] California Environmental Protection Agency, Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, (2015) 1-5.

As shown in Table B-6, on-site sources of emissions would remain below SCAQMD LST thresholds and localized operational impacts would be less than significant.

Carbon Monoxide Hotspots

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found in proximity to congested roadway intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (i.e., congested intersection) increases. For the purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed at congested intersections, because if impacts are less than significant in proximity of the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

Carbon monoxide decreased dramatically in the Basin with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin in recent years and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Localized areas where ambient concentrations exceed state and/or federal standards are termed "CO hotspots". Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions.

Project traffic during the operational phase of the Project could have the potential to create local area CO impacts. The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing impacted Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

The SCAQMD recommends a hotspot evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. Based on the traffic impact analysis prepared for the Project (summarized in Section 16, Transportation/Circulation, below), the intersection of Vermont Avenue/Wilshire Boulevard operates at LOS E during the A.M. and P.M. peak hours, and the intersection of Vermont Avenue/Olympic Boulevard operates at LOS D during the A.M. and P.M. peak hours. However, the Project would not meet the SCAQMD criterion of hotspot evaluation because it would not increase the V/C ratio by 2 percent. Therefore, additional localized CO analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.[14] This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[15] When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

In comparison, based on the Project Traffic Study, of the studied intersections that are predicted to operate at a Level of Service ("LOS") of D, E, or F under future year 2020 plus Project conditions, average daily traffic volumes would result in fewer than 100,000 vehicles per day.[16] Therefore, CO concentrations are expected to be less than the CO concentrations measured as part of the AQMP CO attainment demonstration and would not exceed SCAQMD significance thresholds. This comparison provides evidence that the Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

The proposed parking structure would be built in accordance with applicable City of Los Angeles Municipal Code requirements, and as such, would be required to provide adequate mechanical ventilation and dispersion of potential emissions to acceptable ambient concentrations so as not pose any public health hazards. Therefore, the parking structure would result in less than significant impacts with respect to CO hotspots.

Operational Health Impacts

Project operations would generate only minor amounts of diesel fuel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operations are not considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. The Project's hotel restaurant uses could potentially generate TACs if charbroiling activities occur at the restaurant, which has the potential to generate small amounts of chemicals

14 South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.
15 The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.
16 Overland Traffic Consultants, Inc, Traffic Impact Analysis, 320 Wilshire Mixed-Use Development Project, (2016).

that are known or suspected by the State of California to cause human health impacts.[17] However, restaurant charbroiling in the Basin would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would reduce the already small amounts of TAC emissions associated with charbroiling by approximately 83 percent,[18] such that adverse health impacts are not expected to occur at nearby sensitive receptors. Project-related natural gas combustion for cooking and heating would not generate a measurable net increase in TAC emissions that would contribute to an increase in health risk impacts.[19] As discussed previously, the existing Galleria Building has an emergency generator on-site. Since the existing emergency generator would remain on-site, there would be no net change in emissions from this source and there would be no net change in health risk impacts from this source.

As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The closest existing sensitive receptors to the Project are multi-family residential uses on the side streets adjacent to the Project Site. The closest future sensitive receptor to the Project is the proposed residential uses on the Project Site. Potential sources that may emit odors during Project construction activities include diesel trucks and equipment and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a listed source of odors. Compliance with existing regulations, including the CARB anti-idling regulation that limits idling to five minutes or less at any location and the use of CARB certified Tier 3 and Tier 4 heavy-duty equipment (PDF-AIR-1) which reduces emissions, would minimize the potential for odorous emissions. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors.

The Project's proposed uses would not typically generate nuisance odors at nearby sensitive receptors during operation. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve elements related to these types of uses. However, a

17 U.S. Environmental Protection Agency, Polycyclic Aromatic Hydrocarbons (PAHs), January 2008, http://www.epa.gov/osw/hazard/wastemin/minimize/factshts/pahs.pdf. Accessed April 2016.

18 U.S. Environmental Protection Agency, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, (2003).

19 Natural gas is considered Best Available Control Technology (BACT) for boilers. Refer to SCAQMD Best Available Control Technology Guidelines, Part D: Non-Major Polluting Facilities. Available: http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/part-d---bact-guidelines-for-non-major-polluting-facilities.pdf?sfvrsn=4. Accessed July 22, 2016.

series of trash rooms would be provided within the proposed buildings. Commercial trash receptacles would 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 would not be required to observe this minimum buffer (see PDF AIR-3). With proper housekeeping practices, building trash receptacles would be maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. Restaurant uses could generate odors from cooking operations; however, the use of standard range hoods and proper cleaning of cooking equipment and housekeeping practices would prevent adverse odors. If charbroiling would occur in the restaurant uses, emissions control requirements consistent with SCAQMD Rule 1138 would minimize the potential for odorous emissions. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance) and Rule 1138, and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level.

Project Design Features

PDF AIR-3 Commercial Trash Receptacles: 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.

4. Biological Resources

Would the project:

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in a highly urbanized area and is currently developed with the Galleria Building, a surface parking lot, with limited landscaping near the *porte cochere* and street trees along the adjacent roadways. The Project Site does not contain habitat suitable for native species and does not contain candidate, sensitive or special status species. Therefore, no impacts to candidate, sensitive, or special status species would occur.

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?

No Impact. The Project Site is developed with the Galleria Building and a surface parking lot and does not contain riparian habitat or sensitive natural communities. The Project Site is not located within or adjacent to a significant ecological area (SEA).[20] Therefore, implementation of

[20] City of Los Angeles General Plan Conservation Element, Figure B-2, SEAs and other Resources, March 2001.

the Project would not result in a substantial adverse effect on riparian habitat or other sensitive natural community and no mitigation measures are required.

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

No Impact. The Project Site is developed and the pervious areas are landscaped with non-native species and do not contain wetlands defined by Section 404 of the Clean Water Act. Therefore, Project implementation would not impact Federally protected wetlands. No impacts would occur and no mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is currently developed and located in a highly urbanized area the City of Los Angeles. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the Site is negligible.

Nonetheless, the Project does include ornamental and street trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). 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). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Mitigation provided below would reduce this impact to a less than significant level.

Mitigation Measure

MM BIO-1 The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways.

1. Construction activities with the potential to disturb nesting birds shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed. If construction activities are outside of the nesting season, then No. 2 below is not needed. If construction activities that could impact nesting birds occur during the nesting season, then No. 2 below shall be implemented.

2. Any construction activities that occur during the nesting season shall require that all suitable habitat (i.e., street trees) be thoroughly surveyed for the presence of nesting

birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Building and Safety. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors) shall be delineated, flagged, and avoided until the until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

If the biologist determines that a narrower buffer between the Project construction activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the City and, upon request, the California Department of Fish and Wildlife Service. Based on the submitted information, the City (and the Department, if the Department requests) shall determine whether to allow a narrower buffer.

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

Less Than Significant Impact. There are several non-native ornamental trees, consisting of queen palms, silk floss trees, and bronze loquats, located within the Project Site near the *porte cochere*, in addition to street trees along the public street frontages facing the Project Site. All of the trees within the interior of the Project Site would be retained or relocated on-site by the Project. The parkway strip between the sidewalk and New Hampshire Avenue is currently planted with 11 mature *ficus rubiginosa* street trees running the entire block between Wilshire Boulevard to the north and 7th Street to the south. Two *ficus nitida* trees are planted along the 7th Street frontage and three camphor trees are planted along the Wilshire Boulevard frontage. None the interior or street streets are protected trees. Potentially, some of the street trees along New Hampshire and 7th Street would be removed under the Project. There would be no trees affected by proposed construction on contiguous properties.

The Project would incorporate a landscape plan, which would include the planting of new trees, shrubs, and groundcover. All street trees removed by the Project would be replaced, as necessary, in accordance with the applicable policies of the City's Street Tree Ordinance, or as otherwise necessary per City requirements. The City's Street Tree Ordinance requires all significant, non-protected trees to be replaced at a minimum of 1:1 ratio. The number of street trees proposed by the Project would meet or exceed the requirements of the City's Street Tree Ordinance. The final number and location of street trees would be determined in consultation with the City's Urban Forestry Division. All other landscaping components would comply with applicable LAMC requirements. Compliance with applicable City Street Tree Ordinance provisions and LAMC requirements would ensure that impacts are less than significant.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. As discussed above, the Project Site is not located within a SEA. Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site. Therefore, implementation of the Project would not conflict with a habitat conservation plan and no mitigation measures are necessary.

5. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resources as defined in State CEQA §15064.5?

Less Than Significant Impact With Mitigation Incorporated. The analysis of impacts to historic resources is based on the *Historical Resources Assessment Report and Environmental Impact Analysis*, prepared by ESA PCR in July 2016, which is included as Appendix C of this MND. A Project Site visit was conducted by qualified ESA PCR architectural historians to identify historical resources over 45 years in age on the Project Site and vicinity and to assess potential Project impacts on such resources. The Project Site contains one, six-story modern style building, 3240 Wilshire Boulevard, originally constructed between 1939 and 1930 as I. Magnin & Company's Wilshire Boulevard location. Presently known as the Wilshire Galleria, it was designed by architectural firm Hunt & Chambers and built by William Simpson Construction Company. Timothy Pflueger served as interior designer, with interior murals executed by artist Jesse A. Blotke, Esther Bruton, and Jean Dunand. The I. Magnin & Company Wilshire Boulevard location closed in 1990 and reopened in 1992 as the Wilshire Galleria.

A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register of Historical Resources ("California Register" or "CR"), included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

A substantial adverse change in the significance of a resource is considered a potentially significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Direct impacts are those that

cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property such that the significance of a historical resource would be materially impaired.

The subject property was locally designated as a City of Los Angeles Historical-Cultural Monument ("HCM") on June 11, 1991 (HCM-534). On September 4, 2008, PCR Services Corporation evaluated 3240 Wilshire Boulevard as part of the Historic Resources Survey of the Wilshire Center/Koreatown Recovery Redevelopment Project Area ("2008 Survey"). At that time, the subject property was assigned a California Historical Resources ("CHR") Status Code of 5S1, confirming it as an "Individual property that is listed or designated locally."

ESA PCR reevaluated the Galleria Building to determine the extent of alterations since the 2008 Survey and identify extant character-defining features that continue to convey its significant historical associations. ESA PCR's architectural historians conducted an intensive pedestrian survey, research, and evaluation of the Galleria Building and its surroundings in association with this Report. The Galleria Building was evaluated under the following historical and architectural themes: Development of Wilshire Boulevard (1890-1940), including the Wilshire Boulevard Heights Tract in which the subject property is situated; I. Magnin & Company Department Store (1876-1995); Prewar Modernism in Los Angeles (1919-1945); Hunt & Chambers (1920-1947); and Timothy Pfleuger (1892-1946). The Galleria Building is associated with the following SurveLA historical theme: Commercial Development (1850-1980): Department Stores (1920-1980). ESA PCR found the Galleria Building to retain integrity of location, design, and feeling. Therefore, the Galleria Building retains sufficient integrity to convey an association with the above SurveyLA theme. ESA PCR concluded that the Galleria Building appears individually eligible as a historical resource at the federal, state, and local levels under National Register of Historic Places ("National Register" or "NR") Criterion A and C, California Register Criterion 1 and 3, and the HCM criteria pertaining to history and architecture. The Galleria Building is associated with the development of Wilshire Boulevard during the 1920s and 1930s as the finest shopping district in Southern California. It is also an excellent and intact example of an early twentieth-century department store featuring a modern design, as well as a notable example of the prolific architectural firm Hunt & Chambers. Therefore, ESA PCR assigns the subject property the following CHR Status Codes, in addition to 5S1: 3S, "Appears eligible for NR as an individual property through survey evaluation," and 3CS, "Appears eligible for CR as an individual property through survey evaluation."

Historic Context

Development of Wilshire Boulevard (1890-1940) and Wilshire Boulevard Heights Tract. Few factors were as crucial to the development of Los Angeles's built form as the advent of the private automobile. In the 1920's, A.W. Ross developed a shopping area, Miracle Mile, designed to accommodate automobiles by providing wider streets and parking behind retail stores. A. W. Ross began developing the area in 1923, buying property along a seventeen block stretch of Wilshire Boulevard, between La Brea Avenue to the east and Fairfax Avenue to the west. Ross wanted the form and scale of his Wilshire strip to attract and serve automobile traffic rather than

pedestrian shoppers and he played a decisive role in the choice and arrangements of tenants as well as the size, location, and character of the buildings.

The very success of the Wilshire Boulevard corridor was a powerful testament of shifts in public tastes and preferences. As driving Downtown to conduct business became increasingly inconvenient, the amenities along Wilshire Boulevard provided a pleasant and attractive alternative. While the commercial decentralization out of Downtown Los Angeles began in the early 1920s, it wasn't until the late 1920s and 1930s that commercial centers west of Downtown, like Wilshire Boulevard, became true retail destinations. With the increased use of the automobile and a growing residential population near Wilshire, developers touted Wilshire Boulevard's diverse selection of department stores and wide, auto-oriented streetscape.

Built in 1929, the upscale Bullock's Wilshire, about a quarter of a mile east of the Project Site, inaugurated a new era of suburban department store retailing. Designed by John and Donald Parkinson, Los Angeles' renowned father-and-son architectural team, the five-story Art Deco style building became an instant beacon for Wilshire Boulevard upon completion. With its spacious porte-cochere and valet parking service, the new Bullock's store was unlike any department store yet built. The success of Bullock's Wilshire paved the way for other Downtown-based department stores to open branches along Wilshire Boulevard in the 1930s and early 1940s. Urbane sophistication came in the form of I. Magnin & Company's Wilshire location (the subject property) and Mullen & Bluett department store, located just over three miles to the west of the Project Site at 5570 Wilshire Boulevard. Further west along the Miracle Mile, Desmond's, Silverwoods, and The May Company opened large stores. Major retailers such as Coulter's, Myer Siegel, C.H. Baker, and Seibu eventually spread across Wilshire Boulevard from Fairfax to La Brea.

The subject property is located in the Wilshire Boulevard Heights Tract, subdivided in 1904 by the Title Insurance & Trust Company. The tract is roughly bound by Wilshire Boulevard to the north, South Vermont Avenue to the east, San Marino Street to the south, and South Catalina Street to the west, and also includes the lots on the western side of South Catalina Street. A Sanborn map dating from 1921 illustrates the predominantly residential character of the Project Site and vicinity prior to the tract's redevelopment in the late 1920s and 1930s as a commercial hub. On the Sanborn map, the Project Site is seen improved with six residential buildings (with detached rear garages) ranging in height from two to two-and-one-half stories. Between 1938 and 1939, the Project Site was completely redeveloped to accommodate the Galleria Building and a large customer parking lot at the rear. A 1955 Sanborn map shows the changed appearance of the area, especially along Wilshire Boulevard, by the postwar period.

I. Magnin & Company Department Store (1876-1995). Mary Magnin established I. Magnin & Company, named for her husband Isaac, in 1876 in San Francisco to cater to women and children. The store expanded and moved into new facilities, requiring, by 1900, an even larger space. Thus, I. Magnin & Company commissioned a building in San Francisco on the corner of Geary Street and Grant Avenue. Due to the San Francisco earthquake of 1906, the store's opening was delayed until 1909. From there, I. Magnin & Company expanded throughout California with stores in Los

Angeles, Pasadena, Coronado, Palm Springs, Santa Barbara, Del Monte, and Oakland and also opened a store in Seattle, Washington. In 1944, I. Magnin & Company was purchased by Bullock's Inc. Through a series of mergers and consolidations, I. Magnin & Company officially closed in 1995 under the direction of then owner Macy's.

Until I. Magnin & Company's Wilshire location (the subject property) opened in 1939, the company held small satellite shops in Los Angeles which were consolidated into the new construction. The Galleria Building was constructed by the Capitol Company for long term tenant, I. Magnin & Company. 3240 Wilshire Boulevard is clad in Yule Colorado marble with a black granite base while the interior is decorated with marbles from Tennessee (for the floors), France, Italy, Belgium, and Holland. In addition, the modernity of the Galleria Building was widely promoted: it featured complete electrical systems including air-conditioning. The Building also featured a fourth floor (currently fifth floor) patio (no longer extant) opening to the sky and lush with plants and, following the precedent of Bullock's Wilshire constructed in 1929, incorporated a sizeable rear parking lot and grand porte-cochere. The Galleria Building was larger than any of the company's other stores.

Prewar Modernism in Los Angeles (1919-1945). 3240 Wilshire Boulevard offers a blend of prewar modern styles in Los Angeles. In early twentieth century Los Angeles, architects easily blended elements from different styles during a period in which automobile culture and Southern California living were enjoyed by residents and tourists alike. In particular, commercial architecture in the 1930s sought to capture the eyes, and therefore business, of a fast-moving population. Buildings needed to make a statement that was easily interpreted by the public. Along Miracle Mile, for example, modern buildings reflect these intentions such as diners and drive-ins, theatres and offices, and department stores; ornamented buildings curve at corners and large windows show off interiors. In addition, programmatic architecture, also popular in the 1920s and 1930s, clearly expresses the function of a given building allowing the fast-moving population to make quick decisions.

3240 Wilshire Boulevard prefigures the use of International Style modernism in local commercial buildings due to its objective program, which is modern in spirit. However, the Galleria Building also evokes Classical precedence. Classical suggestions include applied ornament, such as the relief panel above the Wilshire Boulevard entrance, and pilasters, fluted to recall Classical columns, dividing the Building's elevations into vertical bays. Additionally, the Building is representative of the two-part vertical block type (the façade is comprised of a shallow base superimposed by a multi-story block) which can be traced back to commercial building design in the late nineteenth-century but has its roots in antique precedence. However, the two-part vertical block type is interpreted in a modern way, with the application of contemporary building materials and minimal use of ornamentation.

Hunt & Chambers (1920-1947). Hunt and Chambers (1920-1947) completed many large-scale commissions during their partnership. After his promotion, Chambers was primarily responsible for commercial projects while Hunt focused on residential commissions. Projects of Hunt and Chambers include: County National Bank in Santa Barbara (1924-1927), master plan and

buildings for Occidental College (1922-1947), the Huntington and Pasadena city libraries (1919-1920 and 1927 respectively), hospitals, residences, and even California military bases for the war effort. In addition to their work for 3240 Wilshire Boulevard, they completed prior work for I. Magnin & Company by remodeling its existing department stores in Hollywood (1928, 1930 and 1934) and Palm Springs (1935). Hunt retired in 1947 but continued to consult with Chambers until 1951. Through their partnership, Hunt and Chambers came to be one of the most successful firms in the region.

Timothy Pfleuger (1892-1946). Timothy Pflueger was born in San Francisco where he lived with his mother until his death. He did not complete high school but after the 1906 San Francisco earthquake began his design career. By 1907 he was a draftsman and soon apprenticed with Miller and Colmesnil. He partnered with Miller to form Miller and Pflueger (1923-1937) and was the principal of Timothy Pflueger (1937-1946). He trained in the Beaux-Arts style through Miller and classes at the San Francisco Architectural Club but shifted toward modern styles in the 1920s. His most notable works include: The Sutter Building (1929), The Pacific Telephone Building (1924), the San Francisco Stock Exchange (1930), and the I. Magnin & Company department stores (1930s-40s). In addition, he was on the team of architects that designed the San Francisco Bay Bridge (1933-36). Pflueger consistently incorporated art work into his architecture, even commissioning Diego Riviera for murals.

Timothy Pflueger completed several projects for I. Magnin & Company. At 3240 Wilshire Boulevard, he combined many luxurious materials together, including Rose de Brignoles, a beige-pink marble from France. Indeed, the interior was decidedly feminine through the use of pinks and beiges. Moreover, Pflueger mirrored the circular shape of the exterior porte-cochere on the interior, such as in the main first floor room with its magnificent chandelier. In the 1940s, after completing the 3240 Wilshire Boulevard, he worked on the Beverly Hills I. Magnin & Company store in Los Angeles and then the new Santa Barbara store. Furthermore, he completed the large San Francisco store.

William Simpson Construction Company (1903). William Sampson (d. 1917) opened the William Sampson Construction Company in 1903 in Denver, Colorado after over twenty years as a builder. In 1912 the company moved to San Diego, California and then in 1915 to Los Angeles, California. Prior to 1920 the company worked on rail road and government projects. In the 1920s the company primarily completed work in San Diego including buildings at the U.S. Naval Hospital at Balboa Park and the El Cortex Hotel (1927). In the 1930s the company primarily completed work in Los Angles including the I. Magnin Department Store Building and the Griffith Park planetarium. During the war the company completed projects for the U.S. Navy but returned to private construction at the war's end.

Jesse A. Blotke (1883-1971). Born in Chicago, Illinois in 1883, Jessie Arms Blotke is well known for her bird scenes. She enrolled in the Chicago Art Institute in 1902 and after moving to New York in 1911, obtained a position as a designer for Herter Looms where she was granted many commissions. In 1915, Blotke moved back to Chicago and married Cornelius Blotke. In

1918, they moved to Carmel, California and remained in California. Blotke created many bird scenes throughout her career including the crane panel for the I. Magnin Wilshire.

Esther Bruton (1896-1992). Esther Bruton was born in Alameda, California on October 17, 1896. Her two sisters, Margaret (1894-1983) and Helen (1898-1985) were also artists. Bruton studied art in New York with George Bridgeman at the Art Students League and at the New York School of Fine and Applied Arts. She first worked as an illustrator for Lord and Taylor department store before returning to California and obtaining a position as an illustrator for I. Magnin department store. During the 1930s she turned her attention from illustrating to fine art. She completed murals for the I. Magnin Wilshire department store. In addition, note is given to her circus themed murals at the San Francisco Fairmount's cocktail lounge.

Jean Dunand (1877-1942). A renowned French Art Deco artist, Jean Dunand made and decorated furniture and decorative arts with lacquer. Originally from Switzerland, Dunand studied at the Ecole des Arts Industriels, Geneva and in Paris with Jean Dampt, an Art Nouveau sculptor. Interested in Asian techniques, Dunand also took lessons from a Japanese lacquer expert in 1912. During the 1920s and 1930s he frequently exhibited his work. Dunand contributed to the field of lacquer work through his experimentation and ingenuity. Moreover, he collaborated with other artists. For the I. Magnin Wilshire, Dunand painted a mural for the second floor full salon featuring black panthers on a gold background.

Historical Significance

The Galleria Building is associated with the development of Wilshire Boulevard during the 1920s and 1930s as the finest shopping district in Southern California. During these two decades, commercial centers west of Downtown, like Wilshire Boulevard, became true retail destinations. With the rise of automobile culture and a growing residential population near Wilshire, developers touted Wilshire Boulevard's diverse selection of department stores and wide, auto-oriented streetscape. Although later infill along Wilshire Boulevard has compromised its setting, the Galleria Building retains sufficient integrity to convey a significant association with a department store erected along Wilshire Boulevard during the early twentieth-century when that area developed as a major retail hub.

The Galleria Building is also an excellent and intact example of an early twentieth-century department store featuring a modern design, as well as a notable example of prolific architectural firm Hunt & Chambers. The Galleria Building was constructed between 1938 and 1939 by the Capitol Company for long term tenant, I. Magnin & Company along Wilshire Boulevard, which, as mentioned above, was developing at that time as Southern California's finest shopping district. I. Magnin & Company hired local architectural firm Hunt & Chambers, with whom it had previously worked, to design the Galleria Building. Constructed at a substantial cost, the Galleria Building was a significant commission within the trajectory of master architects Hunt & Chambers' architectural work, and it was one of I. Magnin & Company's largest stores.

Additionally, the Galleria Building retains a painted lacquer mural by Jean Dunand, who appears to have been a significant artist for the purposes of this assessment, featuring black panthers on a

gold background. The mural is in its original location on the third floor in what would have originally been the Fur Salon. More research is needed to determine if murals by Jesse A. Blotke and Esther Bruton are still extant. Moreover, the Galleria Building features decorative panels by sculptor Mario Rosandich, including a panel portraying a leaping stag and deer amongst foliage on the primary (north) elevation. Rosandich may have also have been responsible for the decorative panels featuring gazelle motifs that adorn the interior of the ground floor, as they strongly resemble the panel on the primary elevation. However, more research is needed to determine if Rosandich was a prolific or otherwise influential sculptor.

Timothy Pflueger, a prolific designer, responsible for the interior of I. Magnin & Company's San Francisco store, designed the Galleria Building's interiors. However, more research is also needed to determine if features designed by Pflueger are still extant.

Finally, the Galleria Building is significant for exemplifying a blend of prewar modern styles in Los Angeles. In early twentieth century Los Angeles, architects easily blended elements from different styles in order to capture the spirit of a period in which automobile culture and Southern California living were prominent and enjoyed by residents and tourists alike. The Galleria Building prefigures the use of International Style modernism in local commercial buildings due to its objective program, which is modern in spirit. However, the Galleria Building also evokes Classical precedence.

Impacts Assessment

A detailed discussion of impacts is provided in the *Historical Resources Assessment Report and Environmental Impact Analysis* and summarized herein. The Project would retain and rehabilitate the locally designated Galleria Building in conformance with the Secretary of the Interior's Standards. Under the Project, the Galleria Building would be adaptively reused as a hotel, and its existing elevations, as well as the porte-cochere, would be retained, along with the majority of the character-defining features that contribute to the subject property's eligibility as an HCM. The Project seeks to maintain significant character-defining features, such as the Galleria Building's massing, exterior cladding materials, ornamentation, and windows, displaying the original construction techniques and craftsmanship. Most of the Galleria Building's interiors were altered, especially after the subject property's sale to Macy's in 1990. As a result of these alterations, only the ground floor and a small section of the third floor (former Millinery Salon, eastern part of former Exclusive Apparel Salons, and former Fur Salon) retain character-defining features. The Project would restore the cross-axial plan of the ground floor and retain the majority of character-defining features in this area. On the third floor, the Project would adaptively reuse the former salons as two hotel suites, retaining character-defining features to the greatest extent possible. The Project would also redevelop the rear asphalt surface parking lot south of the Galleria Building on the Project Site with a mid-rise and a high-rise mixed-use building.

Because the Galleria Building is considered a historical resource pursuant to CEQA, ESA PCR analyzed direct, indirect, and cumulative impacts to historical resources resulting from the Project. As a result of its investigations, ESA PCR concluded that the Galleria Building would

remain eligible as a historical resource at the national, state, and local levels after Project completion with implementation of mitigation measures. The proposed mid- and high-rise buildings on the Project Site would not materially destroy or alter the Galleria Building or any of its character-defining features and would not be physically connected to it. Therefore, the proposed buildings would not result in significant direct impacts to historical resources on the Project Site. Although the Project would retain the Wilshire Galleria's primary character-defining features, some of the character-defining features may require alteration in order to accommodate its change of use as a hotel. Although alterations to the Galleria Building would be carried out in conformance with the Standards, Mitigation Measures HIST-1 and HIST-2, as prescribed detailed below, would ensure that the Galleria Building retains its eligibility as a historical resource. The mitigation measures include the preparation of a Rehabilitation plan and plan reviews for conformance to the Standards and a Historic American Buildings Survey ("HABS") Level II report to record and document the Galleria Building's character-defining features. Incorporation of the mitigation measures below would reduce the potentially significant impacts to the Galleria Building to a less than significant level, and after Project completion, the Galleria Building would remain eligible as a historical resource at the state and local levels. After mitigation, historical resources in the Project vicinity would also retain their eligibility.

Mitigation Measures

MM HIST-1 **Rehabilitation and Construction Monitoring**. To protect and preserve the integrity of the Galleria Building as a historical resource, a Rehabilitation Plan shall be prepared by a qualified preservation consultant ("Preservation Consultant") retained by the applicant to inform the design and oversee implementation of the Rehabilitation Plan so that the Project conforms with the Secretary of the Interior's Standards for Rehabilitation. The Preservation Consultant shall meet the Secretary of the Interior's professional qualification standards in history, architectural history or historic architecture, with at least 10 years of experience conducting similar projects. The Preservation Consultant shall prepare a Rehabilitation Plan for the proposed adaptive reuse of the Galleria Building which is consistent with the analysis, identified impacts and findings of the Historical Resources Assessment Report and Environmental Impact Analysis, prepared by ESA PCR in July 2016 (collectively the "Historic Assessment"), review the design and construction plans to verify the Project's conformance with the Standards and Historic Assessment, and prepare draft and final plan review letters for submittal to the City Planning Department, Office of Historic Resources. The Rehabilitation Plan shall retain and preserve the character-defining features as identified and documented in the Historic Assessment and include appropriate recommendations for the treatment of these features. Once design and construction plans have been prepared, and prior to issuance of a building permit, the Preservation Consultant shall review the Project for conformance to the Standards and Historic Assessment, and provide a final plan review letter summarizing the review findings to the City Planning Department, Office of Historic Resources. Once the Project has been approved by the City, the Preservation Consultant shall visually inspect construction associated with the Galleria Building at regular intervals to address any unanticipated discoveries that may require preservation treatment, ensure Project conformance with the Standards and Historic Assessment, and minimize potential damage to historic fabric. The Preservation Consultant shall document the construction monitoring process in digital photography as well as monitoring logs, and prepare a final monitoring report to be submitted to the City Planning Department, Office of Historic Resources.

MM HIST-2 **HABS Level II Report**. It is also recommended that the existing conditions of the Galleria Building be recorded in a HABS Level II report which would serve as a base line reference for the Project and any other future work that may be undertaken for the building. The HABS would record character-defining architecture, spaces, elements and features of the Project Site, photographically in professional archival large format 4" x 5" black-and-white photographs, provide a detailed architectural description of the building along with a narrative history of construction, alterations, and statement of significance. The HABS Level II report would include supplementary color 35mm photographs of architectural details, materials and features to record color, materials and texture not apparent in black-and-white photographs. Supplementary materials shall also include archivally reproduced historic photographs, historic illustrations and advertisements, and historic architectural plans depicting the historic appearance of the property during the period of significance. The HABS Level II report would document existing conditions including those portions of the building to be demolished as well as the portions of the building to be retained. The HABS Level II report would reduce the potential impacts of removal of remaining interior features, any alterations of the Galleria Building. The HABS Level II report should be archivally produced and deposited in a publically accessible library or museum archive such as the Library of Congress, Los Angeles Public Library, and the City of Los Angeles Office of Historic Resources.

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

Less Than Significant Impact With Mitigation Incorporated. This section summarizes the *Cultural Resources Assessment Report* prepared by ESA PCR for the Project, which is included as Appendix D of this MND. The analysis of archaeological resources is based on a cultural resources records search through the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search (requested on April 21, 2016) from the Native American Heritage Commission (NAHC) in Sacramento, follow-up consultation with Native American groups or individuals, a review of Sanborn Fire Insurance maps, a review of the Preliminary Findings Geotechnical Engineering Exploration for 3320-3240 Wilshire Boulevard, (the "Geotechnical Report") prepared by Irvine Geotechnical, dated July 22, 2015 (included as Appendix E of this MND), and a review of the proposed excavation parameters.

Results of the cultural resources records search conducted through CHRIS-SCCIC indicate that a total of 31 studies have been conducted within the one-half mile radius from the Project Site. Of these 31, none encompassed the Project Site. A total of 21 resources [20 built environment resources and one historic archaeological site (P-19-003301)] have been recorded within the one-half mile radius of the Project Site. P-19-003301 was recorded within close proximity to the Project Site (approximately 500 to 800 feet north) and is described as a "trash lens" and remnants of the Pacific Electric (PE) Red Car tracks. The trash lens was noticed during grading of Segment 2 for the Wilshire/Vermont Station of the Metro Red Line Project. Among the artifacts found include brown and amber glass fragments, red brick, firebrick, clay floor tile, ceramic tile and portion of a flower pot. As the artifacts were not diagnostic, most of them were discarded. The remnants of the PE Red Car tracks consisted of two sets of light rail/trolley tracks (that rested

on wooden ties), a metal pipe and a vertical wooden board that were encountered during the removal of a road surface along Vermont Avenue.

Review of the 1921 Sanborn map indicates that the entire Project Site was previously developed with six residential buildings (with detached rear garages) ranging in height from two to two-and-one-half stories. In addition, according to the Historical Resources Assessment Report prepared by ESA PCR, between 1938 and 1939, the Project Site was completely redeveloped to accommodate the Galleria Building and a large customer parking lot at the rear. Review of the 1955 Sanborn map, depicts the changed appearance of the Project Site with the already developed Galleria Building and parking lot.

Review of the Geotechnical Report indicates that fill can be found within the Project Site down to a depth of three feet below the surface. The fill consists of grey-brown silty sand and contains brick and asphalt debris that may be associated with the former uses at the Project Site.

The Project would include excavations across the Project Site for subterranean parking to an approximate depth of 30 feet below ground surface. Given the identification of one historic archaeological resource that has been recorded within close proximity to the Project Site, the land use history (previous residences within the Project Site as depicted in the 1921 Sanborn map) and the Geotechnical Report information which demonstrated that brick and asphalt debris can be found beneath the surface at the Project Site, the potential to encounter buried archaeological deposits associated with the former uses during construction appears to be high. In addition, although excavations associated with the original construction of the Galleria Building have likely displaced any prehistoric or historic archaeological resources on the surface or at depth in that particular area of the Project Site, the potential still exists to encounter buried resources (e.g., bottles, foundations, refuse dumps/privies, Native American artifacts, etc.) in other areas. In particular, it is possible that the existing surface parking lot at the Project Site has sealed archaeological resources deeper below the surface as excavations for parking lots are typically shallow and would therefore, not disturb or displace deeper archaeological resources, while the asphalt pavement may have served as a barrier that prevented further impacts to these resources. As a result of these findings, Mitigation Measures ARCH-1 to ARCH-3 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that are discovered during Project construction activities are reduced to a less than significant level.

Mitigation Measures

> **MM ARCH-1** The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the archaeological monitor.

MM ARCH-2 In the event that archaeological resources (e.g., bottles, foundations, refuse dumps/privies, Native American artifacts, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist. The Applicant shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. In preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school, historical society, or other organization in the area for educational purposes.

MM ARCH-3 The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

c. Directly or indirectly destroy a unique paleontological resource or unique geological feature?

Less Than Significant Impact With Mitigation Incorporated. The analysis of paleontological resources is based on a paleontological records search that was commissioned through the Natural History Museum of Los Angeles County (NHMLAC), a review of the Geotechnical Report, and a review of the proposed excavation parameters. The paleontological resource records search results letter from the NHMLAC is provided in Appendix D of this MND. Results of the record search at the NHMLAC revealed that the Project Site is composed of older Quaternary alluvium and that several localities (LACM 6204, 3250 and 5845) from these same deposits have been recorded approximately 0.75 to 1.25 miles from the Project Site that yielded two fossil specimens of mammoth (at an unknown depth and 8 feet below the street) and one mastodon at a depth of 5 to 6 feet below the surface, respectively. Moreover, exposures of the marine late Miocene Puente Formation (also referred to as the Upper Modelo Formation) (i.e., 12 to 5.3 million years ago) are also known to exist approximately one-quarter mile north of the Project Site and it is possible that these deposits underlie the Quaternary alluvium in the Project Site at a relatively shallow depth. Two fossil localities (LACM 6202 and 6203) from the Puente Formation have also been recorded within close proximity to the Project Site (approximately 500 feet north of the Project Site and at a depth of 60 to 80 feet beneath the surface). LACM 6202 yielded fossil specimens of eels, Anguilliformes and needlefishes, while LACM 6202 yielded an extensive fauna of fossil fish. The proposed excavations for the Project would reach a depth of approximately 30 feet below

ground surface and therefore could extend into sedimentary deposits of the fossiliferous Puente Formation and/or older Quaternary alluvium. As a result, the potential to encounter deposits during construction that would be conducive to retaining paleontological resources is considered high. As a result, Mitigation Measures PALEO-1 to PALEO-3 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during Project construction activities are reduced to a less than significant level.

Mitigation Measures

MM PALEO-1 A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older sedimentary deposits from the Puente Formation and/or older Quaternary alluvium. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older sedimentary deposits from the Puente Formation and/or older Quaternary alluvium. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor.

MM PALEO-2 If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources form the Project Site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school, historical society, or other organization in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

MM PALEO-3 The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County,

and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

d. Disturb any human remains, including those interred outside of formal cemeteries.

Less Than Significant Impact With Mitigation Incorporated. The analysis of human remains is based on the cultural resources records search from the SCCIC, a SLF search (requested on April 21, 2016) from the NAHC in Sacramento, and follow-up consultation with Native American groups or individuals. The results of the SLF search and SCCIC records search did not reveal the presence of known human remains from within the Project Site or a half-mile radius. Project notification letters were sent out to the seven (7) Native American contacts identified by the NAHC as being affiliated with the Project Site to request their comments on the Project. As of September 27, 2016, one response letter was received. Specifically, the Soboba Band of Luiseño Indians responded by deferring their comments to the Gabrielino tribes whose traditional territory encompassed the Project Site and surrounding region. No additional comments from the Native American community were received during this initial outreach effort. However, during the City's AB 52 outreach efforts, one additional comment was received. This comment is discussed below in Response No. 5.e under tribal cultural resources. Although the SCCIC search, SLF search and the Native American outreach yielded negative results, this does not preclude the existence of buried human remains that may be encountered during construction. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure HR-1 is prescribed to ensure that potentially significant impacts to previously unknown resources are reduced to a less than significant level. The results of the SLF records search and other Native American consultation documentation are provided in Appendix D of this MND.

Mitigation Measures

MM HR-1 If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable,

taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

e. Cause a substantial adverse change in significance of a tribal cultural resource as defined in Public Resources Code Section 21074?

Less Than Significant Impact With Mitigation Incorporated. The analysis of tribal cultural resources is based on Project notification and request to consult letters that the City submitted to nine (9) Native American individuals and organizations on the City's AB 52 Notification List on May 25, 2016. As of September 27, 2016, the City received one response to these notification letters. Mr. Andrew Salas of the Gabrieleno Band of Mission Indians-Kizh Nation responded with a later dated July 12, 2016. Mr. Salas requested the presence of a Native American monitor during construction given the location of the Project Site in a highly sensitive area for tribal cultural resources. As a result of these findings, Mitigation Measure TCR-1 is prescribed to ensure that potentially significant impacts to previously unknown tribal cultural resources which could be discovered during Project construction activities are reduced to a less than significant level. Mr. Salas' letter and the City's AB 52 project notification and request to consult letters are provided in Appendix D of this MND.

Mitigation Measures

MM TCR-1 The Applicant shall retain a Native American tribal monitor from a Gabrielino group who shall be present during construction excavations (e.g., demolition, clearing/grubbing, grading, and trenching) associated with the Project. The frequency of monitoring shall be determined by the tribal monitor, who shall take into account the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time tribal monitoring may be reduced to part-time inspections if determined adequate by the Native American monitor. If prehistoric archaeological or tribal cultural resources are encountered during construction, the Native American monitor shall advise the Applicant and archaeologist regarding the treatment and curation of the resources as described in MM ARCH-2. As discussed in MM ARCH-2, the archaeological monitor shall have the authority to halt or divert ground-disturbing activities away from the vicinity of the find so that it can be evaluated and a subsequent treatment plan be prepared and implemented. The tribal monitor shall advise the archaeological monitor regarding decisions to halt or divert work from the vicinity of a find.

6. Geology and Soils

The following geology and soils discussion is based, in part, on the technical report for the project entitled, Preliminary Findings Geotechnical Engineering Exploration for 3320-3240 Wilshire Boulevard, (the "Geotechnical Report") prepared by Irvine Geotechnical, dated July 22, 2015. The geotechnical report was prepared to evaluate the nature, distribution, and engineering properties of the earth materials underlying the Project Site with respect to the design and construction of the proposed project. The report is attached herein as Appendix E.

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.

No Impact. A significant impact would occur if the Project would cause personal injury or death or property damage as a result of a fault rupture occurring on the Project Site and if the Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on the information contained in the Los Angeles General Plan Safety Element and the California Department of Conservation's Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Seismic Report 26 (as cited in the Geotechnical Report), the Project Site is not located within a City-designated Fault Rupture Study Area or a State-designated Alquist-Priolo Zone. [21] Therefore, no impacts would occur in this regard.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact would occur if the proposed Project would cause personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Seismic activities associated with a number of nearby faults (e.g., Hollywood, Raymond, Verdugo, Newport-Inglewood, Santa Monica, Sierra Madre, and San Andreas Faults), as well as blind thrust faults (e.g., Elysian Park, Puente Hills, and Compton). Consequently, development of the Project could expose people and structures to strong seismic ground shaking. However, the Project would be designed and constructed in accordance with State and local Building Codes; compliance with these codes over the years has proven to reduce the potential for exposure of people and structures to seismic risks to the maximum extent possible. The Project would 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 (2008), which provides guidance for the evaluation and mitigation

[21] City of Los Angeles, General Plan Safety Element, Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, November 26, 1996.

of earthquake-related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable under current engineering practices. Therefore, impacts related to strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials. As shown in the Los Angeles General Plan Safety Element, potential liquefaction areas are located in the Vermont Avenue/Wilshire Boulevard vicinity just to the east of the Project Site.[22] These extensions correspond with younger alluvial deposits (Qya1, Qya2) shown in the State's Seismic Hazard Zone Report for the Hollywood 7.5-minute Quadrangle (Hazard Zone Report), which also occur near the Project Site.[23] According to Table 1.1 in the Hazard Zone Report, younger alluvial soils such as Qya2 are susceptible to liquefaction. However, designated soils at the Project Site, as shown in Plate 1.1 of the Hazard Zone report are Qoa. These soils are late Pleistocene, dense to very dense, and considered to have unlikely susceptibility to liquefaction.

This is substantiated in the Geotechnical Report, and is based on soil borings and depth to bedrock. The Geotechnical Report determined that on-site soils are dense, over consolidated, and have negligible potential for liquefaction.[24] As such, the potential for liquefaction at the Project Site, and impacts with respect to liquefaction, would be less than significant. No mitigation would be required.

iv. Landslides?

No Impact. The Project Site is located in an area of relative flat topography, with little likelihood of landslides or earthquake-induced landslides. As shown in Plate 2.1 of the State's Landslide Inventory, shown in the Seismic Hazard Zone Report for the Hollywood Quadrangle, the Project Site is not located within a landslide inventory area.[25] In addition, as shown in the City's General

22 City of Los Angeles General Plan Safety Element, Exhibit B, Areas Susceptible to Liquefaction, November 26, 1996.

23 California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Report for the Hollywood 7.5-minute Quadrangle, Los Angeles County, California - Seismic Hazard Zone Report 026, Plate 1.1, 1998.

24 Irvine Geotechnical Inc., Preliminary Findings Geotechnical Engineering Exploration, 322 - 3240 Wilshire Boulevard, page 8, July 22, 2015.

25 California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Report for the Hollywood 7.5-minute Quadrangle, Los Angeles County, California - Seismic Hazard Zone Report 026, Plate 2.1, 1998.

Plan Safety Element, the Project Site is not located within a City-designated landslide area.[26] Further, the Project Site is not located within an area of historically earthquake-induced landslides identified on the Earthquake-Induced Landslides Zones map prepared City of Los Angeles.[27] Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur and no mitigation is required.

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

Less Than Significant Impact. The Project Site is currently developed with the Galleria Building and paved surface parking lot that covers the majority of the Site. There are limited areas of ornamental landscaping within the Project Site. Construction of the Project would include the excavation of two levels of subterranean parking and the export of excess soil. These types of construction activities have the potential to disturb native soils and expose these soils to soil erosion. Furthermore, the change in on-site drainage patterns resulting from the Project could also result in limited soil erosion.

However, Project construction would comply with the requirements of the Municipal National Pollutant Discharge Elimination System (NPDES) Construction Permit and would implement City grading permit regulations that include compliance with erosion control measures, including grading and dust control measures. Specifically, construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, the Project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Prevention Plan (SWPPP). As part of these requirements, Best Management Practices (BMPs) would be implemented during construction to reduce soil erosion to the maximum extent possible. These BMPs would be designed based on the City of Los Angeles Development Best Management Practices Handbook Part A prepared by the Department of Public Works, Bureau of Sanitation. Further, BMPs applicable to dust control and erosion are described under Section 3, *Air Quality*, and Section 9, *Hydrology and Water Quality*, of this MND. Compliance with the City's applicable building regulations regarding erosion control measures and implementation of applicable BMPs would ensure that Project impacts related to soil erosion during the construction phase would be less than significant.

During operation of the Project, the potential for soil erosion to occur within the areas of the Project Site to be developed would be very limited due to the generally level topography, the presence of on and off site drainage facilities, and the limited amount of pervious surfaces. In addition, the Project would not result in a substantial change in the amount of pervious areas on site. The existing Galleria Building would remain in place and the paved parking area would be

[26] City of Los Angeles General Plan Safety Element, Exhibit C, Landslide Inventory & Hillside Area, City of Los Angeles, November 26,1996.

[27] City of Los Angeles, Bureau of Engineering, Department of Public Works, Navigate LA website: http://navigatela.lacity.org/common/mapgallery/index.htm. Earthquake-Induced Landslides Zones Map. September 2006, accessed May 9, 2016.

replaced with new construction, and limited non-paved areas would include landscaping to prevent soil erosion and loss of topsoil. In addition, Standard Urban Stormwater Mitigation Plan (SUSMP) provisions would be implemented throughout the operational life of the Project that would assist in reducing on-site erosion. A SUSMP is a working plan that is systematically reviewed and revised to ensure that BMPs are functioning properly and are effective at treating runoff from the Site for the life of the Project. Section 9, *Hydrology and Water Quality*, of this MND describes the measures to minimize potential erosion impacts during long-term Project operations as part of the SUSMP.

With implementation of the applicable erosion control mitigation and conformance with the City Building Code, including implementation of an erosion control plan, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant.

c. Be located on a geological 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. Impacts related to liquefaction and landslides are addressed above in Response Nos. 6.a.iii and 6.a.iv, respectively. Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When the water is withdrawn the sediments collapse in on themselves. Based upon the criteria set forth by the City's *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.[28] For the purpose of this specific issue, a significant impact may occur if the Project were to be 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. According to the preliminary geotechnical study, including five boring samples, Project Site soils generally are comprised of older alluvium and/or bedrock, which would be suitable for construction. However, the Geotechnical Report found that existing fill is not suitable for foundation or slab support.[29] Therefore, any unconsolidated fill materials would have to be removed or compacted, as required by the City of Los Angeles Uniform Building Code standards. Compliance with the Building Code would ensure that any potential impacts from lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

[28] *L*.A. CEQA Thresholds Guide, Chapter E.1, page E.1-4, 2006.

[29] *I*rvine Geotechnical Inc., Preliminary Findings Geotechnical Engineering Exploration, 322 - 3240 Wilshire Boulevard, page 9, July 22, 2015.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating a substantial risk to life or property?

Less Than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. As stated in the Geotechnical Report, the borings performed on-site revealed that Project Site soils consist primarily of very dense alluvial, silty sand, siltstone, sand with clay binder, and layers of siltstone and shale, which can be characterized as having low potential for expansion. Therefore, impacts related to substantial risk to life or property as a result of expansive soils would be less than significant.

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?

No Impact. The Project Site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative waste disposal systems. Therefore, no impact would occur and no mitigation measures are required.

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?

Less Than Significant Impact. State regulated greenhouse gases include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). CO_2 is the most abundant greenhouse gas (GHG) in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO_2, denoted as CO_2e. Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project related CO_2e emissions can be tabulated in metric tons (MT) per year.

Neither the City of Los Angeles nor the SCAQMD have adopted a numerical significance threshold for assessing impacts related to GHG emissions, and the City of Los Angeles has not formally adopted a local plan for reducing GHG emission. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of

GHGs. Consistent with developing practice, this Guideline section urges lead agencies to quantify GHG emissions of projects where possible. In addition to quantification, this section recommends consideration of qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15130(f)).[30]

When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.[31] In its January 2008 *CEQA and Climate Change* white paper, the California Air Pollution Control Officers Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The SCAQMD released draft guidance regarding interim CEQA GHG thresholds of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. "Tier 3," the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level that captures 90 percent of Air Basin-wide land use GHG emissions. The SCAQMD proposed a screening level of 3,000 MT of CO_2e per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors."[32] In CAPCOA's January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the "objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to

30 See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, S

31 See Protect Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal. App. 4th 1099, 1107 ["'[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution."'"]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., Cadiz Land Co. v. Rail Cycle (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

32 South Coast Air Quality Management District, Board Meeting, December 5, 2008, Agenda No. 31, Interim GHG Significance Threshold Proposal – Key Issues/Comments Attachment D.

accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions."[33] A 90 percent capture rate would "exclude the smallest proposed developments from potentially burdensome requirements … to mitigate GHG emissions."[34] The SCAQMD's proposed screening level of 3,000 $MTCO_2e$ per year is a South Coast Air Basin-specific level that would meet CAPCOA's intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance threshold of 10,000 $MTCO_2e$ per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this Project, the significance of the Project is evaluated based on the SCAQMD's proposed screening level of 3,000 $MTCO_2e$.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increase in the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO_2e metric, the GWP ratios corresponding to the global warming potential of CO_2 over a 100-year period is used in this analysis.

The Project's net increase in GHG emissions is estimated using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[35]

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2013.2.2) software is based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the California Air Resources Board (CARB) and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on

33 California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 42-43.
34 California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 43-44.
35 See http://www.caleemod.com.

equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see Section 3, *Air Quality*, in this Attachment B) to generate GHG emissions values for each construction year. CalEEMod outputs construction-related GHG emissions of CO_2, CH_4, N_2O, and CO_2e. These values are then converted to metric tons for consistency. The CO_2e emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions from Project construction and operation. In order to consider Project construction GHG emission in the larger operational context, GHG emissions from construction have been amortized over a 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions) consistent with SCAQMD recommendations.

Operational emissions were estimated using CalEEMod for the existing site uses and the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing site and Project trips, trip generation rates provided in the Project traffic study were used.[36] The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. Reductions in VMT are calculated based on site-specific characteristics, such as increased job and housing density on the site and proximity to regional job centers, using the equations and methods prescribed in the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures based on the setting of a project.[37] The Project area is characterized as an urban setting, which has a high potential for reductions in VMT, and meets the urban setting characteristics with respect to typical building heights of six stories or higher, grid street pattern, minimal setbacks, constrained parking, high parking prices, high quality rail service (i.e., Metro Red Line), location relative to regional cores (5 miles or less) and jobs/housing balance.

The estimated reduction in VMT for the existing site uses and Project uses is credible as evidenced by data in the *Health Atlas for the City of Los Angeles* (Health Atlas), published by the City in June 2013.[38] While the primary focus of the Health Atlas is on factors that affect the health behaviors and health status of residents and workers, much of the data is relevant to land use GHG emissions as they often share underlying sources associated with land use patterns, urban design, and transportation systems. The Project Site is located in the Wilshire Community Plan Area (CPA). According to the Health Atlas, the Wilshire CPA has the third highest land use mix and land use diversity of the 35 CPAs in the City of Los Angeles (higher than the West Los Angeles CPA but less than the Westlake CPA), which increases walking and other physical activity and offers more destinations for non-automobile trips.[39] The Health Atlas also shows that the Wilshire CPA has the sixth highest employment density of the 35 CPAs in the City

[36] Overland Traffic Consultants, Inc., Traffic Impact Analysis for Wilshire Mixed Use Project, June 2016.
[37] California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).
[38] City of Los Angeles, Health Atlas for the City of Los Angeles, (2013).
[39] City of Los Angeles, Health Atlas for the City of Los Angeles, (2013) 86-87.

(higher than the Westchester-Playa del Rey CPA but less than the Central City North CPA) with approximately 8,700 jobs per square mile. The Citywide average employee density is approximately 1,185 jobs per square mile.[40] The Health Atlas recognizes that "[h]igher levels of employment density, particularly retail job densities, are associated with more walking trips" as they "allow for more frequent and comprehensive transit service."[41] In turn, "[d]enser employment districts which are rich in transit service typically result in more walking and transit use … and makes jobs more accessible to all residents."[42] Furthermore, the Health Atlas indicates that the Wilshire CPA has the eighth highest percentage of workers that commute to work by walking, biking, and public transportation at about 23 percent for the area as a whole based on 2010 data (higher than the Hollywood CPA but less than the Southeast Los Angeles CPA). The statewide average percentage of workers that commute to work by walking, biking, and public transportation is approximately 9 percent based on census data for the 2010 to 2014 period.[43] Thus, given the close proximity of Project site to existing high-quality transit and to a diverse mix of land uses, and the highly walkable environment within the Wilshire CPA, the expected level of VMT reduction associated with the Project is credible and supported by substantial evidence.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and Project land uses, as well as estimated water supply needs. Energy usage (off-site electricity generation and on-site natural gas consumption) for the Project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[44] Since the data from the CEUS is from 2002, the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. This assessment also includes electricity-related GHG emissions from the proposed enclosed parking structure, which includes elevators, lighting, and a ventilation system. The energy use from residential land uses is calculated based on the CEC Residential Appliance Saturation Survey (RASS), which also incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The existing site uses were modeled using historical energy factors based on previous Title 24 standards. The Project's residential uses would not include wood-burning or natural gas-fueled fireplaces (see PDF-AIR-2 in Section 3, Air Quality) and would not generate emissions associated with the combustion of wood or fossil fuels in fireplaces.

Water and wastewater generated from the existing site and Project requires energy to supply, distribute and treat. The CalEEMod software uses the electrical intensity factors from the 2006

40 City of Los Angeles, Health Atlas for the City of Los Angeles, (2013) 102.
41 City of Los Angeles, Health Atlas for the City of Los Angeles, (2013) 90.
42 City of Los Angeles, Health Atlas for the City of Los Angeles, (2013) 90.
43 U.S. Census Bureau, American FactFinder, Data Set B08301 (Means of Transportation to Work, California, 2010-2014), http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t. Accessed December 2015.
44 California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed December 2013.

CEC report *Refining Estimates of Water-Related Energy Use in California*.[45] The emissions of GHGs associated with the wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A.*[46]

Emissions from solid waste handling generated from the existing site and Project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH_4, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[47] The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin.

Emissions calculations for the Project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy and water demand from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements.

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. Results of the GHG emissions calculations are presented on **Table B-7**, *Estimated Unmitigated Construction Greenhouse Gas Emissions*. The maximum annualized GHG emissions for the existing site and Project (including Project construction amortized over 30 years) are shown in **Table B-8**, *Estimated Project Annual Greenhouse Gas Emissions*. Detailed VMT reduction calculations and GHG emissions estimates for the existing site and Project are provided in Appendix F. The emissions analysis is considered to be conservative because it does not quantitatively account for certain Project sustainability design features that would reduce the Project's contribution to the urban heat island effect, such as incorporating new substantial landscaping and vegetation on the Galleria building rooftop as well as vegetation on the mid-rise and high-rise buildings. While the GHG emission benefits of these sustainability design features cannot readily be quantified, they are recognized as features that reduce global climate change effects and contribute to GHG emissions reductions. However, the analysis does include PDF-1 and PDF-2 (see below). PDF-1 indicates the Project would be designed to optimize energy performance and reduce building energy cost by a minimum of five (5) percent compared to the Title 24 (2016) Building Standards Code. PDF-2 indicates the parking structure would be

[45] California Energy Commission, Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report, CEC-500-2006-118, (2006).
[46] California Air Pollution Control Officers Association, California Emissions Estimator Model User's Guide, (2013).
[47] California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003), http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_ act.pdf. Accessed November 2013.

designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones.

TABLE B-7
ESTIMATED UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Emissions Source	CO_2e (metric tons) [a]
Construction Year 1	805
Construction Year 2	809
Construction Year 3	732
Total	**2,345**
Annual (Amortized over 30 years)	**78**

[a] Totals may not add up exactly due to rounding in the modeling calculations

SOURCE: ESA PCR, 2016

TABLE B-8
ESTIMATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS

	Existing Site	Project
Emissions Source	**CO_2e (metric tons) [a]**	**CO_2e (metric tons) [a]**
Construction (Amortized)	—	78
On-Road Mobile	2,050	4,141
Area	<1	9
Electricity	1,256	1,863
Natural Gas	356	386
Water and Wastewater	106	229
Solid Waste	14	52
Total	**3,782**	**6,758**
Project Net Total	—	**2,976**
Significance Threshold	—	**3,000**
Over/(Under)	—	**(24)**
Exceeds Threshold?	—	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations

SOURCE: ESA PCR, 2016

As shown in Table B-8, the incremental net change in Project GHG emissions would not exceed the SCAQMD Tier 3 annual mass emission threshold of 3,000 $MTCO_2e$. As a result, the Project would have a less than significant impact with respect to construction and operational GHG

emissions. To further GHG emissions, mitigation measure GHG-1 is prescribed to require the use of low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels during the construction of the Project to the maximum extent practicable.

Project Design Features

PDF GHG-1 The Project would be designed to optimize energy performance and reduce building energy cost by a minimum of five (5) percent compared to the Title 24 (2016) Building Standards Code.

PDF GHG-2 The parking structure would be designed with occupancy-sensor controlled lighting that would place lighting fixtures in a low power state in unoccupied zones. A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls.[48] For the purposes of this assessment, compliance with this feature is assumed to achieve a minimum 50 percent reduction in the energy required for parking structure lighting.

Mitigation Measures

MM GHG-1 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.

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

Less Than Significant Impact. The Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32, requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To achieve these goals, the CARB has established an emissions cap and developed a Climate Change Scoping Plan to identify mandatory strategies for reducing statewide GHG emissions. In addition, the California Climate Action Team (CAT) was formed which consists of members of various state agencies tasked with identifying strategies to reduce GHG emissions. Several other bills have been passed as a companion to AB 32 which include Senate Bill (SB) 1368 (electricity generation standards), SB 97 (CEQA analysis for GHGs), Low Carbon Fuel Standards, SB 375 (Regional Transportation Planning and GHG emissions), CALGreen building standards and others plans to achieve the goals of AB 32. Since AB 32 sets statewide targets for future GHG emissions, the Scoping Plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors.

[48] United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013.

The State has promulgated regulations and programs for the purpose of reducing GHG emissions. The GHG emissions analysis in this MND was performed in accordance with SCAQMD and CARB guidance developed in compliance with, and as a result of, those regulations and programs to ensure that new development complies with those same regulations and programs. The result of the analysis of the project's potential impacts in terms of GHG and global climate change indicates that the construction-related GHG emissions from the Project alone would not be expected to cause a direct physical change in the environment. Therefore, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

According to CARB in its First Update to the Climate Change Scoping Plan, infill development that offers a mix of uses can reduce dependence on motor vehicles, thus reducing associated GHG emissions.[49] Thus, the Project would be consistent with reducing GHG emissions via infill development strategies in close proximity to public transportation and other nearby off-site land uses.

In support of AB 32, the State has promulgated laws and strategies aimed at reducing GHG emissions, some of which are applicable to the Project. Consistent with AB 32, the Project would minimize construction-related GHG emissions by using equipment that meet stringent USEPA emissions standards, using low carbon vehicle fuels as required under state law, and prohibiting diesel-fueled commercial motor vehicle idling consistent with CARB requirements.

The Project would be consistent with GHG reduction measures from applicable plans. **Table B-9**, *Project Consistency with Applicable GHG Reduction Strategies*, contains a list of other state, regional, and local GHG-reduction strategies applicable to the project, the identified related projects, and future development similar in scope and location. Included are the regulations or guidelines from which the strategies were developed. The Project-level analysis highlights the manner by which the Project intends to meet the applicable strategies. Because the Project would not conflict with strategies to reduce GHG emissions, it would be consistent with the overarching regulation to reduce GHG emissions and impacts would be less than significant.

TABLE B-9
PROJECT CONSISTENCY WITH APPLICABLE GHG REDUCTION STRATEGIES

Strategy	Description	Demonstration of Project Consistency
AB 1493	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020	**Consistent.** This measure applies to all new vehicles and the project would not conflict with its implementation.

[49] California Air Resources Board, First Update to the Climate Change Scoping Plan, (2014) 104.

Strategy	Description	Demonstration of Project Consistency
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** Los Angeles Department of Water and Power provided power is subject to the performance standards. The project would not conflict with the implementation of this measure.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with the implementation of this measure. Construction and operational vehicles association with the project would utilize low carbon transportation fuels as required under this measure.
CALGREEN Requirements	Comply with applicable site development planning and design measures such as bicycle parking and light pollution reduction.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Comply with indoor water usage requirements by using low-flow water fixtures that meet the prescribed flow rates (residential and non-residential) or reduce water use by 20 percent from the water use baseline (non-residential).	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Comply with material conservation and resource efficiency measures including applicable weather resistance and moisture management measures.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Comply with VOC emissions limits for carpet systems, composite wood products, and flooring.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project is committed to implementing this action to the extent feasible. Construction trucks would comply with CARB's anti-idling measure.
Climate Action Team	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** The CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Project would provide appropriate landscaping on the Project site including vegetation and trees.

Strategy	Description	Demonstration of Project Consistency
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements. Mitigation measure GHG-1 would further reduce the Project's energy demand.
	Apply strategies that integrate transportation and land use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would be located in an infill location in proximity to existing residential and commercial businesses, which would minimize trip lengths and associated emissions.
City of Los Angeles LA Green Plan	Make transit information easily available and understandable in multiple languages.	**Consistent.** The Project would provide on-site residents and hotel guests with transit information as part of the Project's effort to reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Promote walking and biking to work.	**Consistent.** The Project would meet or exceed this requirement as part of the incorporated physical and operational project characteristics to reduce vehicle trips and VMT and encourage alternative modes of transportation for residents, hotel guests, and employees. Bicycle parking would be provided pursuant to City ordinance.
	Reduce or recycle 70 percent of trash by 2015.	**Consistent.** The Project would provide areas for the collection of recyclable materials on the project site. The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.

Source: ESA PCR, 2016

The Project's estimated VMT reductions due to its urban infill location within a TPA would be consistent with regional plans to reduce GHG emissions. As discussed previously, the Project area is characterized as an urban setting, which has a high potential for reductions in VMT according to the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*.[50] The Project would be consistent with and would support the goals and benefits of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them."[51] According to SCAG, incorporating "smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand" and associated pollutants.[52] Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where they can live and work that include a pleasant and convenient walking environment that reduces their reliance on their car."[53] The high scores for walkability and number of destinations available for non-motorized trips within the Wilshire CPA (as demonstrated by data from the City's Health Atlas) shows that the infrastructure and built environment exists such that projects located in the area would be expected to achieve substantial and credible reductions in trip distances and overall VMT. The high employment density of the Wilshire CPA is evidence that projects located in the area would provide high levels of walkability and high potential for transit usage by project residents, employees, and visitors. The high level of workers that commute to work by walking, biking, and public transportation in the Wilshire CPA is additional evidence that projects located in the area would provide access to more transportation choices for project residents, employees, and visitors and that projects would have a substantially greater level of transportation efficiency when compared to the Citywide and statewide average. As a result, the Project would be consistent with the SCAG RTP/SCS goals and benefits to improve mobility and access to diverse destinations, to provide better "placemaking," to provide more transportation choices, and to reduce vehicular demand and associated emissions. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions and impacts would be less than significant.

The State of California has established goals to reduce GHG emissions to 40 below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. These goals have not been codified into law by the Legislature. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its *Climate Change Scoping Plan*, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[54] In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity

50 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).
51 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 113.
52 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 39.
53 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 112.
54 CARB, Climate Change Scoping Plan, p. 117, December 2008.

changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[55] Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Project's impacts further relative to the 2030 and 2050 goals currently is speculative for purposes of CEQA. Moreover, CARB has not calculated and released the future emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA Project's consistency with these targets. Although the Project's emissions levels in 2030 and 2050 cannot yet be reliably quantified, statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

8. Hazards and Hazardous Materials

The following hazardous materials discussion is based, in part, on the *Environmental Site Assessment – Phase 1: Commercial Property 3240 Wilshire Boulevard* (Phase 1 ESA), prepared by California Environmental Geologists & Engineers, dated July 2015. The Phase 1 ESA was prepared in accordance with the "Standard Practice for Environmental Site Assessment Process," issued by the American Society for Testing and Materials (ASTM Standard E1527-00). The Phase I ESA, which is attached herein as Appendix G, was conducted to evaluate the presence of known or suspected hazardous materials or wastes on the Project Site, which may have the potential to adversely impact the Site's environmental integrity. The main objective of the Phase I ESA was to identify the presence, or likely presence, use, or release of hazardous material impacts to the soil and groundwater beneath the property. Such threats or material threats are identified as "recognized environmental conditions" (RECs).

Also, a *Limited Lead Investigation Report for Renovation*, and an *Asbestos Survey*, were prepared by T&T Environmental in July 2015. These reports are also included in Appendix G.

Would the project:

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

Less Than Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing

[55] CARB, First Update, p. 32, May 2014.

materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable Federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site.

As discussed in detail under Response No. 8.b, below, the Phase I ESA revealed the potential presence of poly-chlorinated biphenyl's (PCBs) in the Galleria Building. Also, the lead-based paint (LBP) and asbestos-containing materials (ACMs) surveys revealed the presence of these materials in the Galleria Building. Accordingly, Mitigation Measures HAZ-1 to HAZ-3 are provided below to require comprehensive surveys of the Galleria Building prior to renovation activities in accordance with applicable regulations to verify the presence or absence of any of these materials. If LBPs, ACMs and/or PCBs are encountered, the prescribed mitigation measures require removal, remediation or abatement of these materials in accordance with all applicable regulations and standards. Adherence with these measures have been proven to, and would, reduce risks associated with LBPs, ACMs and PCBs to acceptable levels, and associated impacts would be less than significant.

Operation of the residential, hotel, and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

Less Than Significant Impact. As noted above, the Project would not involve the routine use, storage, transport, or disposal of notable quantities of hazardous materials. Hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In addition, as discussed in Response No. 8.d, below, the Project Site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, operation of the Project would not create a significant risk of exposure to hazardous materials towards the public or the environment.

Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to on-site workers or off-site residents would result from temporary construction activities. However, short-term construction activities, including renovation activities to the Galleria Building or excavation activities, could expose construction workers or

the public to unknown hazardous materials in Site soil and/or groundwater should such materials be present. The Phase I ESA prepared for the Project identified the following items of potential environmental concern:

Above Ground Storage Tank

An existing 1,000-gallon above ground diesel storage tank (AST) is located in the basement of the Galleria Building. The AST is for storage of fuel for the emergency generator also located in the basement. The AST is provided with a steel secondary containment cell and no evidence of a fuel release was observed at the time of the Site was inspected. Also, the records search for potential spills or leaks associated with the Project Site revealed no such circumstances associated with the AST. Thus, the AST was concluded by the Phase I ESA to not present a REC for the Project Site.

Asbestos Containing Materials

Per the Asbestos Survey, the Galleria Building has been determined to contain asbestos-containing materials (ACMs), which could pose a threat to human safety during demolition and renovation. Samples of potential ACMs were collected in general accordance with applicable EPA random sampling protocol. Based on EPA and Federal OSHA standards, all materials containing more than one percent asbestos are considered ACMs. The field survey and laboratory testing of 72 examples from representative areas in the Galleria Building determined the presence ACMs in floor tile and mastics under carpet in Suite 501 (an approximately 4,950-square-foot area). The floor tile is considered non-friable and in good condition. However, only portions of the Galleria Building were sampled due to occupied spaces and further sampling will be required. The removal and disposal of ACMs and protection of workers and employees would be subject to SCAQMD, Cal/OSHA, and DTSC requirements to ensure proper handling, notification, and monitoring. The SCAQMD regulates the removal of asbestos through Rule 1403. Compliance with existing regulations would ensure that impacts associated with ACM removal and handling would be less than significant.

Lead-Based Paint

Because of the date of the construction of the Galleria Building prior to 1977, the Limited Lead Investigation Report was performed to determine the potential presence of lead materials or paints within the Galleria Building. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Lead-based paint is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil. Testing of exterior and interior samples was taken on representative surfaces and within interior rooms of the Galleria Building. Lead-contaminated paints were detected in exterior metal windows and frames, exterior walls and columns, and interior window frames (rear entry only).[56] To ensure proper handling, notification, and monitoring, the removal and disposal of such materials and the protection of workers and employees would be subject to applicable

[56] The HUD definition of lead contamination is lead equal or greater than 1.0 mg/cm2.

State regulations, including Cal/OSHA and California Department of Public Health requirements. Compliance with applicable regulations would ensure that impacts associated with LBP removal and handling would be less than significant.

PCBs

Due to the date of construction of the Galleria Building (prior to the 1940s), fluorescent light fixtures in the Galleria building manufactured prior to 1977 (and fluorescent light fixtures without a date of manufacture) may have ballasts capacitors that contain PCBs, which is recognized by the Federal EPA as a suspect carcinogen. Thus, during renovation activities, the removal of PCB-contaminated items could pose a threat to human safety. Used fluorescent lamp tubes are considered to be hazardous mercury-bearing waste requiring proper disposal in accordance with local, State, and Federal requirements. Fluorescent light ballast labels that do not include the statement "No PCBs" would be disposed of as PCB containing waste. In addition, electrical panels and related equipment would be inspected prior to disposal to determine if they contain PCBs. The removal and disposal of such materials would be subject to Cal/OSHA and applicable State regulations and performed by a licensed contractor. Typically during construction, a licensed contractor would dismantle the fixtures and panel boards and package them for recycling and disposal consistent with existing applicable Title 8 and 22 regulations. Compliance with applicable regulations would ensure that impacts associated with LBP removal and handling would be less than significant.

Methane

The Project Site has been identified by the City of Los Angeles Department of Building and Safety to be within a "Methane Zone." These areas have a risk of methane intrusion emanating from geologic formations. Due to the potential environmental risk associated with construction in a Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles. Development would occur per the provisions of the City of Los Angeles Building Code, Chapter 71, which pertains to construction requirements for these areas. Per Chapter 71, the Applicant would be required to conduct a methane assessment prior to the redevelopment of the Project Site. As part of the Project design, the Project buildings would be required to have adequate ventilation as defined in Section 91.7102 of the Municipal Code, which requires that a gas-detection system be installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations. Compliance with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment, with impacts being less than significant.

Radon Gas

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the table below:

EPA RADON ZONES

EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	*Exceed 4.0 pCi/L*	*Highest*
Zone 2	*Between 2.0 and 4.0 pCi/L*	*Moderate*
Zone 3	*Less than 2.0 pCi/L*	*Low*

It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of the Phase I ESA. However, review of the US EPA Map of Radon Zones places the Project Site in Zone 2, which is below 4 picoCurie per Liter (pCi/L), Federal Action level. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

RECs

The Phase 1 ESA also evaluated the presence of Historical Recognized Environmental Conditions (HRECs) and Controlled Recognized Environmental Conditions (CRECs) through a Site reconnaissance, research of land use records and other sources for preliminary indications of hazardous material use, storage, or disposal at the property and/or on contiguous parcels. As determined in the report, the Project Site is listed in the HAZNET database for generation of medical waste associated with an existing, on-site dental office. No other on-site locations are identified as local, State, or Federal environmental risk sites. With the implementation of the Project, the dental office and other businesses in the existing Galleria Building would be vacated. Remnant conditions from the dental office would be minor and any release of hazardous materials into the environment would be less than significant.

The nearest, off-site environmental concern site is located approximately 50 feet to the south of the Project Site. This facility is identified in the Phase I ESA as a former gas station fuel release site at 703 Vermont Avenue. The Vermont Avenue property underwent remediation for the fuel release and was issued case closure by the Los Angeles Regional Water Quality Control Board (LARWQCB) in July 2013. Monitoring wells, 10-15 feet below ground surface (bgs), were placed at the remediated site. Water quality data from those wells shows no evidence of contamination. As discussed in the Phase 1 ESA, the groundwater flows from Vermont Avenue toward the southwest and away from the Project Site. Another release site is located to the north at 3201 Wilshire Boulevard. An underground storage tank (UST) release was assessed and case closure was issued in 2011. According to the Phase 1 ESA, the groundwater (20-25 feet bgs) flow direction was estimated to be toward the northeast, away from the Project Site. Because groundwater flows from both off-site releases are away from the Project Site, these are considered to have minimal risk to the Project Site. As such, impacts related to the accidental release of hazardous materials on- and off-site hazardous environmental conditions are also considered to be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The nearest schools to the Project Site are the Young Oak Kim Academy Middle School at 615 Shatto Place (0.14 mile to the northwest) and the campus for the RFK Community Schools, a complex of public schools at 701 S. Catalina Street (0.18 mile to the west). Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. As discussed in Response 8.b, the property is listed in the HAZNET database for generation of medical waste associated with an on-site dental office. However, removal of the dental facility would not result in hazardous emissions or materials impacts to any schools. No other on-site environmental conditions are identified in the Federal, State, or local lists that would cause hazardous emissions or risk to nearby schools. The reuse of the Galleria Building and development of the proposed residential, hotel, and commercial uses would not cause hazardous substance emissions or generate hazardous waste. The types of hazardous materials to be used in association with the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.

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

Less Than Significant Impact. As discussed in Response 8.b, the Project Site is listed in the HAZNET database for generation of medical waste associated with an on-site dental office. The reuse of the Galleria Building would remove the dental office and the source of potentially hazardous materials. No RECs were identified for the Project Site in the Phase I ESA. Besides being listed in the HAZNET database, the Project Site is not identified in Federal, State, or local database indicating the Site is subject to hazardous materials impacts. Therefore, impacts with respect to hazardous materials lists would be less than significant.

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

No Impact (e and f). The Project Site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately three and five miles from the Project Site, respectively. Therefore, the Project would not result in an airport-related safety hazard for people residing or working in the Project area, and no impact would occur in this regard.

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

Less Than Significant Impact With Mitigation Incorporated. The Project Site is located in an established urban area that is well served by a roadway network. As shown the City of Los Angeles Safety Element, Critical Facilities and Lifeline Systems, Wilshire Boulevard to the west of Western Avenue is a Selected Disaster Route that could be utilized during a disaster event.[57] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. It is not expected that construction traffic generated by the Project would adversely affect Wilshire to the west of Western Avenue (approximately 0.9 mile to the west). In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. The Project would also implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access along Wilshire Boulevard. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided as under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD).

Nonetheless, Mitigation Measure HAZ-1 is prescribed that requires preparation of an emergency response plan in consultation with the Fire Department. Implementation of the prescribed mitigation would ensure the Project does not cause significant impediments along a designated emergency evacuation routes, or impair implementation of the City's emergency response plan. Thus, with the prescribed mitigation, the Project would have a less than significant impact with respect to this issue.

[57] City of Los Angeles General Plan Safety Element Exhibit H, Critical Facilities and Lifeline Systems, November *26*, 1996.

Mitigation Measures

HAZ-1 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. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is highly urbanized and does not contain wildland features. In addition, the Project Site is not located adjacent to any wildland areas. Therefore, development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impacts would occur in this regard.

9. Hydrology and Water Quality

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The approximately 2.14-acre Project Site is currently developed with the Wilshire Galleria Building, a paved surface parking lot, and limited areas of landscaping. The approximate slope of the property is 2 percent. Under existing conditions, runoff drains to the west and south into curbs and gutters in New Hampshire Avenue and 7th Street. Stormwater draining from the northerly and westerly portion of the Site enters a City of Los Angeles catch basin on the southeast side of New Hampshire Avenue and Wilshire Boulevard that connects via a storm drain lateral to a 12-inch storm drain main line in Wilshire Boulevard. Stormwater draining from the southeast portion of the Site enters a City of Los Angeles catch basin at the northeast corner of 7th Street and Vermont Avenue that connects via a 12-inch storm drain lateral to a 20-inch storm drain main line in Vermont Avenue.

Construction of the Project would require earthwork activities, including excavation for subterranean garages and grading of the Site. During precipitation events in particular, construction activities associated with the Project have the potential to result in soil erosion during grading and soil stockpiling, subsequent siltation, and conveyance of other pollutants into municipal storm drains. However, Project construction would comply with the requirements of the Municipal NPDES Construction Permit and would implement City grading permit regulations that include compliance with erosion control measures, including grading and dust control measures. Specifically, construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan, as well as a SWPPP, by the City of Los Angeles Department of Building and Safety. As part of these requirements, BMPs would be implemented during construction to reduce soil

erosion to the maximum extent possible. These BMPs would be designed based on the *City of Los Angeles Development Best Management Practices Handbook Part A*, prepared by the Department of Public Works, Bureau of Sanitation. Typical BMPs include, but are not limited to: disposing of construction waste in appropriately labeled recycling bins; timely and proper clean-up activities of leaks, drips, and spills; proper covering and maintenance of dumpsters; use of grave approaches where feasible; and conducting vehicle/equipment maintenance, repair, and washing away from storm drains. Since the Project would be required to prepare a SWPPP in compliance with applicable regulatory requirements, impacts to water quality during Project construction would be less than significant.

For any grading projects occurring during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) is required pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works (BPW). The WWECP addresses water pollution control from grading activities during the wet weather season by specifying the use of appropriate temporary erosion and sediment control BMPs. Compliance with the City requirement to prepare a WWECP would ensure that impacts to water quality during the rainy season would be less than significant.

Additional BMPs would be designed or installed for the operational phase of the Project to comply with the NPDES General Permit and the City of Los Angeles' Standard Urban Stormwater Mitigation Plan (SUSMP) to reduce the discharge of polluted runoff from the Site. Specifically, operational BMPs to be implemented may include screened or walled trash container areas, stenciling of on-site storm drain inlets, covered and properly drained loading dock areas, and infiltration and treatment systems in parking areas to prevent pollutant runoff. Project applicants are also required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs would be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. The final section of BMPs would be completed through coordination with the City of Los Angeles. Compliance with the applicable stormwater regulatory requirements, including preparation of a SUSMP would ensure impacts to water quality during Project operation would be less than significant.

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)?

Less Than Significant Impact. The Wilshire District and the Project Site are located in the northern edge of the Forebay Area of the Central Groundwater Basin of the Los Angeles Coastal Plain. The Basin is bordered on the north by the Santa Monica Mountains and to the north and east by the Elysian Hills. Groundwater within the Basin occurs in recent and Pleistocene

sediments, which are frequently near the ground surface. In the Project area, depth to groundwater data obtained from nearby monitoring wells indicate depths of 20-25 bgs in 2010 in wells located to the north of the Project Site across Wilshire Boulevard, with a flow direction to the northeast. Wells located to the south of the Site across 7th Street contained groundwater at a depth of 10-15feet in 2013 with a flow toward the southwest. [58]

During excavation for the subterranean garage, it is possible that excavation activities could encounter the groundwater table. If this occurs, dewatering to reduce intrusion of the groundwater into the excavation would be required. All dewatering-related activities would occur in accordance with the LARWQCB and City regulations to ensure that construction activities would not substantially deplete groundwater supplies.

During operation, depending on the determined depth to the water table, which changes according to weather and climactic conditions, existing building regulations would require sealants and possible installation of a permanent dewatering system for the subterranean garage. Any dewatering system would be conducted under the NPDES permit from the LARWQCB, which would ensure that groundwater supplies would not be adversely affected.[59] The LARWQCB permit may require recharge if the withdrawn water meets specific water quality standards. In addition, any dewatering activities would be minor in relation to the scale of the general water table. Implementation of the LARWQCB permit, which requires monitoring and reporting, would ensure that dewatering would be conducted in accordance with local and State regulations and that a substantial net deficit in the aquifer volume or lowering of the local groundwater table would not occur.

The existing impervious area for the Project Site is approximately 93 percent. The impervious area under the Project would be approximately 88 percent. As such, the Project would increase the potential for groundwater recharge. Because the amount of impervious surface area on the Project Site would not be reduced, the proposed buildings and paved surfaces would not substantially deplete groundwater supplies nor interfere with groundwater recharge. With implementation of LARWQCB requirements, including those described under Response No. 9.a, above, impacts with respect to the depletion of the groundwater table would be less than significant.

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

No Impact. Existing Site drainage conditions are described under Response No. 9.a, above. The Site's existing impervious area is approximately 1.99 acre or 93 percent of the Site. The approximate impervious area under the Project would be 1.89 acre or 88 percent of the Site, resulting in a negligible change in stormwater runoff. The existing Site runoff for a 50-year

[58] California Geologists and Engineers, Phase I Environmental Site Assessment, pages 11 and 12, July 2015.
[59] Los Angeles RWQCB Order No. R4-2013-00 establishes standards for monitoring discharges of groundwater from construction and project operation.

storm event is 6.1 cubic feet per second (cfs). Because of the small amount of incremental reduction of impervious area, the amount of runoff would be generally similar at 6.1 cfs.[60]

Stormwater would be collected through roof and on-site drains then directed to infiltration wells or filtration (SUSMP) planters. The overflow would be directed to the existing gutter system through parkway drains. The use of infiltration wells and/or SUSMP planters would meet City of Los Angeles Low Impact Development (LID) standards.

Thus, existing drainage patterns would be maintained and stormwater runoff incrementally reduced. With the Site entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Project construction would comply with applicable NPDES and City requirements including those regarding preparation of a SWPPP and SUSMP. As such, no impacts associated with alterations to existing drainage patterns would occur with Project implementation.

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 off site?

No Impact. As discussed in Response No. 9.c, the Project would reduce the amount of impervious surface area on the Site and, thus, would not result in substantial increases in surface water runoff quantities. With implementation of the Project, existing drainage patterns would be maintained, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Furthermore, the Project would not alter the course of the nearest stream or river (the Los Angeles River, more than three miles to the east of the Site). Thus, Project implementation would not result in a substantial increase in the rate or amount of surface water runoff that would result in flooding on- or off-site. Because existing drainage patterns would not be altered, the Project would result in no impact with respect to the alteration of existing drainage patterns.

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?

Less Than Significant Impact. As discussed above, the Project would increase the Site's permeability and would, thus, decrease surface water runoff. No capacity issues currently exist in the existing catch basin at New Hampshire Avenue and Wilshire Boulevard and 7th Street and Vermont Avenue, or with the storm drain lateral in Wilshire Boulevard or main line in Vermont Avenue. In addition, the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. Similar to existing conditions, operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to

[60] Psomas, May 5, 2016. Memo, "3240 Wilshire Blvd., Los Angeles CA – Hydrology". See Appendix H of this MND.

surface water runoff. However, required water quality control measures would be implemented as described in Response No. 9.a, above. Therefore, 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.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed above, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the project as detailed in a SWPPP and SUSMP. Compliance with these requirements would ensure that construction and operation of the Project would not substantially degrade water quality. Impacts would be less than significant.

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?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain.[61] As such, Project development would not place housing within a 100-year flood plain. No impact would occur in this regard.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. The Project Site is not located with a 100-Year or 500-Year flood plain, and as such, would not place structures within a 100-year flood plain or cause impediment or redirection of flood flows. No impact would occur in this regard.

i. 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. The Project Site is not located with a 100-Year or 500-Year flood plain. Also, according to the City of Los Angeles General Plan Safety Element, the Project Site is not located within an inundation area associated with the failure of a levee or dam.[62] As such, no impacts associated with the exposure of people or structures to a significant risk of loss, injury, or death involving flooding would occur under the Project.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic

61 City of Los Angeles General Plan, Safety Element Exhibit F, 100-Year & 500-Year Floodplains, March 1994.
62 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

displacement of the sea floor associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located more than 12 miles east of the Pacific Ocean and is not shown to be located within a tsunami hazard area in the Los Angeles General Plan Safety Element.[63] In addition, the Project Site is not located within the proximity of an enclosed body of water. The nearest enclosed body of water, MacArthur Lake located approximately 0.75 mile to the east of the Project Site, is too far to affect the Project Site. As such, there is no potential for exposure of people to a seiche or a tsunami. In addition, the Project Site is not positioned in a hillside or landslide area that could be prone to potential mudflow.[64] Thus, no impacts associated with inundation by seiche, tsunami, or mudflows would occur under the Project.

10. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located within an active area that is developed with a mix of mid- and high-rise mixed-use and commercial buildings, restaurants, institutional uses, multi-family neighborhoods, and the Vermont/Wilshire Metro Red Line Station complex. Existing uses on the Project Site include the five-story, Galleria Building and a 155-space surface parking lot. The Project Site is located within a Regional Center designation under the General Plan Framework Element. The Project Site is bordered on the north, west, and south by Wilshire Boulevard, Hampshire Avenue, and 7th Street, respectively. A public alley divides the Project Site from the existing high-rise office buildings and parking garage on the adjacent parcel to the east. The Project would adaptively reuse the Galleria Building as a hotel and construct new 7-story mixed-use and 35-story high-rise mixed-use buildings in place of the existing parking lot. High rise buildings are clustered throughout the immediate area and include the 448-foot-high, 34-story Equitable Plaza Building, located at 3435 Wilshire Boulevard a few blocks to the west, and the 29-story, The Vermont complex, located one-half block to the east of the Project Site.

The Project Site is separated from existing uses in the established community by Wilshire Boulevard, a designated Avenue I route; and 7th Street, a designated Avenue II route in the Mobility Plan 2035. Avenue I and Avenue II are Major Highway Class II designations and are characterized by 100-foot-wide and 86-foot-wide rights of way, respectively. Vermont Avenue, one-half block to the east is also designated as Avenue I. The Project would be separated from surrounding land uses by existing city streets and from lower-density neighborhoods to the south by 7th Street. It would not directly abut any lower-density properties and, thus, would not divide an established community by encroachment. The Project would not disrupt or divide an established community through a change in street or land use patterns on surrounding streets. It

63 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1996.
64 City of Los Angeles General Plan, Safety Element Exhibit C, Landslide Inventory & Hillside Areas, March 1996.

would not divide an established community through the introduction of incompatible uses within the designated Regional Center.

Thus, given the existing mix of uses in the Project vicinity and the location of the Project Site within an existing developed Site and underutilized parking lot, the Project would not physically divide, disrupt, or isolate an established community. Therefore, impacts with respect to the division of an established community would be less than significant.

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?

Less Than Significant Impact. Proposed planning and zoning actions for the Project include the following:

- Site Plan Review (Sec. 16.05)
- Density Bonus Conformance Review for an approximately 13% density bonus (up to 35 percent allowed) with the provision of 11 percent very low income housing units. This request includes on menu-incentives for increased FAR and density/FAR averaging in accordance with LAMC Sec. 12.22 A.25.
- Vesting Conditional Use Permit for a mixed-use development in an R5 zone in a Redevelopment Area in accordance with Sec. 12.24 W.15 and 12.24 T.
- Vesting Conditional Use Permit for a hotel within 500 feet of a residential zone in accordance with LAMC Sec. 12.24 W.24 and 12.24 T.
- Vesting Tentative Tract Map No. 74117 for a two lot subdivision, with 545 condominium units, and to designate New Hampshire Avenue as front yard for each lot in accordance with LAMC Sec. 17.01.
- Conditional Use Permit for on-site sales and consumption of alcoholic beverages at a hotel, two restaurant/lounges within the hotel, and a restaurant in the high-rise mixed-use building in accordance with LAMC Sec. 12.24 W.1.
- Other approvals, such as haul route designation and building permits, will also be required.

General Plan Framework

The General Plan Framework designates an area centered on Wilshire Boulevard between the Harbor Freeway (where it adjoins the Downtown Center) and Western Avenue, east to west, and between 3rd Street and 8th Street north to south as the Wilshire Regional Center. The Project Site is located in the approximate center of this designated area. The Framework defines "Regional Center" as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government

buildings, major health facilities, major entertainment and cultural facilities and supporting services. As stated in the General Plan Framework: "Some Regional Centers will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs."[65] The Framework also states that Regional Centers are typically high-density places in which physical form is substantially differentiated from the lower-density neighborhoods of the City.[66]

Objective 3.10 of the General Plan Framework is to "reinforce existing and encourage the development of regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, and are compatible with adjacent land uses, and are developed to enhance urban lifestyles."[67] The Framework further defines the physical structure of Regional Centers as containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages. According to the Framework, the intensity of activity and incorporation of retail uses on the ground floor should induce considerable pedestrian activity.[68]

The Economic Development Chapter of the General Plan Framework includes policies to facilitate business retention and job growth. To establish a basis for the interrelated goals of job creation, stimulation of Citywide economic development, and the provision of development incentives, the following types of areas are the focus of this Chapter:

- Existing commercial centers and corridors
- Existing growing industrial/business sectors
- Existing large industrial sites suitable for reuse
- Emerging commercial and industrial areas, perhaps without current suitable sites
- Existing Enterprise Zones and Incentive Areas
- Adopted Center locations
- Proposed community focal points and transit centers
- Existing and projected transit facilities concentrations.[69]

The Housing Element of the General Plan identifies the City's housing needs and carries forward the goals of the Framework Element to encourage infill development and increased density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. Goal 1 of the Housing Element is to provide an adequate supply of ownership and rental

65 City of Los Angeles, General Plan Framework Element, Long Range Land Use Diagram, Metro.
66 General Plan Framework, Chapter 3, Regional Centers.
67 Ibid.
68 Ibid.
69 General Plan Framework, page 7-1.

housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs and Objective 1.3 is to expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.

The Project Site is located within a Los Angeles State Enterprise Zone and a Transit Priority Area, and would meet the objectives of the land use, economic and housing policies of the General Plan Framework to provide a diversity of uses, including hotel, restaurants, commercial, high-density residential uses, and affordable housing within a designated Regional Center in proximity to transit. The Project's high-density mixed uses would the meet the Framework objectives to support the General Plan Framework's land use, economic and housing goals to enhance urban lifestyles with proximity to services, entertainment, retail, and transit. The residential and hotel components would increase pedestrian activity during the evening and weekends, thus, enlivening the street environment and would therefore meet Policy 3.10.3 to promote the development of high-activity areas in appropriate locations to induce pedestrian activities. 7th Street (a designated Avenue II or Class II Major Highway) would separate the Project Site from lower density residential neighborhoods to the south and would, thus, be consistent with Policy 3.10.3 to provide adequate transitions with adjacent residential uses at the edges of Regional Centers. The Project would be consistent with Framework discussions related to the placement of housing on upper floors with buildings sited along sidewalks. Because the Project would not conflict with the General Plan Framework land use designation and objectives, impacts with respect to the Framework would be less than significant.

Wilshire Community Plan

The Project Site, between Wilshire Boulevard and 7th Street, is designated for commercial uses under the Wilshire Community Plan. Within the Project Site, the parcel containing the Wilshire Galleria is zoned both C4-2 and R5-2, and the area containing the parking lot is zoned R5-2. Issues defined under the Wilshire Community Plan for residential areas include the need to preserve the existing character of residential neighborhoods while accommodating more affordable housing.[70] The Project would preserve the existing character of residential neighborhoods by confining high intensity development within the Regional Center and designated commercial area; thus, not encroaching upon or removing existing residential uses while providing 54 units of affordable housing.

Issues related to commercial areas include the need for better cohesiveness, diversity, and continuity of complementary uses along commercial frontages. Also, according to the Community Plan, new commercial development needs to be compatible with existing buildings with respect to architectural design, bulk, and building heights.[71] The Project would address these issues by improving the street front along Wilshire Boulevard with entrances (public access) along the sidewalk on Wilshire Boulevard and also by providing street-oriented commercial frontage along New Hampshire Avenue. The height and density of the Project would

70 *City of Los Angeles, Wilshire Community Plan, page I-5.*
71 *Wilshire Community Plan,* page I-5.

be consistent with the grouping of high-rise development in the immediate area (see Figure A-2, *Aerial Photograph with Surrounding Land Uses*, in Attachment A of this MND). The majority of adjacent and nearby high-rise buildings exceed 15 stories.

Respective Wilshire Community Plan goals and policies include Goal 1 to provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community.[72] Goal 2 of the Community Plan is to encourage strong and competitive commercial sectors that proposed economic vitality and serve the needs of the Wilshire Community through well-designed, safe, and accessible areas, while preserving historic and cultural character.[73]

The Project would be consistent with Wilshire Community Plan Goal 1 to provide a secure and high quality development for all economic, age, and ethnic segments of the Wilshire Community. The Project would provide 11 percent very-low-income housing units (11 percent of 545 = 54 affordable units), which would help to accommodate a diversity of economic and age segments of the community. Also, the activity generated by the Project's residential component, provision of secure on-site parking and entrances, and pedestrian lighting in the existing surface parking lot would enhance the security of the Project area and residents. The Project would also be consistent with Goal 2 to enhance the economic environment by providing a hotel and ground-floor restaurant and commercial uses, as well as enhancing the street front and upgrading and re-purposing the historically significant Galleria Building. Because the Project would be consistent with the commercial designation in the Wilshire Community Plan and would address issues expressed in the plan, as well as consistency with the primary residential and commercial goals of the Community Plan, it would not conflict with the purpose of the Community Plan. Therefore, impacts with respect to the Community Plan would be less than significant.

Redevelopment Plan for the Wilshire Center/Koreatown Recovery Project

The Redevelopment Plan for the Wilshire Center/Koreatown Recovery Project (adopted December 13, 1995) is intended to eliminate and prevent the spread of blight in the Redevelopment Area; to encourage the involvement and participation of property owners, residents, and others to meet the Wilshire Community's diverse needs, to promote the economic, social, cultural, and physical well-being through the revitalization of the residential, commercial, and industrial areas, and to promote livability of the area as a cohesive and sustainable neighborhood; to encourage the development of housing in a wide range of types, prices, rent levels and ownership options; to enhance the safety and security of residents, businesses, employees and visitors; to provide for an efficient circulation system coordinated with land uses and densities and adequate to accommodate traffic; to encourage public transit service; preserve historical buildings and monuments; and to meet a broad range of other social and cultural objectives.

72 *Wilshire Community Plan*, page III-2
73 *Wilshire Community Plan*, page III-9.

The Project would promote the livability of the Redevelopment Area as a cohesive and sustainable neighborhood and, as such, would not conflict with the objectives of the Redevelopment Plan. The Project represents an investment in the upgrade of the existing Project Site and the introduction of a greater diversity of land uses to the Redevelopment Area. The Project would rehabilitate and adaptively re-use the Galleria Building to provide high-quality lodging and recreational opportunities for the community. The Project would increase the community's range of high quality rental housing, including affordable housing. The new street front construction, higher pedestrian activity during evenings and weekends, and improved lighting would enhance and improve security along the Wilshire Boulevard and New Hampshire Avenue. The Project would locate high-density housing near the Vermont/Wilshire Metro Red Line Station and, thus, encourage public transit. Because the Project would not conflict with the objectives of the Redevelopment Plan for the Wilshire Center/Koreatown Recovery Project, it would have a less than significant impact with respect to this plan.

Los Angeles Adaptive Reuse Ordinance

Portions of the Wilshire Center/Koreatown Redevelopment Project along Wilshire Boulevard between approximately Hoover Street and Wilton Place, which includes the Project Site, are designated as an Adaptive Reuse Area. The purpose of the Adaptive Reuse Ordinance, enacted April 12, 2004, is to facilitate conversion of older economically distressed or historically significant buildings from commercial office space to residential dwelling units or hotel uses. The Project would adaptively re-use the Galleria Building into a hotel and construct new mixed-use mid-rise and high-rise buildings consistent with the Adaptive Reuse Ordinance. Further, as discussed under Response No. 5.a, above, potentially significant impacts to the historically significant Galleria Building would be reduced to a less than significant level during the adaptive reuse of the Building. Accordingly, the Project would not conflict with this ordinance.

Los Angeles Municipal Code

The Project Site contains two zoning classifications. The portion of the Site containing the Galleria Building is zoned C4-2 and R5-2 and the portion of the Site containing the existing surface parking lot is zoned R5-2. The C4-2 and R5-2 zoning designations allow for commercial and high-density residential development. Under the R5 zone, the minimum lot area per dwelling unit is 200 square feet (LAMC Sec. 12.12 C.4). LAMC Sec. 12.22 A.25 (Affordable Housing) provides for a density bonus for sale or rental housing with low or very low income restricted units. The Project would provide 11 percent very low income housing units. Under Sec. 12.21 A.25 (c), 11 percent very low income units allows for a density bonus of 35 percent. A density bonus of 35 percent of the permitted 483 base units would allow up to 653 units to be developed. However, the Project is only requesting an approximately 13% density bonus for a total of 545 units. In addition to the Density Bonus, the Project with 11 percent very low income units qualifies for two on-menu incentives per Sec. 12.22 A.25 (e).

On-menu incentives under LAMC Sec. 12.22 A.25(f)(4) allow a percentage increase in the allowable FAR. Based on a buildable lot area of 90,455 square feet, the allowable FAR for the Project Site is 542,730 square feet. The Project includes a total floor area of 608,202 square feet,

an approximate increase of 65,472 square feet, or approximately 12 percent over the floor area allowed under the by-right 6.0 FAR. The Project would result in a maximum FAR of 6.83:1. The first on-menu incentive allows for an increase in the allowable FAR equal to the percentage Density Bonus for which the Project is eligible. The proposed 6.83:1 FAR (a 13% increase) is well below the allowable 35% Density Bonus to which the Project is eligible. The second on-menu incentive, per Sec. 12.22 A.25(8), allows for floor area, density, open space and parking averaging over the Project Site, and permits vehicular access from a less restrictive zone (C4) to a more restrictive zone (R5).

The proposed hotel and restaurant uses are permitted uses in the C4-2 portion of the Project Site and the proposed residential uses are consistent with the underlying R5-2 portion of the Project Site. However, the proposed residential buildings are intended as mixed use, containing a total of 5,102 square feet of commercial uses at the street level. Because commercial uses are not permitted by right in the R5 zone, the applicant is applying for a Vesting Conditional Use Permit (CUP) for a mixed-use development in an R-5 zone in a Redevelopment Area in accordance with Sec. 12.24 W.15 and 12.24 T. The Applicant is also seeking Vesting CUP to allow the location of the proposed hotel within 500 feet of a residential zone.

Other proposed approvals include a CUP for on-site sales and consumption of alcoholic beverages at the two restaurant/lounges within the hotel and a restaurant in the high-rise mixed-use building in accordance with Sec. 12.24.W.1 The Project would be consistent with the requirements of Sec. 12.24.W.1(a) in that the Project Site is located within an existing Regional Center that supports restaurants and on-site alcohol service. The proposed restaurant/lounge uses are not oriented toward and would not encroach into the existing, residential neighborhoods to the south of 7th Street that are not within the designated Wilshire Regional Center.

The Project would provide approximately 61,425 square feet of residential open space, which would exceed code requirements of 59,600 square feet based on the number of units and mix of unit types as set forth under Planning and Zoning Code Sec. 12.21.G.

Finally, the Project would be subject to Site Plan review per LAMC Section 16.05. Site Plan Review applies to any development which creates or results in an increase of 50,000 gross square feet or more of nonresidential floor area, any development project which creates or results in an increase of 50 or more dwelling units or guest rooms, or combination thereof, or any development project which results in a net increase of 1,000 or more average daily trips. The purposes of Site Plan Review are to promote orderly development, evaluate and mitigate significant environmental impacts, and promote public safety and the general welfare by ensuring that development projects are properly related to their sites, surrounding properties, traffic circulation, sewers, other infrastructure and environmental setting; and to control or mitigate the development of projects which are likely to have a significant adverse effect on the environment as identified in the City's environmental review process, or on surrounding properties by reason of inadequate site planning or improvements.

Based on the above, the Project, with approval of the requested discretionary approvals, would not conflict with an applicable land use plan, policy or adopted for the purpose of avoiding or

mitigating an environmental effect. Thus, less than significant impacts would occur with Project implementation.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Project Site is located within the highly urbanized Wilshire Community Plan Area and designated Regional Center. The Project Site is currently developed with Galleria Building and a paved surface parking lot. No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat HCP, NCCP, or other approved local, regional, or State habitat conservation plan in place for the Project Site. Therefore, the Project would not conflict with any habitat conservation plan or natural community conservation plan. No impact would occur in this regard.

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?

No Impact. Oil and gas, mineral resources of value to the region and State, are the primary mineral resources within the City of Los Angeles. These resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers. Within the City of Los Angeles, oil drilling districts and oil fields are concentrated in an area reaching from downtown Los Angeles to just west of the 405 Freeway, and in the north San Fernando Valley. As shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, the nearest mineral resources to the Project Site are the LA City Oil Drilling District and its respective State Designated Oil Field, which are located between Wilshire Boulevard and 3rd Street, extending to the west of Vermont Avenue on its west edge and to the east to approximately Figueroa Street on its east edge.[74] The Las Cienegas Oil Field is located to the south of the Project Site in the approximate location of Olympic Boulevard. This oil field reaches from downtown Los Angeles on the east to La Cienega Boulevard on the west. Both of these fields are designated as "major drilling areas." The Project Site does not encroach on either of these nearby major oil drilling districts and fields and, as such, would not result in the loss of availability of this known mineral resource. Therefore, there would be no impact to mineral resources.

[74] City of Los Angeles General Plan Safety Element, Exhibit E, Oil Fields and Oil Drilling Areas in the City of Los Angeles, May 1994.

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

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.[75] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, as well as not being located within a City oil drilling district or State designated oil field, it would not result in the loss of availability of these locally-important mineral resources. Therefore, there would be no impact to locally-important mineral resources.

12. Noise

Would the project result in:

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

Less Than Significant Impact With Mitigation Incorporated. Noise is defined as unwanted sound. But not all unwanted sound rises to the level of a potentially significant environmental impact. To differentiate unwanted sound from potentially significant noise impacts, the City has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses resulting from construction and operation of the Project. As discussed below, implementation of mitigation measures would ensure a less than significant impact with respect to construction noise.

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of

[75] City of Los Angeles General Plan Conservation Element, Exhibit A, Mineral Resources, March 2001.

human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude. When all the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequency spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.

An individual's noise exposure is a measure of noise over a period of time. A noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. This time-varying characteristic of environmental noise is described using statistical noise descriptors. The most frequently used noise descriptors are summarized below:

L_{eq}: The L_{eq}, or equivalent sound level, is used to describe noise over a specified period of time in terms of a single numerical value; the L_{eq} of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The L_{eq} may also be referred to as the average sound level.

L_{max}: The maximum, instantaneous noise level experienced during a given period of time.

L_{min}: The minimum, instantaneous noise level experienced during a given period of time.

L_x: The noise level exceeded X percent of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: Also termed the day-night average noise level (DNL), the L_{dn} is the average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dB to measured noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account nighttime noise sensitivity.

CNEL: Community Noise Equivalent Level (CNEL), is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dB to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dB to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Regulatory Framework

City of Los Angeles Municipal Code

Section 41.40 prohibits any construction or repair work of any kind upon between the hours of 9:00 p.m. and 7:00 a.m. of the following day. It also prohibits construction activities before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday nor at any time on any Sunday.

Section 91.1207.11.2 limits the interior noise levels to not exceed 45 dBA CNEL in any habitable room.

Section 91.1207.11.4 states that the locations where CNEL exceeds 60 dBA shall require an acoustical analysis showing that the proposed design will limit exterior noise to the prescribed allowable interior noise level.

Section 114.03 prohibits loading/unloading activities, including operation of dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building, between the hours of 10:00 p.m. and 7:00 a.m.

Section 112.02 prohibits operating any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than five (5) decibels.

Section 112.05 defines maximum noise level of powered equipment or powered hand tools. The noise level is limited to 75 dBA at 50 feet for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment, between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500

feet. However, noise limitations shall not apply where compliance is technically infeasible, which means that noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise source occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise source occurring five minute or less in any one-hour period between the hours of 7:00 a.m. and 10:00 p.m.

City of Los Angeles General Plan

In addition to the previously described LAMC provisions, the City has also established noise guidelines that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.[76] **Table B-10**, *Guidelines for Noise Compatible Land Use*, provides the guidelines of land use compatibility for community noise sources. The CNEL noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable." A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

Thresholds of Significance

With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase.

Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases), with consideration of existing ambient noise conditions, and City's land use noise compatibility guidelines. Therefore, the Project would result in a significant noise impact if:

- Construction-related noise levels exceed 75 dBA at distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;

- Project on-site stationary sources (i.e., air conditioning units, pumps) increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA or more;

76 *State of California*, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

TABLE B-10
GUIDELINES FOR NOISE COMPATIBLE LAND USE

	Day-Night Average Exterior Sound Level (CNEL, dB)						
Land Use Categories	**50**	**55**	**60**	**65**	**70**	**75**	**80**
Residential Single-Family, Duplex, Mobile Homes	A	C	C	C	N	U	U
Residential Multi- Family	A	A	C	C	N	U	U
Transient Lodging, Hotel, Motel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/N	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

Based on the Governor's Office of Planning and Research, "General Plan Guidelines", 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels.
A = Normally Acceptable: Specified land use is satisfactory, based upon the assumption buildings involved are conventional construction, without any special noise insulation.
C = Conditionally Acceptable: New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will suffice.
N – Normally Unacceptable: New construction or development generally should be discouraged. A detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design of a project.
U – Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles General Plan, Noise Element, 1999.

- Project-related off-site traffic increase ambient noise levels along roadway segments with sensitive receptors by 5 dBA (CNEL) or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either "normally acceptable" or "conditionally acceptable"; or cause ambient noise levels to increase by 3 dBA (CNEL) or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either "normally unacceptable" or "clearly unacceptable"; or

- Project exterior noise levels exceed 60 dBA CNEL for on-site Project hotel and multi-family uses.

Existing Conditions

The Project Site is located on the east side New Hampshire Avenue between Wilshire Boulevard and 7th Street in the City's Central Wilshire/Koreatown Community. Existing land uses around the Project Site include the following:

- North - Land Uses immediately north of the Project Site are primarily non-sensitive commercial land uses. Further away to the northeast of the Project Site, the Wilshire Vermont Station Apartments, a noise-sensitive 7-story, 180-unit mixed-use complex, with ground-level retail and restaurant uses is located at the northeast corner of the Wilshire Boulevard and Vermont Avenue.

- East - Land uses immediately east of the Project Site, which share the same block occupied by the Project Site are non-sensitive commercial uses. Commercial, retail, and parking uses are located on the east side of Vermont Avenue. Noise-sensitive multi-family residential uses are located further to the east of the Project Site along Shatto Place.

- South - Most of the uses to the south of the Project Site, south of 7th Street, are primarily established noise-sensitive residential neighborhoods of 2- to 5-story multi-family homes. The Cornelius B. Penberth Child Study Center/ Children's Institute, a noise sensitive use, is located to the south of the Project Site at the southwest corner of 7th Street and New Hampshire Avenue.

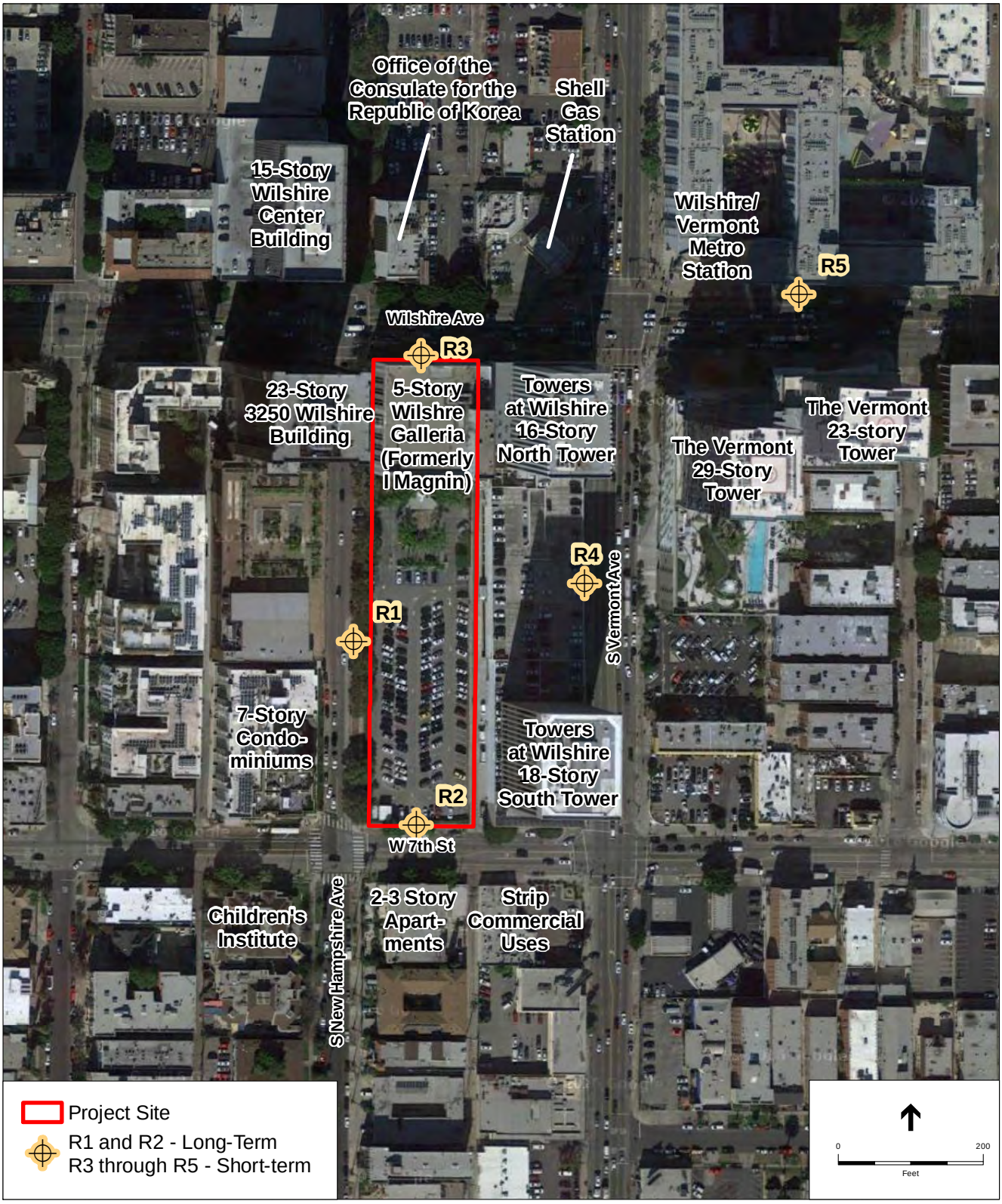
- West – A seven-story apartment building at 685 New Hampshire Avenue is located at the northwest corner of 7th Street and New Hampshire Avenue, directly across the street, to the west of the Project Site. The 24-acre Robert F. Kennedy Community Schools campus is located between Wilshire Boulevard and 8th Street, two blocks west of the Project Site. These uses are also noise sensitive.

To quantify the existing noise environment, short-term (15-minute) measurements during daytime peak hours were recorded at Locations R3, R4, and R5. Long-term (24-hour) measurements were conducted at two locations, identified as R1 and R2, as shown on **Figure B-3**, *Noise Measurement and Sensitive Receptor Locations.*

The ambient noise measurements were made in accordance with the City's standards.[77] Two long-term (24-hour) measurements were taken on May 11, 2016. Three short-term (15-minute) measurements were taken at locations R3, R4, and R5. The ambient noise measurements were conducted using a Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. Measurement instruments were calibrated and operated according to manufacturer specifications. The microphone was placed at a height of 5 feet above the ground level.

These locations provide a representative characterization of the existing noise conditions within the Project vicinity. The results of the ambient noise measurement data are summarized in **Table B-11**, *Summary of Ambient Noise Measurements*. As shown in Table B-11, the measured L_{eq} ranged from 62 to 72 dBA.

77 Los Angeles Municipal Code, Section 111.01.



SOURCE: Google Maps, 2015 (Aerial); ESA PCR, 2016

698 New Hampshire

Figure B-3

Noise Measurement and Sensitive Receptor Locations

ESA PCR

TABLE B-11
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Site ID	Monitoring Date(s)	Start Time	End Time	L_{eq}	L_{max}	L_{min}	L_{10}	L_{50}	L_{90}	CNEL
R1	5/11-5/12/2016	12:00 a.m.	12:00 a.m. (next day)	62	94	52	64	59	56	67
R2	5/11-5/12/2016	12:00 a.m.	12:00 a.m. (next day)	63	98	50	61	58	55	66
R3	5/11/2016	10:17 a.m.	10:32 a.m.	69	78	59	72	68	62	--
R4	5/11/2016	10:55 a.m.	11:10 a.m.	72	85	60	75	71	64	--
R5	5/11/2016	10:36 a.m.	10:51 a.m.	72	88	62	74	70	65	--

SOURCE: ESA PCR, 2016.

Construction Noise

Construction is anticipated to begin in early 2017. The expected duration of construction is approximately 31 months. The Project is anticipated to be fully operational in 2020. The assessments include construction noise impacts to the noise sensitive receivers in the vicinity of the Project Site due to the operation of construction equipment (on-site construction activities) and due to haul truck activities (off-site construction activities).

On-Site Construction Activities

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, site preparation, excavation, foundation construction, and building construction. The noise levels created by construction equipment would vary depending on factors such as the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction noise associated with the Project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing based on construction equipment data provided by the Applicant's contractor. **Table B-12,** *Construction Equipment and Estimated Noise Levels (Leq)*, presents the list of construction equipment and approximate quantities per construction phase with reference noise levels.

These noise levels account for the Project contractor(s) equipping construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. Also, the Project would be required to 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. The estimated noise levels represent a conservative scenario because construction activities are analyzed as if some of them were occurring along the perimeter of the construction area, whereas construction would typically occur throughout the Site, further from noise-sensitive receptors. Regardless of noise levels at noise sensitive receivers, because the Project Site is

TABLE B-12
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS (LEQ)

Construction Equipment	Noise Level at 50 ft (dBA)	Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level at 50 ft (dBA)
Demolition				
Air Compressor	80	40	1	
Tractor/Loader/Backhoe	80	40	3	
Concrete/Industrial Saw	90	20	1	
Crawler Tractor	80	40	1	
Crushing/Processing Equipment	85	40	1	92
Dumper/Tender	85	40	4	
Excavator	85	40	1	
Rubber Tired Loader	80	40	1	
Water Truck	84	40	2	
Haul Truck	84	40	2	
Site Prep/Grading				
Crawler Tractor	80	40	1	
Excavators	85	40	1	84
Rubber Tired Loader	80	40	1	
Bore/Drill Rig	85	20	1	
Excavation/Export				
Tractor/Loader/Backhoe	80	40	1	94
Haul Truck	84	40	27	
Drainage/Utilities/Sub-Grade				
Tractor/Loader/Backhoe	80	40	1	80
Trencher	85	20	1	
Building Construction				
Air Compressor	80	40	2	
Tractor/Loader/Backhoe	80	40	4	
Cement/Mortar Mixer	90	20	2	
Crane	85	16	1	90
Forklift	85	20	2	
Generator Set	82	50	1	
Vendor Truck	55	40	17	
Architectural Coatings				
Air Compressor	80	40	1	76
Paving				
Pavers	85	50	1	
Rollers	85	20	1	84
Paving Equipment	80	20	1	

Note: Noise Levels at 50 ft and Usage Factor are derived from Federal Highway Administration's Roadway Construction Noise Model User's Guide.

SOURCE: ESA PCR, 2016

located within 500 feet of residential uses, the construction noise would be considered a potentially significant impact due to the exceedance of the 75 dBA standard at 50 feet. Therefore, Mitigation Measures NOISE-1 to NOISE-4 are prescribed for the Project.

Implementation of Mitigation Measures NOISE-1 through NOISE-4, which would require the implementation of noise reduction devices and techniques during construction at the Project Site, would serve to reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible. With implementation of these mitigation measures, the construction activities associated with the proposed Project would comply with the noise regulations established in Sections 41.40 and 112.05 of the LAMC. Further, the Project's construction activities, including delivery and haul routes, would be restricted to hours between 7:00 A.M. and 9:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday per LAMC requirements. No noise-generating construction activities would take place on Sundays and holidays (observed by the City). Therefore, with respect to a violation of the noise standards and regulations established in the LAMC, potentially significant noise impacts during Project construction would be reduced to a less than significant level with compliance to applicable regulatory requirements and implementation of the prescribed mitigation measures.

Mitigation Measures

MM NOISE-1 Noise-generating equipment operated at the Project Site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2 The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that includes permitted construction days and hours.

MM NOISE-3 Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously.

MM NOISE-4 Temporary noise barriers shall be used to block the line-of-site between construction equipment and noise-sensitive receptors (residences) at all times during Project construction. Noise barriers shall be a minimum of 16-foot tall along the west, south, and north boundaries, which direct lines of sight to adjacent residential uses.

Off-Site Construction Activities

During the phase of building construction, there would be approximately 264 haul truck trips per day. Because the construction hours are limited to between 7:00 a.m. and 5:00 p.m. from Monday to Friday, it is assumed that a maximum of 27 haul truck trips would occur during a peak hour. It was assumed that these trucks would exit the Project Site onto Wilshire Boulevard and drive east towards State Route 101. The existing A.M. peak hour traffic volume on Wilshire Boulevard east of Vermont Avenue is 2,453. Based on the observation during the noise measurement at R5, the

traffic mix consisted of primarily automobiles with few medium- and heavy-duty trucks.. The same traffic mix of primarily automobiles with few medium- and heavy-duty trucks was used to calculate the mobile source noise level at 50 feet from the existing traffic volume using FHWA's Traffic Noise Model, Version 2.5. The existing noise level along Wilshire Boulevard east of Vermont Ave at 50 feet would be 68.1 dBA. The noise level with the additional 27 heavy trucks would be 68.7 dBA. Therefore, the construction haul truck noise level would not exceed 75 dBA at 50 feet, and noise impacts from off-site construction traffic would be less than significant.

Operational Noise

The existing noise environment in the Project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site. Noise generated by the Project would result primarily from normal operation of the building mechanical equipment and off-site traffic.

Off-Site Traffic Noise

Vehicle trips attributed to operation of the Project would increase traffic volumes along the major thoroughfares within the Project vicinity. This increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from Project development. The street segments chosen for this analysis have residential land uses which are the most affected by traffic increases generated by the Project.

The Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5 was used to predict the noise level due to vehicular traffic. The TNM model run was validated by comparing the measured noise levels at R3, R4, and R5 to predicted noise levels for the same traffic conditions observed during the measurements. **Table B-13**, *Traffic Noise Model Validation Results*, presents the results of model validation.

TABLE B-13
TRAFFIC NOISE MODEL VALIDATION RESULTS

Measurement Location	Measured Noise Level (dBA)	Calculated Noise Level (dBA)	Net Difference
R3	69.2	68.0	-1.2
R4	72.3	69.6	-2.7
R5	71.8	69.0	-2.8

SOURCE: ESA PCR, 2016.

Caltrans *Technical Noise Supplement* guidance document states that the model is considered validated when the measured and calculated noise levels are within ±3 dB.[78] As Table B-13 indicates, the validation is within 3 dB and it is considered validated.

In order to increase traffic noise levels by 3 dBA, the traffic volumes with the Project would need to be doubled from Existing to Future with Project.[79] **Table B-14,** *Traffic Volumes for Existing and Future with Project*, includes the traffic volumes in the vicinity of the Project Site for existing and Future with Project and the associated increase in noise levels. It is assumed that the traffic mix and speed limit would remain similar for Existing and Future with Project conditions. Based on the logarithmic comparison of traffic volumes, no roadway segment would experience greater than a 1 dBA increase in traffic noise level. As shown in Table B-14, the maximum traffic noise increase would be 0.9 dBA on Wilshire Boulevard east of Vermont Avenue and on New Hampshire Avenue north of Wilshire Boulevard. Therefore, the noise level on local roadways due to the Project's off-site traffic would not exceed the 3 dBA threshold and impacts would be less than significant.

TABLE B-14
TRAFFIC VOLUMES FOR EXISTING AND FUTURE WITH PROJECT

Roadway	Roadway Segment	Existing	Future with Project	Traffic Noise Level Increase over Existing (dBA)
Wilshire Blvd	East of Vermont Ave	2,396	2,939	0.9
	Between Vermont and New Hampshire	2,520	2,973	0.7
	West of New Hampshire	2,520	2,965	0.7
7th St	East of Vermont Ave	1,141	1,229	0.3
	Between Vermont and New Hampshire	1,065	1,184	0.5
	West of New Hampshire	689	738	0.3
Vermont Ave	North of Wilshire	2,494	2,988	0.8
	Between Wilshire and 7th	2,626	3,015	0.6
	South of 7th	2,514	2,912	0.6
New Hampshire Ave	North of Wilshire	796	976	0.9
	Between Wilshire and 7th	898	1092	0.8
	South of 7th	625	777	0.9

Note: Traffic volumes are P.M. Peak Hour. Volumes from Traffic Impact Analysis for Wilshire Mixed Use Project, 2016.

Noise calculations are provided in Appendix I of this MND.

SOURCE: ESA PCR, 2016.

78 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

79 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, p. 2-3, May 2006. The A-weighted sound level is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dBA increase in sound level. Therefore, a doubling of the traffic volume is required to double the sound energy.

On-Site Operational Noise

The operation of mechanical equipment typical for developments like the Project, such as air conditioners, fans, generators, and related equipment may generate audible noise levels. Mechanical equipment is typically located on rooftops or within buildings, and is shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. Additionally, there is existing mechanical equipment on the top of the existing Galleria Building generating a similar noise level to the Project. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls to comply with noise limitation requirements provided in Section 112.02 of the LAMC, which limits the noise from such equipment causing an increase in the ambient noise level by more than five decibels. Therefore, operation of mechanical equipment would not exceed the City's thresholds of significance and impacts would be less than significant.

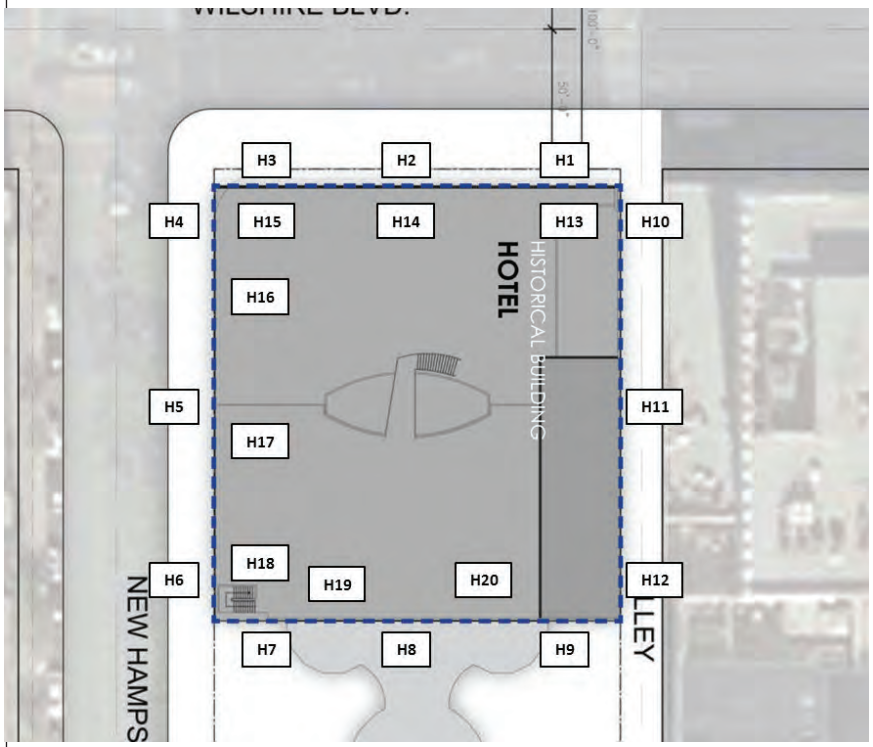
A loading dock would be located on the ground level at the high-rise building with accesses from both New Hampshire Avenue and 7th Street. This loading dock would be located within an enclosed area of the building at the ground level. While the loading dock would generate noise from activities such as truck movements and idling along with general loading/unloading operations, the location of this area within an enclosed area of the building would shield the adjacent off-site sensitive uses from this noise source. Thus, given the design of the loading area within the high-rise building, noise levels generated from this area would not increase the ambient noise levels at off-site sensitive receptor locations. In addition, the east side of the motor court off the porte cochere could be used as a loading area for the Hotel. This area is far removed the nearest sensitive noise receptors south of 7th Street, with the new mid- and high-rise buildings also intervening between the loading area and the noise sensitive receptors. As such, noise levels generated from this area would not increase the ambient noise levels at off-site sensitive receptor locations.

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

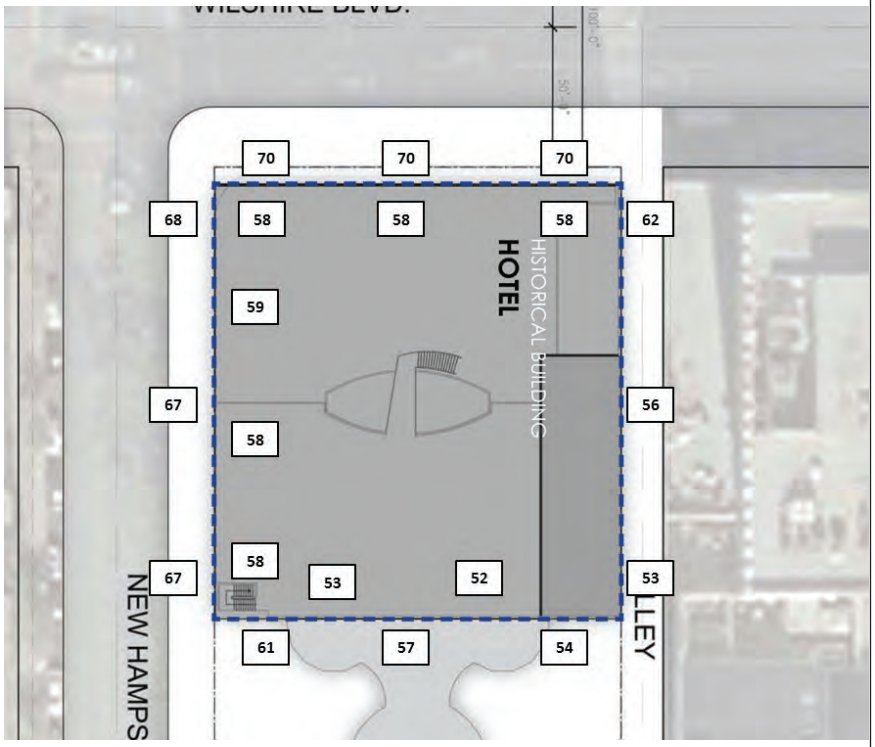
Noise Impacts to On-Site Hotel/Residential Uses

The Project would result in the development of hotel uses at the northern end of the Project Site and multi-family residential units at the middle and southern end of the Project Site. Because the development is noise sensitive, the Guidelines for Noise Compatible Land Use, presented in Table B-10, would apply. For hotel and multi-family residential uses, noise levels up to 65 dBA CNEL is considered "conditionally acceptable."

The Project would be fully completed and operational in the year 2020. The future traffic volumes with the Project completion were derived from Traffic Impact Analysis for Wilshire Mixed Use Project prepared by Overland Traffic Consultant. The predicted exterior noise levels for each building was estimated using the validated FHWA TNM Version 2.5 model and are provided in **Figure B-4,** *Exterior Noise Levels for Hotel*, **Figure B-5,** *Exterior Noise Levels for Mid-Rise Multi-Family Residential*, and **Figure B-6,** *Exterior Noise Levels for High-Rise Multi-Family Residential*.



Receiver ID
H1-H12 Exterior Façade without Patio/Balconies
H13-H20 Roof Top Open Space

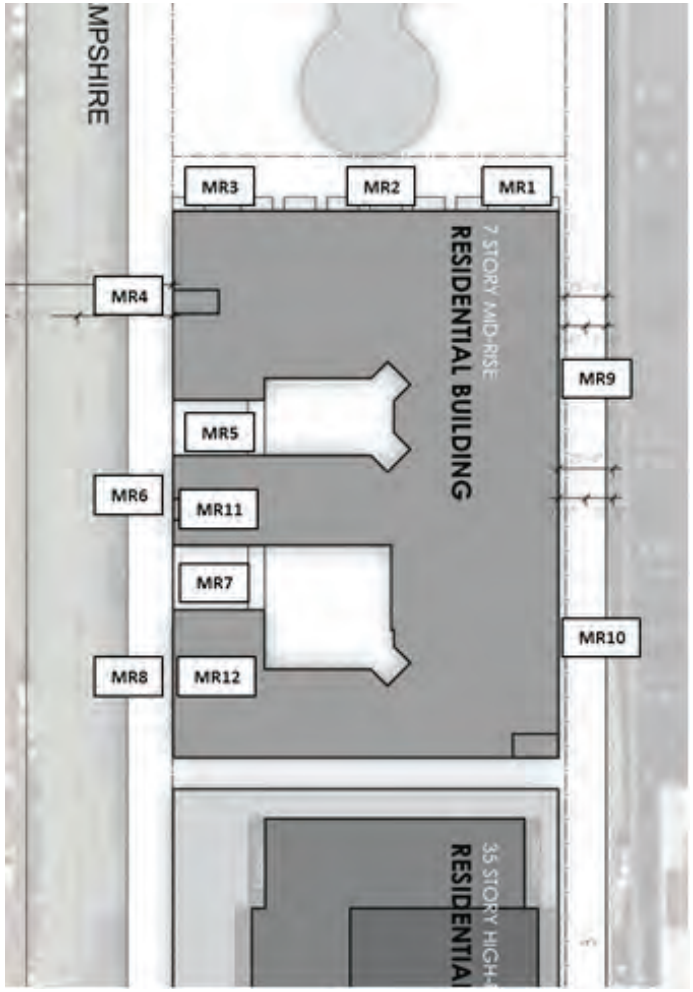


CNEL Noise Levels

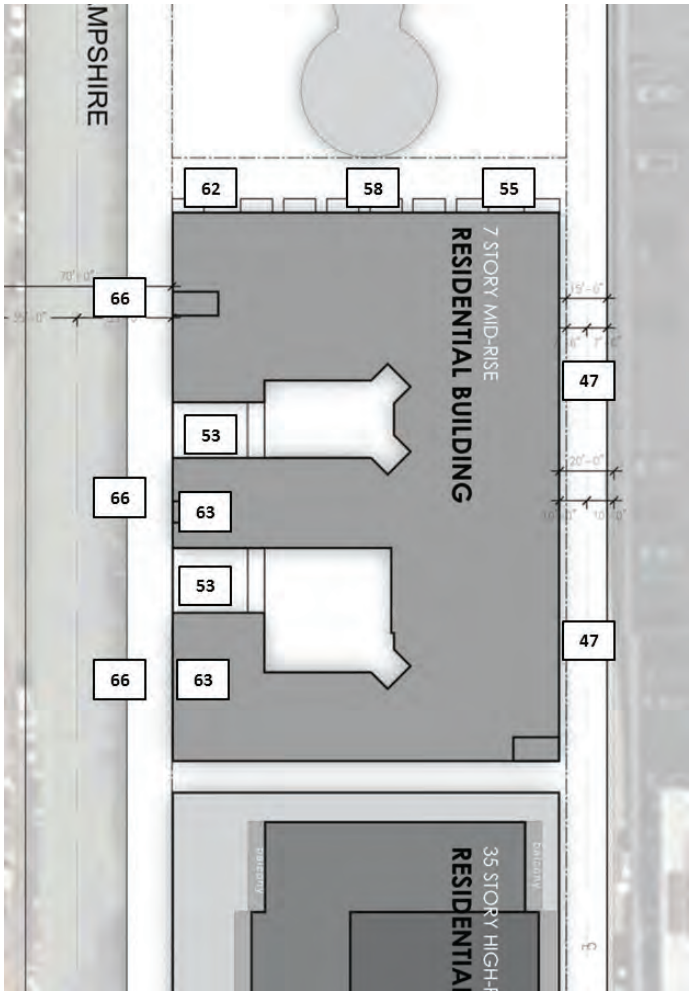
SOURCE: ESA PCR, 2016

698 New Hampshire

Figure B-4
Exterior Noise Levels for Hotel



Receiver ID
MR5/MR7 3rd Floor Open Space
MR11/MR12 Roof Top Open Space
MR1-MR3 Exterior Façade with Patio/Balconies
MR4/6/8/9/10 Exterior Façade without Patio/Balconies

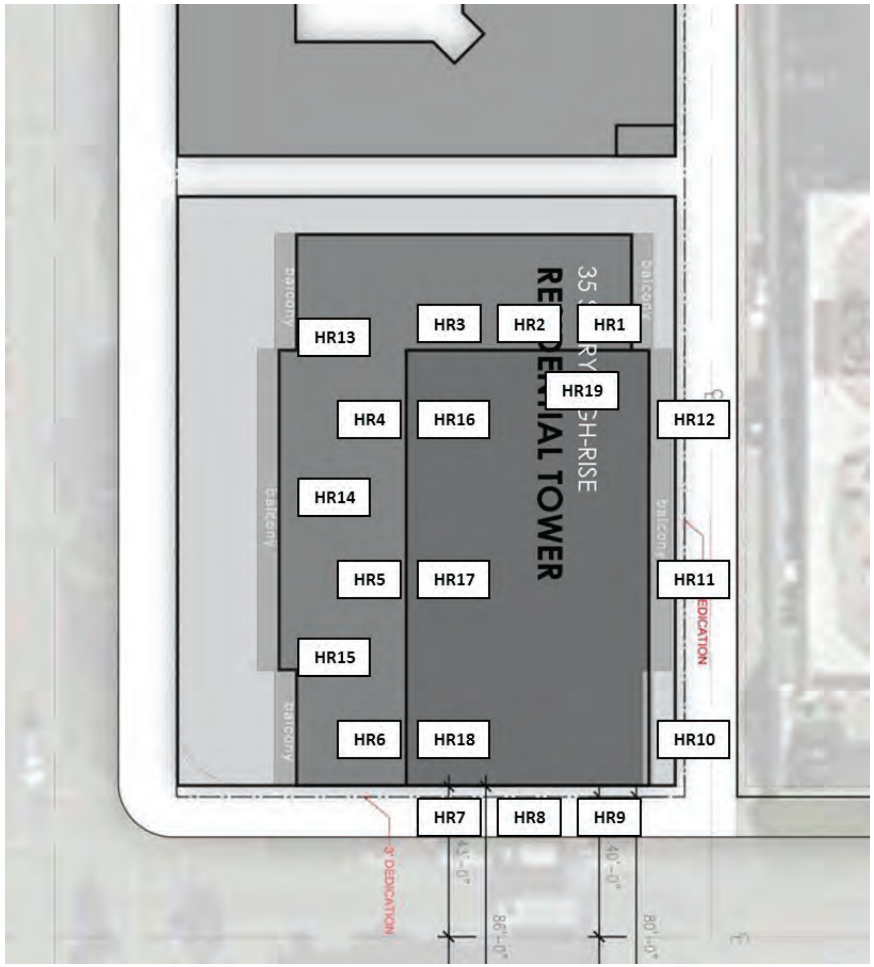


CNEL Noise Levels

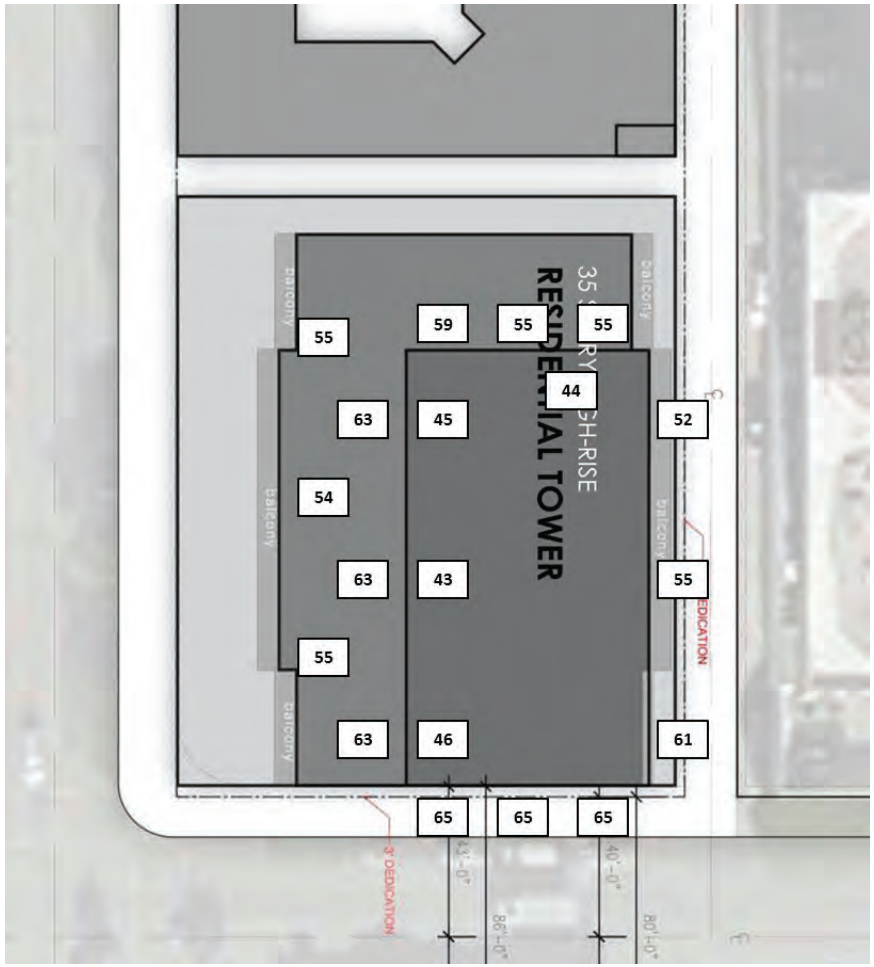
SOURCE: ESA PCR, 2016

698 New Hampshire

Figure B-5
Exterior Noise Levels for Mid-Rise Multi-Family Residential



Receiver ID
HR1-HR6 Exterior Façade with Patio/Balconies
HR7-HR12 Exterior Façade without Patio/Balconies
HR13-HR15 8th Floor Roof Top Open Space
HR16-HR19 35th Floor Roof Top Open Space



CNEL Noise Levels

SOURCE: ESA PCR, 2016

698 New Hampshire

Figure B-6
Exterior Noise Levels for High-Rise Multi-Family Residential

ESA PCR

As shown in Figures B-4 to B-6, the Project's hotel and multi-family uses would be exposed to exterior noise levels that would exceed the 60 dBA CNEL "conditionally acceptable" exterior noise level. In general, receivers exceeding 60 dBA CNEL would be considered significantly impacted by noise. As it is described in Section 91.1207.11.4 of LAMC, the locations where CNEL exceeds 60 dBA shall require an acoustical analysis showing that the proposed design will limit exterior noise to the prescribed allowable interior noise level. In addition, Section 91.1207.11.2 states that the interior noise level attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room.

To ensure operational noise impacts do not adversely impact on-site noise sensitive uses, Mitigation Measures NOISE-5 to NOISE-7 are prescribed for the Project. The prescribed mitigation measures require: preparation of an acoustical analysis to ensure noise levels do not exceed those allowed under the applicable provisions of the LAMC; parking ramp design features to minimize noise; and sound attenuating requirements in wall and floor-ceiling assemblies separating commercial tenant spaces, residential units, and public places. With implementation of the prescribed mitigation measures, potentially significant impacts would be reduced to a less than significant level.

Mitigation Measures

MM NOISE-5 An acoustical analysis by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window, and door) would provide adequate sound insulation to meet the acceptable interior noise level performance standard of 45 dBA CNEL.

MM NOISE-6 To minimize noise associated with Project parking operations: concrete, not metal, shall be used for construction of parking ramps; and the interior ramps shall be textured to prevent tire squeal at turning areas.

MM NOISE-7 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.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation Incorporated. The Project would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not cause excessive groundborne vibration. Post-construction on-site activities would be limited to residential and commercial uses that would not generate excessive groundborne vibration.

Vibration Principles and Descriptors

Unlike the case for gases and liquids, there are several types of wave motion in solids including compression, shear, and torsion and bending. The solid medium can be excited by forces,

moments or pressure fields. This leads to the terminology “airborne” (pressure fields) or “structure-borne/ground-borne” (forces and moments) vibration.

Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be comprised of a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating, measured in Hz. Most environmental vibrations consist of a composite, or “spectrum” of many frequencies, and generally are classified as broadband or random vibrations. The normal frequency range of most ground-borne vibration, which can be felt, generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz. Vibration information for this analysis has been described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec).

Vibration energy dissipates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High-frequency vibrations reduce much more

rapidly than do low frequencies, so that in the far-field zone distant from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When ground-borne vibration interacts with a building, there is usually a ground-to-foundation coupling loss; but the vibration also can be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as ground-borne noise.

Ground-borne vibration is generally limited to areas within a few hundred feet of certain types of industrial operations and construction/demolition activities such as pile driving. Road vehicles rarely create enough ground-borne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps. If traffic, typically heavy trucks, does induce perceptible building vibration, it is most likely an effect of low-frequency airborne noise or ground characteristics.

Building structural components also can be excited by high levels of low-frequency airborne noise (typically less than 100 Hz). The many structural components of a building, excited by low-frequency noise, can be coupled together to create complex vibrating systems. The low-frequency vibration of the structural components can cause smaller items such as ornaments, pictures, and shelves to rattle, which can cause annoyance to building occupants.

Human sensitivity to vibration varies by frequency and by receiver. Generally people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Ground-borne vibration related to human annoyance is generally related to root mean square (rms) velocity levels expressed in VdB.

Regulatory Framework

The City of Los Angeles does not address vibration either in the LAMC or in the Noise Element of the General Plan. Instead, Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* guidance document provides thresholds of vibration impact for structure and human annoyance.[80] This document is used to identify the impacts for this Project.

Table B-15, *Ground-Borne Vibration Impact Criteria for Human Annoyance*, and **Table B-16,** *Ground-Borne Vibration Impact Criteria for Structure Damage*, include the vibration impact criteria for human annoyance and for structure damage.

TABLE B-15
GROUND-BORNE VIBRATION IMPACT CRITERIA FOR HUMAN ANNOYANCE

Land Use Category	GBV Impact Levels (VdB re 1 micro-inch / sec)		
	Frequent Events[b]	Occasional Events[b]	Infrequent Events[d]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[e]	65 VdB[e]	65 VdB[e]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

[a] Velocity in decibels (VdB) = 1 micro inch/second
[b] "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
[c] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
[d] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
[e] This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.

SOURCE: FTA, 2006.

TABLE B-16
GROUND-BORNE VIBRATION IMPACT CRITERIA FOR STRUCTURE DAMAGE

Building Category	PPV (in/sec)	Approximate VdB[1]
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

[a] Velocity in decibels (VdB) = 1 micro inch/second

SOURCE: FTA 2006.

80 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006

Construction Vibration

Vibration impacts due to the construction activities would occur when a large machine would be operated near the fragile structures or vibration sensitive uses within a building. The FTA document includes vibration source levels for typical construction equipment. It should be noted that there would be no pile driving or blasting during the construction. **Table B-17,** *Vibration Source Levels for Typical Construction Equipment*, presents typical construction equipment with vibration source levels.

TABLE B-17
VIBRATION SOURCE LEVELS FOR TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate RMS (VdB) at 25 feet
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

SOURCE: FTA, 2006.

Structure Damage

Structures in the vicinity of the Project Site would be either non-engineered timber or engineered concrete, defined as Building Category III or II in Table B-16, respectively. In order to exceed 0.2 in/sec threshold for Building Category III, a large bulldozer would need to be located 15 feet or closer to a receiver structure. In order to exceed 0.3 in/sec threshold for Building Category II, a large bulldozer need to be located 12 feet or closer to a receiver building. It is assumed that the closest off-site Building Category III structure would be the multi-family residential building to the east across New Hampshire Avenue, which is approximately 70 feet from the Project Site. The closest off-site Building Category II structure would be the high-rise tower building to the east. It is approximately 20 feet from the Project Site. Based on the distances from the Project Site, the potential for impact of structural damage to off-site buildings would be less than significant and no mitigation measures would be required.

The Galleria Building is a component of the Project that would be subject to vibration from construction activities. Project construction would generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The construction activities that typically generate the most severe vibrations, such as blasting and impact pile driving, would not occur for the Project.

The use of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The Galleria Building would be exposed to construction vibration from activities to the south during grading and excavation, as well as construction of the mid-rise building. Construction vibration impacts to the Galleria Building would be considered potentially significant. Thus, Mitigation Measure NOISE-8 is prescribed for

the Project. Implementation of Mitigation Measure NOISE-8 would serve to reduce the vibration impacts to the Galleria Building associated with construction of the Project to the maximum extent that is technically feasible. With implementation of this mitigation measure, potentially significant vibration impacts to the Galleria Building would be reduced to a less than significant level.

Mitigation Measures

MM NOISE-8 To avoid or minimize potential construction vibration damage to finish materials on the Galleria Building, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on the Galleria Building. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.45 inches per second at the face of the building and a regulatory alarm level equivalent to 0.5 inches per second at the face of the building. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the regulatory level, work in the vicinity shall be halted and the Galleria Building visually inspected for damage. Results of the inspection must be logged. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior's Standards.

Human Annoyance

Construction activity vibration could annoy people within a building. The vibration impact threshold for human annoyance at a residential structure is 80 VdB. The closest residential structure would be the multi-family residential uses to the east across New Hampshire Avenue, which are approximately 70 feet from the Project Site. The RMS value of a large bulldozer at 70 feet would be 74 VdB. Therefore, the impact of human annoyance would be less than significant and no mitigation measures would be required.

Operation

Once construction activities have been completed, there would be no substantial sources of vibration activities from the Project Site. The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce limited levels of vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area, which also produce limited levels of vibration. These sources would generate substantially lower levels of vibration identified above for construction. Therefore, vibration impacts during Project operation would be less than significant.

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

Less Than Significant Impact. The existing noise environment in the Project area is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the Project would not have a significant effect on the community noise environment in proximity to the Project Site. Noise sources that would have potential noise impacts include: off-site vehicle traffic and mechanical (i.e., air-conditioning) equipment. Motor vehicle travel on local roadways attributable to the Project, as discussed in Response No. 12.a, would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., mechanical equipment) are also considered less than significant as discussed in Response No. 12.a. As such, noise impacts would be less than significant.

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

Less Than Significant With Mitigation Incorporated. The Project would result in a temporary increase in ambient noise near the Project Site during the construction period. Construction noise impacts are discussed in Response No. 12.a. Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed mitigation measures.

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. The Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the Project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip, or heliport or helistop. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from such uses. No impact would occur in this regard.

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)?

Less Than Significant Impact. The Project would provide 545 residential units, 27,149 square feet in common residential recreational areas, 5,102 square feet of retail uses, a 160-room hotel totaling 87,804 square feet (floor area for rooms), 15,411 square feet of hotel restaurants/lounges, a 14,335 square-foot hotel spa, and other hotel uses such as back of house and gift shop. As shown in **Table B-18**, *Potential Population Growth*, the Project would directly induce population growth by approximately 1,308 residents. Because the Project would replace existing offices and restaurant/retail uses, it would reduce total employees and, thus, result in an indirect population decrease associated with employment. The Project Site is located within a highly urban area with existing roads and services and would not indirectly increase population through new roads or other infrastructure. The Project would represent a small percentage (0.03 percent) of the SCAG's projected 2020 population for the City of Los Angeles of 4,016,977 and 4.4 percent of the SCAG's projected 2020 population for the Wilshire District of 297,770.

The location of the Project Site within a City-designated TPA and SCAG-defined Transportation -Oriented District (TOD) is consistent with the growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), which is to create denser communities connected by public transportation. A TPA is defined as an area located within one-half mile (2,640 feet) of an existing transit station. The Project Site is within 275 feet or approximately 1/10th of the allowable distance from the Metro Purple and Red Line Station. As the region's transportation planning agency, SCAG has promoted the concept of integrating transportation planning and land use planning. According to the 2016 RTP/SCS, with the passage of Senate Bill 375 for the reduction of GHGs, the State of California formalized the idea of integrating planning to meet regional reduction targets.[81]

The 2016 RTP/SCS focuses new growth around transit through the following policies: "Identifying regional strategic areas for infill and investment; structuring the plan on a three-tiered system of centers development; developing 'Complete Communities'; developing nodes on a corridor; planning for additional housing and jobs near transit; planning for changing demand in types of housing; continuing to protect stable, existing single-family areas; ensuring adequate access to open space and preservation of habitat; and incorporating local input and feedback on future growth."[82]

81 Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 3, April 2016.
82 Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 74, April 2016.

TABLE B-18
POTENTIAL POPULATION GENERATION

Use	Units or Sq. Ft.	Average Household Size[a] or Employment Generation Factor[b]	Total Population or Employees
New Mid- and High Rise Buildings			
Residential Units	545	2.40	1,308
Total Residents			1,308
Residential Recreation Decks	27,149	0.00153	42
Retail in Mid- and High-Rise	5,102	0.00271	14
Hotel Building			
Hotel (160 Rooms)	87,804	0.00113	99
Restaurant/Bar	13,364	0.00271	36
Spa	14,335	0.00271	39
Kitchen	2,047	0.00271	6
Lobby	3,049	0.00153	5
Back of the House and Other	8,218	0.00153	13
Potential Employees			254
Existing Uses			
Offices	36,322	0.00490	178
Restaurant	24,298	0.00271	66
Retail	19,524	0.00271	53
Spa	22,475	0.00271	61
Existing Employees			358
		Net Total Employees	(104)

[a] The average household size of 2.4 is based on total multi-family residents ÷ total multi-family units in the Wilshire Community Plan District U.S. Census, 2010, City of Los Angeles Planning Department website. Note that average occupancy in the adjacent Central City, which has higher density and smaller units, is 1.63 and would result in lower population increase.

[b] The employee generation factor for retail, hotel, back of hours, and office uses (per 1,000 sf) is based on the Los Angeles Unified School District, 2014 Developer Fee Justification Study, Table 12, March 2014. As a separate rate is not provided for restaurant uses, the retail employee factor was used.

SOURCE: ESA PCR, 2016 (Existing uses/floor areas from Overland Traffic Consultants, Inc., 2016)

According the RTP/SCS, these policies support the development of high quality transit areas (HQTAs). An example of an HQTA cited in the 2016 RTP/SCS is an area where people live in compact communities and have ready access to a multitude of safe and convenient transportation alternatives to driving alone, including walking and biking, taking the bus, light rail, commuter rail, the subway and/or shared mobility options.[83] The Project Site meets this criteria in that is located within a designated Regional Center and is located in proximity to transit as well as within walking and biking distance of parks, schools, houses of worship, service industries, shopping, restaurants, and entertainment. The RTP/SCS identifies Los Angeles County (including the City of Los Angeles) as currently having the highest ratio of households (48

[83] Ibid.

percent) and employment (56 percent) within HQTAs in the SCAG region. Under the SCAG definition, an HQTA is also an area within one-half mile of a fixed guideway, transit stop, or bus transit corridor.

Because the Project Site is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. Impacts with respect to population would be less than significant.

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?

No Impact (b-c). The Project Site is developed with Galleria Building that supports a mix of office and commercial uses, along with a surface parking lot. No housing would be removed or destroyed, and no displacement would occur that would require the construction of replacement housing elsewhere. In addition, the Project would provide 545 residential units that would contribute to the City's housing supply. As such, no impact with respect to displacement or replacement housing would occur. No impact would occur in this regard.

14. Public Services

Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, 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:

a. Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The LAFD's approximately 3,246 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.[84] At any given time, there are approximately 1,018 uniformed firefighters, including 270 firefighter/paramedics, on-duty at 106 fire stations across the LAFD's 471-square-mile jurisdiction.[85] LAFD fire stations within the proximity of the Project Site include Fire Station 6, Fire Station 11, Fire Station 13, Fire Station 26, Fire Station

84 Los Angeles Fire Department, Department, Overview, Website, http://lafd.org/about/lafd-overview, accessed June 2016.

85 These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department, Department Overview, http://lafd.org/about/lafd-overview, accessed June 2016).

29, and Fire Station 52, with Fire Station 13 the first responder.[86] **Table B-19**, *LAFD Fire Stations Located in the Vicinity of the Project Site*, provides information on the location, type of equipment, and the approximate distance/direction from the Project Site. Staffing at each station is dependent on the number and type of fire apparatus at the station.

TABLE B-19
LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station	Address	Apparatus Equipment	Approximate Distance/Direction from Project Site[a]
Fire Station 6	326 North Virgil Avenue	Paramedic Rescue Ambulance	1.13 miles northeast
Fire Station 11	1819 West 7th Street	Paramedic Rescue Ambulance, BLS Rescue Ambulance, Assessment Light Force, Assessment Engine	1.10 miles southeast
Fire Station 13	2401 West Pico Boulevard	Engine, Paramedic Rescue Ambulance, EMS Battalion Chief	0.86 miles south
Fire Station 26	2009 South Western Avenue	Assessment Engine, Light Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance	1.75 miles southwest
Fire Station 29	4029 West Wilshire Boulevard	Task Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance, Decon Tender	1.30 miles west
Fire Station 52	4957 Melrose Avenue	Assessment Engine, Paramedic Rescue Ambulance	1.75 miles northwest

[a] Approximate distance/direction from the Project Site in miles is a straight line distance, not a drive distance.

SOURCES:
Los Angeles Fire Department, Fire Stations, Find Your Station, Website, http://www.lafd.org/fire_stations/station_results/%2A?zipcode=90232, accessed June 2016;
California Firefighters Website, http://www.cafirefighters.com/LosAngeles.htm, accessed June 2016;
Los Angeles County Code 2 High Website, http://www.code2high.com/lacofd.htm, accessed June 2016;
Fire Station Directory, September 2013, http://www.lafdacs.org/pdf_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf, accessed June 2016.

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required

[86] Los Angeles Fire Department, Fire Stations, Find Your Station, Website, http://www.lafd.org/fire_stations/station_results/%2A?zipcode=90232, accessed June 2016 and Google Maps, accessed June 2016.

to comply with the 2013 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and existing the Project Site during construction. As such, construction activities could increase response times for emergency vehicles to local businesses and/or residences within the Project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be less than significant on a temporary and on an intermittent basis. To ensure impacts are minimized to the extent feasible, a Construction Traffic Management Plan would be prepared for the Project, which is consistent with standard City requirements. The Plan would be prepared to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Los Angeles Department of Public Works prior to construction activities. The Construction Traffic Management Plan would be prepared for review and approval by the City of Los Angeles Department of Public Works prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during Project construction.

Overall, with compliance to applicable LAFD requirements, including implementation of Project's Construction Traffic Management Plan, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant.

Operational activities associated with the Project would increase the demand for fire protection and emergency medical services. As discussed under Response No. 13.a, the Project would directly induce population growth by 1,308 persons. The estimated 1,308 persons increase in Los Angeles' population would represent a nominal 0.03 percent increase in the City's existing population (3,928,864 persons). Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies.

The Project would also be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the LAMC, and the LAFD, to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- Building Design: Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements.

- Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.

- Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.

- LAFD Access: Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. Emergency vehicles and fire access to the Project Site and surrounding area would continue to be provided via one existing and one new driveway on New Hampshire Avenue, as well as the alley to the east of the Project Site.

- Emergency Helicopter Landing Facilities (EHLF) Requirements: The Project would have an approved EHLF on the roof adjacent to or above the highest habitable level in accordance with LAMC Section 57.4705.4 or provide specific life safety features as outlined in LAFD Requirement No. 10, if an EHLF is not provided. The Project would be in compliance with all applicable ELHF requirements.

The City of Los Angeles standard mitigation requirements requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD.

The Project Site is not located in an area of moderate or very high fire hazard.[87] In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the Project Site is discussed in Section 17, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the Project Site, including minimum fire flow requirements.

87 Zimas Website, http://zimas.lacity.org/, accessed June 2016 and the Los Angeles County Fire Hazard Severity Zones in SRA, Adopted by Cal Fire on November 7, 2007, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed June 2016.

As mentioned above, up to six LAFD fire stations would provide fire protection and emergency medical services to the Project area and are dispatched based on availability and the nearest unit to a service call. The LAFD desired response time parameters are 5:20 minutes, for 90 percent of fire incident responses.[88] The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. A number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternate routes, and multiple station response. The Project vicinity is well served by several nearby fire stations within close proximity to one-another and the Project Site. Fire Station 13, at 0.86 miles from the Project Site, is anticipated to respond to the Project Site within the LAFD's desired response times. Also, fire stations have access to multiple routes to attend emergency calls. Further, as identified in Section 16, Transportation and Circulation, operational traffic impacts to the local roadway network would be less than significant.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has taken a number of steps to improve their related systems, processes and practices. Upgrades include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. Based on the ability of LAFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the Project vicinity and the multiple steps being taken by the LAFD to improve response times, Project impacts on fire protection, services, and response times are considered less than significant.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access, construction measures, and plot plan review), along with the fact that LAFD has no known or proposed plans to expand their facilities serving the Project Site, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public

[88] 6250 Sunset Project Draft EIR, prepared by PCR Services Corporation, dated November 2014 - Captain Luke Milick, Commander, Hydrant and Access Unit, LAFD, email correspondence dated August 4, 2014.

safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project is required to mitigate.

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant.

b. Police protection?

Less Than Significant Impact. Police protection for the Project Site is provided by the LAPD. The LAPD consists of approximately 9,887 sworn officers.[89] The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in the West Bureau of the LAPD, which covers approximately 124 square miles with a population of approximately 840,400 residents. The West Bureau oversees operations in the communities of Hollywood, Wilshire, Pacific, Olympic and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The West Bureau oversees operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station.[90] The nearest West Bureau police stations to the Project Site are the Olympic Community Police Station, located at 1130 South Vermont, the Wilshire Community Police Station, located at 4861 West Venice, and the Hollywood Community Police Station, located at 1358 North Wilcox Avenue, approximately 0.75 miles south, three miles southwest, and 3.20 miles northwest of the Project Site, respectively. The LAPD has a standard response time of seven minutes.[91]

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the Project Site is located in an area with high vehicular activity from Wilshire Boulevard, New Hampshire Avenue, and 7th Street. In addition, PDF PS-1 states the construction site would be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be

89 Los Angeles Police Department, COMPSTAT Citywide Profile, 5/29/16 – 6/25/16, http://assets.lapdonline.org/assets/pdf/cityprof.pdf, accessed June 2016.
90 The Los Angeles Police Department, West Bureau, http://www.lapdonline.org/west_bureau, accessed June 2016.
91 6250 Sunset Project Draft EIR, prepared by PCR Services Corporation, dated November 2014 - Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, and Officer Leonid A. Tsap, Senior Lead Officer, Community Relations Section, Crime Prevention Unit, LAPD, correspondence dated September 23, 2014.

maintained. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing, the Project's construction activities are not expected to increase demand on existing police services to a meaningful extent. Therefore, the Project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the Project would increase demand for police protection services. The estimated 1,308 persons increase in the City of Los of Los Angeles' population would represent a nominal 0.03 percent increase in the City's existing population. As the Project would replace existing offices and commercial uses, it would reduce total employees and, thus, result in an indirect population decrease associated with employment. Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. As discussed in Attachment A, *Project Description*, the Project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project would be designed in consideration of the City's "Design Out Crime" initiative to provide a Project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED) (see PDF PS-2). Design strategies within the Project design would include, but not limited to, the following:

- Secure access points would be limited and located in areas of high visibilities;
- Hallways and corridors would be straight forward with no dark corners, as possible;
- Outdoor areas would be exposed to windows and allow for natural surveillance;
- Clear transitional zones would be provided between public, semi-public and private spaces;
- Access key cards and cameras would be used; and
- Interior and exterior spaces would be well lit with proper signage to direct flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a 24-hour security camera network throughout the underground and above-grade parking structure; the elevators; the common and
- amenity spaces; the lobby areas; and the rooftop and ground level outdoor open spaces;

- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed;

- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user;

- Training employees on sound security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and monitoring the property; and

- Access to commercial uses would be unrestricted during business hours, with public access discounted after businesses have closed.

Although Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area, due to the Project Site's very close proximity to the Olympic Community Police Station, approximately 0.75 miles south, emergency response times are not expected to substantially increase. As identified in Section 16, Transportation and Circulation, operational traffic impacts would be less than significant. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Per Mitigation Measure HAZ-1, the Project would also develop an emergency response plan. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site. Finally, the Project would provide adequate access for emergency vehicles to the Project Site subject to the approval of the LAPD. Accordingly, impacts associated with emergency response times and emergency access are considered less than significant.

Overall, given the incremental change to the population served by the West Bureau created by the Project, , the Project's planned on-site security measures, and that LAPD has no known or proposed plans to expand their police facilities serving the Project area, the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the project such that it would require construction of new police facilities. Even if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Project area is highly developed, and the site of a police station or expansion of a police station would likely be on an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional police protection services as part of

an unplanned police station at this time is not an environmental impact that the project is required to mitigate.

Based on the above, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of police facilities are considered less than significant.

Project Design Features

PDF PS-1 Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF PS-2 The Project plans would incorporate 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. The design would consider guidelines per the "Design out Crime Guidelines: Crime Prevention Through Environmental Design" published by the Los Angeles Police Department's Crime Prevention Section (located at Parker Center, 150 N. Los Angeles Street, Room 818, Los Angeles, (213) 485-3134. These measures would be approved by the LAPD prior to issuance of building permits.

c. Schools?

Less Than Significant Impact. The Project would be served by the Los Angeles Unified School District (LAUSD). The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 31 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education to a total of 643,493 students with a total enrollment of 732,833 students when including adult education, enrolled throughout 1,274 schools and centers, including: 19 primary school centers, 452 elementary schools, 83 middle schools, 98 senior high schools, 54 option schools, 42 magnet schools, 22 multi-level schools, 12 special education schools, one center for advanced transition, one home/hospital, 156 K-12 magnet centers (on regular campuses), 211 charter schools, three other schools and centers, 10 community adult schools, one regional/occupational centers/program, 23 alternative education work centers, and 86 early education centers.[92]

92 LAUSD, Fingertip Facts 2015-2016 http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/32/Fingertip%20Facts15-16_final-updated.pdf, accessed June 2016.

LAUSD is currently divided into six local districts (Central, East, Northeast, Northwest, South, West), with the Project Site being located in the Local District Central.[93] The Project Site is located within the attendance boundaries of the Ambassador Elementary School of Global Education, Young Oak Kim Academy Middle School, and Los Angeles High School of the Arts. Amongst the various elementary schools located within the Project area, the Ambassador Elementary School of Global Education is located nearest the Project Site. The Ambassador Elementary School of Global Education, kindergarten through fifth grade (K-5), is located at 3201 West 8th Street, approximately 0.25 miles southwest of the Project Site. The Young Oak Kim Academy Middle School, (grades 6-8), is located at 615 Shatto Place, approximately 0.14 miles northeast of the Project Site. The Los Angeles High School of the Arts (grades 9-12), is located at 701 S. Catalina Street, approximately 0.18 miles west of the Project Site.

Construction of the Project would require construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocated residences within this region or move from other regions as a result of their work on the Project. Therefore, Project construction would not generate a significant amount of new students needing to attend local schools.

There are no schools located adjacent to the Project Site that would be affected by construction activities occurring at the Project Site. The nearest schools to the Project Site, listed above, are separated by intervening development. There would be no Project-related construction staging or road closures at or adjacent to these schools. Therefore, construction activities would not cause significant adverse impacts to the operations of nearby schools.

Project operation would incrementally increase demand for school services. The estimated 1,308 persons increase in the City of Los of Los Angeles' population would represent a nominal 0.03 percent increase in the City's existing population. Because the Project would replace existing offices and commercial uses, it would reduce total employees and, thus, result in an indirect population decrease associated with employment. If new employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some new employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be negligible change in student population in the nearby schools. The Project is estimated to generate 92 elementary school students, 26 middle school students, and 18 high school students for a total of 136 students.[94]

93 Los Angeles Unified School District, Local Districts Map, 2015, http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/34/LocalDistricts_LetterSize.png, accessed June 2016.

94 Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multi-family residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303. Student generation rates for hotel, office, retail, and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27,

Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Sections 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation under CEQA for impacts to school facilities. Therefore, operational impacts to school services and facilities would be less than significant.

d. Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. Currently, the LADRP maintains over 15,000 acres of parkland within approximately 400 neighborhood and regional parks. In addition to parkland, the LADRP operates 184 recreation centers, 61 swimming pools, 11 lakes, seven camps, more than a dozen museums and historic sites, and hundreds of programs for youth, senior, physically disabled and volunteers.[95]

The adequacy of parkland is typically measured in terms of acres of parkland per 1,000 residents.[96] The City has an estimated existing City-wide ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents, which is below the Citywide goals set forth in the Public Recreation Plan (PRP) of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two acres each of neighborhood and community parkland per 1,000 persons in the long-term.[97] The Wilshire Community Plan Area has a parkland acres-to-population ratio of neighborhood and community parks of 0.23 acres per 1,000 residents.[98]

The Project area is served by several public parks. The following LADRP facilities are less than 10 acres in size and classified as neighborhood parks located within a one-mile radius of the Project site: Echo Deep Pool, a 2.07-acre facility, located at 1419 Colton Street; Francis Avenue Community Garden, a 0.15-acre park, located at 2909 W. Francis Avenue; Shatto Recreation Center, a 5.45-acre park, located at 3191 W. 4th Street; and Seoul International Park, a 3.47-acre park, located at 3250 W. San Marino Avenue.[99] The following LADRP facilities are between 10 and 50 acres in size and classified as community parks located within a two-mile radius of the

2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

95 Los Angeles Department of Recreation and Parks website, "Who We Are". http://www.laparks.org/dos/dept/who.htm. Accessed June 2016.

96 City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

97 City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

98 Michael A. Shull, General Manager, and Ramon Barajas, Assistant General Manager, Planning, Construction, and Maintenance Branch, Los Angeles Department of Recreation and Parks, letter correspondence, dated July 21, 2016.

99 Ibid.

Project site: Echo Park, a 28.41-acre park, located at 751 Echo Park Boulevard; Lafayette Park, a 10-acre park, located at 4800 W. Hollywood Boulevard; and MacArthur Park, a 29.87-acre park located at 2230 W. 6th Street.[100] While data regarding the level of use for the parks and recreational facilities that serve Project Site are not available, parks within the City are heavily utilized and often overburdened. The City is currently in the process of developing and preparing a master plan for the MacArthur Park and to evaluate the water quality and provide recommendations for improvements at the MacArthur Park Lake.[101]

According to the LADRP, the Project would create additional demand on the use of parkland in the Project vicinity.[102] According to the Project's estimated population increase of 1,308 persons, the Project would result in a demand for approximately 56,976 square feet of park space or 2.6 acres to meet the City's neighborhood and community parkland standards for the short/intermediate term and 5.2 acres to meet the City's neighborhood and community parkland long-term standards.

LAMC Section 12.21.G requires that open space be provided with the development of residential uses. **Table B-20**, *Project Open Space Requirements*, illustrates the approximated amount of open space that would be required according to unit types. As shown in Table B-20, the Project must provide a minimum of 59,600 square feet of open space, which may include recreational facilities and amenities.

TABLE B-20
PROJECT OPEN SPACE REQUIREMENTS

Proposed Residential Units	Quantity	Factor (sq. ft/unit)[a]	Open Space Requirement (sq. ft.)
Studio	196	100	19,600
One Bedroom	145	100	14,500
One Bedroom + Den	102	125	12,750
Two Bedroom	102	125	12,750
Total:	**545**		**59,600**

[a] Factors based on LAMC Section 12.21.G

SOURCE: ESA PCR, 2016.

The Project's proposed recreational amenities are summarized in **Table B-21**, *Summary of Project Recreational Amenities*, below. As shown in Table B-21, the Project would provide 61,425 square feet (1.41 acres) of recreational amenities that would be tailored to meet the needs of the anticipated residential population. Enclosed amenities would include gym/fitness, media room, club/recreational spaces, etc. Because of the Project's smaller units sizes which may reduce the incidence of larger families and the recreational character of the provided open space, it is expected that the majority of the Project's recreational demand would take place within the

100 Ibid.
101 Ibid.
102 Ibid.

Project Site. Residual off-site park use would likely be dispersed to a large number of parks, including large regional facilities such as Griffith Park. Beyond that, park visits would likely be allocated to parks serving the Project area that would be easily accessible and which have unique features that would be of interest to different residents.

TABLE B-21
SUMMARY OF PROJECT RECREATIONAL AMENITIES

Recreation and Open Space Type	Square Feet
Open Space Common	
Courtyard (Mid-Rise)	3,464
Roof Deck with Pool (Mid-Rise)	8,265
Roof Deck with Pool (High-Rise)	15,420
Pet Park	1,887
Open Space Private	
Balconies (Mid-Rise)	1,750
Balconies (High-Rise)	15,200
Enclosed Amenities	
Mid-Rise	2,572
High-Rise	12,887
Total	**61,425**

SOURCE: Archeon Group, June 2016.

It is, thus, anticipated that impacts at any single park location would be negligible and the Project contribution to park use would not cause substantial degradation of existing facilities or require a new public park.

Section 17.12 and Section 12.33 of the LAMC, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density at which the land may or will be developed. With 545 units, the Project would have approximately 255 units per acre. Pursuant to Section 17.12 the maximum dedication is required for projects with more than 100 dwelling units and is equal to 32 percent of the gross subdivision area. Therefore, the dedication required for this Project would be approximately 32 percent of 2.14 acres, or approximately 0.68 acres, unless in-lieu fees were paid. As mentioned above, Section 17.12 F of the LAMC allows private recreational areas developed within a project site for use by the Project's residents to be credited against the Project's land dedication and/or in lieu fee requirement. As described above, the Project proposes to include 61,425 square feet (1.41 acres) of recreational/amenity spaces, which exceeds the 0.68-acre dedication that may otherwise be required under Section 17.12 of the LAMC.

Although it is anticipated that the Project would comply with Section 17.12 of the LAMC, the finalized Project design would be reviewed by the Department of City Planning to determine

whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.

e. Other governmental services?

Less Than Significant Impact. The City of Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The LAPL system provides library facilities and services to the Project Site and the City of Los Angeles. The LAPL consists of the Central Library, eight regional branches, and 64 community branches, with a multimedia inventory of over 6.5 million items and 2,600 computer workstations with access to the internet and electronic databases. All branch libraries provide free access to computer workstations that are connected to the LAPL's information network. In addition to providing internet access, these workstations enable the public to search LAPL's electronic resources including the online catalog, over 100 subscription databases, word processing, language learning, literacy, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish-speaking patrons. The LAPL is a member of the Southern California Library Cooperative (SCLC). SCLC is an association of 38 independent city and special district public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this program enables mutual loan privileges and allows member libraries to receive compensation for such use. [103]

The LAPL service populations are based on the number of people residing in census tracts that are assigned to (i.e., served by) a specific library. The Project Site is served by the Felipe de Neve Branch Library, Pio Pico Koreatown Regional Branch Library, Pico Union Branch Library, Wilshire Branch Library, and the Echo Park Branch Library. **Table B-22**, *Libraries Located in the Vicinity of the Project Site*, above, provides information regarding these libraries, including their distance/direction from the Project Site, size, population served, and hours of operation.

The Project's construction workers would come from an existing labor pool whose workers move between construction projects on short-term bases without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such stops would increase library use at one location while reducing it at another. Such variations would occur on short-term bases. Therefore, there would be no notable increase in library usage at the libraries serving the Project Site.

[103] Los Angeles Public Libraries, About the Library. http://www.lapl.org/about-lapl/press/central-facts., accessed June 2016.

TABLE B-22
LIBRARY FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE

Library	Distance/ Direction from Project Site[a]	Size in Square Feet	Service Population	Hours of Operation
Felipe de Neve Branch Library 2820 W. 6th Street Los Angeles, CA 90057	0.50 miles northeast	9,273	119,340	10:00 A.M. to 8:00 P.M. Mon. & Wed. 12:00 P.M. to 8:00 P.M. Tue. & Thurs. 9:30 A.M. to 5:30 P.M. Fri. & Sat. Closed Sun.
Pio Pico Koreatown Regional Branch Library 694 S. Oxford Avenue Los Angeles, CA 90005	0.80 miles east	20,000	253,807	10:00 A.M. to 8:00 P.M. Mon. & Wed. 12:00 P.M. to 8:00 P.M. Tue. & Thurs. 9:30 A.M. to 5:30 P.M. Fri. & Sat. Closed Sun.
Pico Union Branch Library 1030 S. Alvarado Street Los Angeles, CA 90006	1.00 miles southeast	12,500	140,640	10:00 A.M. to 8:00 P.M. Mon. & Wed. 12:00 P.M. to 8:00 P.M. Tue. & Thurs. 9:30 A.M. to 5:30 P.M. Fri. & Sat. Closed Sun.
Wilshire Branch Library 149 N. St. Andrews Place Los Angeles, CA 90044	1.38 miles northwest	6,258	107,838	10:00 A.M. to 8:00 P.M. Mon. & Wed. 12:00 P.M. to 8:00 P.M. Tue. & Thurs. 9:30 A.M. to 5:30 P.M. Fri. & Sat. Closed Sun.
Echo Park Branch Library 1410 West Temple Street Los Angeles, CA 90026	2.00 miles northeast	17,543	111,188	10:00 A.M. to 8:00 P.M. Mon. & Wed. 12:00 P.M. to 8:00 P.M. Tue. & Thurs. 9:30 A.M. to 5:30 P.M. Fri. & Sat. Closed Sun.

[a] Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.

SOURCE: ESA PCR, 2016

The nearest library to the Project Site is the Felipe de Neve Branch Library, located 0.50 miles northeast from the Project Site, separated from the Project by intervening development. There would be no Project-related construction staging or road closures at or adjacent to the Felipe de Neve Branch Library. Therefore, construction activities would not adversely affect the operations of nearby libraries.

To address potential impacts to libraries, the Project Applicant would pay the required fees per the Developer Fee Program per City and LAPL requirements. Also, the Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. The above fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from the Project. As such, impacts regarding library services would be less than significant.

The Project's residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, implementation of the Project would result in a nominal population increase compared to the overall population that utilizes local roadways, and which would be consistent with anticipated projections envisioned for the Project area. Therefore, development of the Project would not significantly increase the use of

government services beyond currently levels. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. The Project Applicant would need to pay all applicable impact fees of the City of Los Angeles. Overall, less than significant impacts to governmental services, including roads, would occur.

15. Recreation

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

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-b). As discussed under Response No. 14.d, operational activities associated with the Project would increase demand for park services. However, the Project would provide 61,425 square feet (1.41-acre) of recreational amenities that would be tailored to meet the needs of the anticipated residential population. The Project would provide open space features that exceed the City's open space requirements. As such, the demand or use of nearby park facilities would be reduced at times by the Project. Nonetheless, to offset the Project's demand on park facilities and services, the Project applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Section applicable LAMC requirements, as necessary. Therefore, with the proposed open space features and payment of applicable fees, the Project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant in this regard.

16. Transportation/Circulation

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?

Less Than Significant Impact. The Project would result in the development of 545 residential units, 5,102 square feet of commercial, and a 160-room hotel. The hotel includes restaurants, bars, a spa, pool deck, and other amenities. The Galleria Building is currently occupied by restaurant, office, and spa uses. The Project would increase the development intensity on the

Project Site, including a new residential population at the Project Site compared to existing conditions. Thus, the Project would result in an increase in daily and peak-hour traffic within the traffic study area.

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. However, because the existing Galleria Building would be closed during construction and would not generate trips, the subtraction of existing trips from construction trips would result in a minimal or no net increase. As such, construction activities are expected to have a less than significant impact on street and intersection service levels.

Once construction is complete, the Project's residents, employees, and visitors would generate daily vehicle and transit trips that could affect the existing capacity of the street system. Potential traffic impacts are addressed in detail in the *Traffic Impact Analysis* or "Traffic Study" (Overland Traffic Consultants, Inc., June 2016) contained in Appendix K of this MND. The Traffic Study was reviewed and approved by the City of Los Angeles Department of Transportation (LADOT), as discussed in the LADOT Approval Letter (July 2016) contained in Appendix K of this MND.

Twelve signalized study intersections were selected for the Project traffic analysis. Level of Service (LOS) is a qualitative measure used to describe traffic flow conditions, which range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F. The definitions of the LOS levels and their related V/C ratio for signalized intersections are shown in **Table B-23**, *Level of Service Definitions for Signalized Intersections*. The12 intersections and respective LOS are summarized in **Table B-24,** *Existing Conditions Signalized Intersection Levels of Service*.

As shown in Table B-24, the majority of study intersections currently operate at LOS C during the A.M. and P.M. peak hours. The exceptions are the intersection of Vermont Avenue/Wilshire Boulevard, which operates at LOS E during the A.M. and P.M. peak hours, and the intersection of Vermont Avenue/Olympic Boulevard which operates at LOS D during the A.M. and P.M. peak hours. Procedures and methodology are described in detail in the Traffic Study.

As detailed in **Table B-25**, *Estimated Project Traffic Generation*, the Project is anticipated to generate a total of 1,353 net new trips on a typical weekday, including 188 net new morning peak hour trips (15 inbound, 173 outbound) and 112 net new afternoon peak hour trips (89 inbound, 23 outbound).

TABLE B-23
HIGHWAY CAPACITY MANUAL LEVEL OF SERVICE FOR DEFINITIONS FOR SIGNALIZED INTERSECTIONS

Level of Service	Description	Seconds of Delay
A	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.	<10
B	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	> 10 and < 20
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	> 20 and < 35
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	> 35 and < 55
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	> 55 and < 80
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 80

SOURCE: 2010 Highway Capacity Manual (Transportation Research Board, 2010) and Caltrans

TABLE B-24
LEVEL OF SERVICE FOR EXISTING CONDITIONS

No	Intersection	Peak Hour	CMA	LOS
1	Catalina Avenue &	AM	0.706	C
	Wilshire Boulevard	PM	0.715	C
2	Berendo Street &	AM	0.566.	C*
	Wilshire Boulevard	PM	05.72	C*
3	6th Street &	AM	0.586	C*
	New Hampshire Avenue	PM	0.626	C*
4	New Hampshire Avenue	AM	0.643	C*
	& Wilshire Boulevard	PM	0.696	C*
5	7th Street &	AM	0.511	C*
	New Hampshire Avenue	PM	0.443	C*
6	8th Street &	AM	0.606	C*
	New Hampshire Avenue	PM	0.569	C*
7	6th Street &	AM	0.789	C
	Vermont Avenue	PM	0.691	C*
8	Vermont Avenue &	AM	0.956	E
	Wilshire Boulevard	PM	0.913	E
9	7th Street &	AM	0.625	C*
	Vermont Avenue	PM	0.668	C*
10	8th Street &	AM	0.739	C
	Vermont Avenue	PM	0.688	C*

No	Intersection	Peak Hour	CMA	LOS
11	Olympic Boulevard &	AM	0.891	D
	Vermont Avenue	PM	0.852	D
12	7th St/La Fayette PK &	AM	0.729	C
	Hoover Street	PM	0.699	C*

* The LOS was manually adjusted up to reflect higher observed operation levels. During field inspection, the intersection was found to be occasionally delayed due to upstream traffic creating lower count volumes through the intersection.

SOURCE: Overland Traffic Consultants, Traffic Impact Analysis for 3240 Wilshire, June 2016

TABLE B-25
ESTIMATED PROJECT TRAFFIC GENERATION

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed								
Hotel[a]	162 rooms	1324	86	51	35	97	50	47
Transit/Walk	25%	(331)	(21)	(13)	(8)	(24)	(12)	(12)
Subtotal Hotel		993	65	38	27	73	38	35
Condominiumt[b]	545 units	3624	278	56	222	338	220	118
Transit/Walk	25%	(906)	(69)	(14)	(55)	(84)	(55)	(29)
Subtotal Condominium		2718	209	42	167	254	165	89
Shopping Center[c]	5,222 sf	2718	209	42	167	254	165	89
Internal Trips	10%	(22)	(1)	(0)	(1)	(2)	(1)	(1)
Transit/Walk	25%	(50)	(1)	(1)	(0)	(4)	(2)	(2)
Pass-By	10%	(15)	(0)	(0)	(0)	(1)	(1)	(0)
Subtotal Retail		135	3	2	1	12	4	8
Subtotal Proposed		3,846	277	**82**	**195**	**339**	**207**	**132**
Removal of Existing								
Office	26,008 sf	287	41	36	5	39	7	32
Transit/Walk	25%	(72)	(10)	(9)	(1)	(10)	(2)	(8)
Subtotal Office		215	30	27	3	29	5	24
Medical Office	10,314 sf	373	25	19	6	37	10	27
Transit/Walk	25%	(93)	(6)	(5)	(1)	(9)	(3)	(6)
Pass-By	10%	(28)	(2)	(1)	(1)	(3)	(1)	(2)
Subtotal Medical Office		252	17	13	4	25	6	19
Quality Restaurant	22,475 sf	2,022	18	15	3	168	113	55
Internal Trips	10%	(202)	(2)	(2)	(0)	(17)	(11)	(6)
Transit/Walk	25%	(455)	(4)	(3)	(1)	(38)	(26)	(12)
Pass-By	10%	(136)	(1)	(1)	(0)	(11)	(8)	(3)

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Subtotal Quality Restaurant		1228	11	9	2	102	68	34
High Turnover Restaurant	1,823 sf	232	20	11	9	18	11	7
Internal Trips	10%	(23)	(2)	(1)	(1)	(2)	(1)	(1)
Transit/Walk	25%	(52)	(4)	(2)	(2)	(4)	(2)	(2)
Pass-By	20%	(31)	(3)	(2)	(1)	(2)	(1)	(1)
Subtotal High Turnover Rest		125	11	6	5	10	7	3
Retail	19,524 sf	834	19	12	7	72	35	37
Internal Trips	10%	(83)	(2)	(1)	(1)	(7)	(3)	(4)
Transit/Walk	25%	(188)	(4)	(2)	(2)	(16)	(8)	(8)
Pass-By	10%	(56)	(1)	(1)	(0)	(5)	(2)	(3)
Subtotal Shopping Center		506	12	8	4	44	22	22
Spa [d]	22,475 sf	247	11	5	6	26	15	11
Internal Trips		(25)	(1)	0	(1)	(3)	(2)	(1)
Transit/Walk		(56)	(2)	(1)	(1)	(6)	(3)	(3)
Subtotal Spa		167	8	4	4	17	10	7
Vacant Retail	26,138 sf	0	0	0	0	0	0	0
SUBTOTAL Existing	**128,757 sf**	**2,493**	**89**	**67**	**22**	**227**	**118**	**109**
NET Project		**1,353**	**188**	**15**	**173**	**112**	**89**	**23**

[a] Renovation of Existing 128,757 sf Building with potential sf added to rooftop and square footage removed from courtyard for the hotel component and its ancillary restaurant and spa uses.
[b] 190 units in mid-rise building and 355 units in high-rise building
[c] 2,390 sf of ground floor retail in mid-rise building and 2,832 sf of ground floor retail in high-rise building
[d] No ITE rate available for spa, 1/3 health club as similar arrival/departure but less intense use

SOURCE: Overland Traffic Consultants, Traffic Impact Analysis for 3240 Wilshire, June 2016.

The Project would have a significant impact on intersection service levels if it would increase V/C ratios or delay above LOS standards set forth under LADOT guidelines. Under LADOT guidelines, a significant impact would occur if an increase in V/C value of more than 0.040 occurred under LOS C conditions; an increase in V/C value of more than 0.020 occurred under LOS D conditions; and an increase in V/C value of more than 0.010 occurred under LOS E and F conditions.

Future 2020 traffic volumes were developed to evaluate traffic conditions after completion of other planned related projects and the Project. These future traffic conditions include traffic volumes from related projects (approved or pending projects expected to be built by the year 2020 in the project vicinity) added to existing traffic conditions, plus 1% ambient growth in traffic per year to simulate future traffic conditions with expected new growth in development in the area.[104] Net traffic increases under future (2020) conditions take into consideration a 15%

[104] Traffic volumes for the related projects are included in Table 9 of the Traffic Study.

reduction to account for multi-modal and Transportation Management Plan (TDM) measures (see PDF TRAF-1, below). Future traffic conditions representing the buildout conditions at the completion of the Project are illustrated in **Table B-26** *Future (2020) Traffic Conditions with Project.*

TABLE B-26
FUTURE (2020) TRAFFIC CONDITIONS WITH PROJECT

		Future (2020) Without Project		Future (2020) With Project			
No Intersection	**Peak Hour**	**CMA**	**LOS**	**CMA**	**LOS**	**IMPACT**	**Significant Impact**
1 Catalina Avenue &	AM	0.830	D	0.831	D	+ 0.001	NO
Wilshire Boulevard	PM	0.846	D	0.849	D	+ 0.003	NO
2 Berendo Street &	AM	0.061	C*	0.662	C*	+ 0.001	NO
Wilshire Boulevard	PM	0.685	C*	0.688	C*	+ 0.003	NO
3 6th Street &	AM	0.669	C*	0.677	C*	+ 0.008	NO
New Hampshire Avenue	PM	0.723	C	0.729	C	+ 0.006	NO
4 New Hampshire Avenue	AM	0.752	C	0.765	C	+ 0.013	NO
& Wilshire Boulevard	PM	0.826	D	0.837	D	+ 0.011	NO
5 7th Street &	AM	0.568	C*	0.612	C*	+ 0.044	YES
New Hampshire Avenue	PM	0.507	C*	0.513	C*	+ 0.006	NO
6. 8th Street &	AM	0.795	C	0.809	D	+ 0.014	NO
New Hampshire Avenue	PM	0.699	C*	0.707	C	+ 0.008	NO
7 6th Street &	AM	0.899	D	0.908	D	+ 0.009	NO
Vermont Avenue	PM	0.807	D	0.808	D	+ 0.001	NO
8 Vermont Avenue &	AM	1.097	F	1.103	F	+ 0.006	NO
Wilshire Boulevard	PM	1.079	F	1.087	F	+ 0.008	NO
9 7th Street &	AM	0.700	C*	0.713	C	+ 0.013	NO
Vermont Avenue	PM	0.753	C	0.767	C	+ 0.014	NO
10 8th Street &	AM	0.853	D	0.866	D	+ 0.013	NO
Vermont Avenue	PM	0.808	D	0.815	D	+ 0.007	NO
11 Olympic Boulevard &	AM	0.988	E	0.995	E	+ 0.007	NO
Vermont Avenue	PM	0.971	E	0.977	E	+ 0.006	NO
12 7th St/La Fayette Pk &	AM	0.846	D	0.853	D	+ 0.007	NO
Hoover Street	PM	0.850	D	0.854	D	+ 0.001	NO

* The LOS was manually adjusted up to reflect higher observed operation levels. During field inspection, intersection was found to be occasionally delayed due to upstream traffic creating lower count volumes through the intersection.

SOURCE: Overland Traffic Consultants, Traffic Impact Analysis for 3240 Wilshire, June 2016.

As shown in Table B-26, the impact levels would not exceed LOS threshold levels at any of the study intersections. Although the intersection of Vermont Avenue/Wilshire Boulevard is anticipated to operate at failed LOS F, the Project would not exceed the threshold level of 0.010 at the intersection and, thus, would not be considered to generate a significant impact.

For information purposes, the Traffic Study indicated that the Project would exceed the significance threshold at the intersection of 7th Street/ New Hampshire Avenue during the A.M. peak hour under existing (2016) conditions (Traffic Study, Table 7). As discussed therein, this would be mitigated to a less than significant level. However, because the Project in reality would not be constructed and occupied in the current year (under Existing with Project conditions), this mitigation would not be necessary. As previously stated, under future traffic conditions, which reflect ambient growth, related projects, and TDM/transit reductions, the Project would not exceed threshold levels. The applicant-proposed TDM program is included in PDF TRAF-1, below, to further ensure implementation. Therefore, because the Project would not exceed LOS threshold levels under future buildout conditions, impacts on intersection service levels that were established to measure the effectiveness for the performance of the circulation system would be less than significant.

Project Design Features

PDF TRAF-1 The Applicant shall prepare a detailed Transportation Management Plan that will detail Project traffic reduction measures for the commercial, hotel and residential components of the Project. Components of the Plan shall include:

1. Improve the existing bus stops at the northwest and southwest corners of Wilshire Boulevard/ Vermont Avenue; and at the east, north, and south sides of Vermont Avenue/ 7th Street by providing weather protected covered benches.

2. Highlight the multiple transit and cycling opportunities in the immediate area within the hotel area to promote alternates to vehicle transportation. Items such as a kiosk, flyers and concierge service shall be utilized to promote these opportunities.

3. Provide an on-site TDM manager to assist in matching rideshare partners, determining transit routes, and promoting TDM program.

4. Provide access pass and transit pass reductions for residents and employees of the commercial retail and hotel venues.

5. Provide a visible on-site kiosk with options for ridesharing, bus routes, bike routes in a prominent area(s) in view for residents, employees and patrons of the hotel and retail commercial components.

6. Provide car sharing service for residents and/or commercial employees that rideshare.

7. Provide bicycle sharing service for residents and/or commercial employees use.

8. Provide some commercial components that are neighborhood serving and easily accessible and visible to the major streets to encourage walking as an alternative to single occupant vehicles.

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?

Less Than Significant Impact. The Congestion Management Program (CMP) was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all State highways and some arterials within the County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to comply with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of State gas tax funding.

Under the CMP, an increase in the freeway volume by 150 vehicles per hour during the A.M. or P.M. peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2 percent in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the A.M. or P.M. peak hour requires further analysis.

The intersection of Alvarado Street and Wilshire Boulevard, located approximately 0.75 mile from the Project Site, is the nearest CMP intersection. Based on the distribution of Project trips, up to 10 percent of the Project traffic could be going through this intersection. This would amount to approximately 19 trips during the A.M. peak hour and 11 trips during the P.M. peak hour. This is below the threshold for 50 peak hour trips for a potential CMP intersection impact. Construction activities would also be far below the CMP significance levels, with most trips occurring during non-peak traffic hours.

The Project is geographically centered between the Hollywood Freeway, the Harbor Freeway and the Santa Monica Freeway and the Project's vehicle trips are anticipated to be dispersed throughout the freeway system. Based on trip distribution patterns in the area, the Project's access and proximity to destination points throughout the City, it is anticipated that up to 10 percent of the Project volumes would be using any one segment of the freeway. The maximum number of freeway trips on any of the freeways would then be 19 vehicles during the peak hours. Because this amount of traffic is below the threshold needed for further evaluation, the Project is considered to have a less than significant impact with respect to CMP intersections or freeways.

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?

Less Than Significant Impact. The Project Site is not located within the vicinity of a private or public airport or planning boundary of an airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. The Project would be a maximum height of 395 feet to the top of the architectural projection and would be required to comply with the Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures pursuant to Chapter 2, Section 2.1 Structures to be Marked and Lighted, of

the Obstruction Marking and Lighting Guidelines.[105] This requires any temporary or permanent structures or appurtenances that exceed an overall height of 200 feet above ground level to be normally marked and/or lighted. The FAA may opt to perform an aeronautical study to determine that the absence of marking and/or lighting would not impair aviation safety. In general, commercial outside lighting should not be used in lieu of FAA-recommended marking and/or lighting. Compliance with applicable regulations would ensure that impacts related to a change in air traffic patterns would be less than significant.

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

Less Than Significant Impact. The Project Site is currently served by two driveways off New Hampshire Avenue. Although the Site has access to the adjacent alley, the existing parking configuration prevents alley access. The alley is currently available for loading, such as trash and deliveries. The Project would be served by the four driveways locations shown in Attachment A, Figure A-5, Ground Floor Plan, in this MND. These include three driveways on New Hampshire Avenue and one on 7th Street. The existing north driveway on New Hampshire Avenue and the alley would provide access to the Hotel motor court and to the parking structure used by the hotel and residents of the mid-rise building. Driveway access for the mid-rise building would also be provided via a new driveway on New Hampshire Avenue. Driveway access for the high-rise building would be provided via the existing south driveway and a new driveway on 7th Street. This would provide two access points for each of the hotel, mid-rise, and high-rise uses. The addition of driveways would avoid concentration of Project ingress and egress traffic at a single point. Two access driveways per use would allow the Project flexibility to limit driveway/street turns to right-turn only, if necessary. However, under anticipated trip distribution, the need for right-turn only to/from Wilshire Boulevard, 7th Street, and New Hampshire Avenue are not indicated.

Driveways would be set back from the adjacent Wilshire Boulevard/New Hampshire Avenue and 7th Street/New Hampshire Avenue intersections and are not anticipated to interfere with through or turning traffic at these locations. None of the driveways would require signalization.

The Project would focus driveway access on New Hampshire Avenue as under the existing configuration, with only part of one use directly accessing 7th Street. Hotel and residential traffic would be distributed among several access points to avoid concentrations of vehicles at a single point. Also, the Project would set back driveway access points from the intersections. For these reasons, the Project would not substantially increase roadway hazards. Therefore, impacts related to roadway hazards would be less than significant.

e. Result in inadequate emergency access?

Less than Significant Impact. The Project would be required to meet all applicable local and State regulatory standards for adequate emergency access. According to the Safety Element of the

[105] Federal Aviation Administration (FAA), Obstruction Marking and Lighting, December 2015.

Los Angeles General Plan, the Project Site is located along a selected disaster route, Wilshire Boulevard, and near a selected disaster route, Vermont Avenue.[106] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities, such as utility relocations, sideway reconstruction, delivery of materials for certain construction procedures or temporary staging, may occur in adjacent street rights-of-way and potentially require temporary lane closures. It is expected that these would occur more on New Hampshire Avenue and would avoid Wilshire Avenue. However, any temporary lane closures have the potential to disrupt emergency access to the Project Site and the surrounding areas. Project implementation would include preparation of a Construction Traffic Management Plan, which would minimize short-term conflicts with emergency access. In addition, the Project would be required to prepare a parking and driveway plan subject to review and approval by LADOT and/or the Bureau of Engineering that provides code-required emergency access. With implementation of a Construction Management Plan and having all access points designed to meet City-required emergency access standards, impacts would be less than significant.

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?

Less Than Significant Impact.

Bicycle Plans and Programs

The City of Los Angeles adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. The City of Los Angeles Mobility Plan 2035 identifies a Bicycle Enhanced Network. The Mobility Plan 2035 indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. The plan entails roadways be improved with bike detectors at actuated signals. Wilshire Boulevard is identified as a Tier 2 bicycle lane and Vermont Avenue is identified as a Tier 3 bicycle lane. The Project would not add new driveways or alter rights of way along Wilshire Boulevard and, as such, would not interfere with the City's bicycle route along this street. Therefore, the Project would be consistent with the City's Bicycle Master Plan.

As shown in **Table B-27,** *Los Angeles Municipal Code Required Bicycle Parking*, Municipal code 12.21 A.16(a)(2) requires that new projects provide bicycle parking spaces, including one short-term and one long-term space per 20 guest rooms and one short term and one long term bicycle space per 2,000 square feet of commercial floor area. Multi-family residential requires one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. The Project would meet the LAMC requirement of 79 short-term and 570 long-term bicycle

[106] City of Los Angeles, General Plan Safety Element, Exhibit H Critical Facilities and Lifeline Systems, 1996.

spaces shown in Table B-27. Because the Project would comply with bicycle requirements of the City's code, it would be consistent with pertinent regulations related to bicycles.

TABLE B-27
LOS ANGELES MUNICIPAL CODE REQUIRED BICYCLE PARKING

Land Use	Size	1 short- and 1 long-term space per 20 rooms	Number of Short-Term Spaces Required	Number of Long-Term Spaces Required
Hotel	160 rooms	1 short- and 1 long-term space per 20 guest rooms	8	8
Residential	545 rooms	1 short- and 1 long-term space per 2,000 square feet	55	545
Retail	5,222 square feet	1 short- and 1 long-term space per 2,000 square feet	3	3
Hotel Spa & Restaurant	27,699 square feet	1 short- and 1 long-term space per 2,000 square feet	14	14
Total			**77**	**570**

SOURCE: Overland Traffic Consultants, 2016.

Transit Plans and Programs

A purpose of the City's Mobility Plan 2035 is to reduce vehicle trips, and through focusing growth in proximity to public transit and expanding mobility through better quality public transit. The Project Site is located within a designated Transit Priority Area and the Project would be consistent with the objectives of the Mobility Plan because of its proximity to the Red and Purple Line Metro Station at Vermont and Wilshire and through the provision of several transit improvements and supporting features. The Project's sidewalk orientation, direct sidewalk access to the Metro station, and signalized intersections at street corners would facilitate pedestrian access to the Metro station. In addition, the Project would encourage transit by providing weather resistant benches at bus stops on Wilshire Boulevard and 7th Street. It would also implement a Transportation Management Plan and several transit-supporting measures. With the implementation of the Transportation Management Plan, the Project would not have significant impacts with respect to the Mobility Plan 2035. However, to ensure that the Applicant would support transit and meet other objectives of the Mobility Plan 2035, this proposed component of the Project is as provided as a mitigation measure, below.

The 2010 CMP for Los Angeles County describes the statutory requirement for analyzing the regional transit system as a mechanism for reducing congestion, providing minimum performance measures for transit analysis, and reporting on the function and adequacy of the CMP transit network.[107] CMP 2008 guidelines provide a mechanism for estimating future transit demand associated with development projects. Estimated transit use is generated by multiplying a project's daily and peak hour vehicle trips by 1.4 (to determine person trips), then multiplying person trips by 3.5 percent. As shown in **Table B-28,** *Transit Trips*, the Project is forecast to generate a net gain of approximately 1,353 weekday vehicle trips, 1,894 person trips, and 66

[107] Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Chapter 3.

transit trips. As confirmed in the Traffic Study, this number of riders would not adversely affect the performance of the public transit system.

TABLE B-28
PROJECT TRANSIT TRIPS

	Daily	A.M. Peak Hour	P.M. Peak Hour
Project Trips	1,353	188	112
Person Trips	1,894	203	157
Transit Trips	66	9	5

SOURCE: Overland Traffic Consultants, 2016.

The objective of the CMP, the City's Mobility Element 2035, and City's Transit Priority Area designation is to increase transit use. The Project's Transit Priority Area designation is intended to concentrate new development in proximity to Metro portals to encourage greater ridership. Therefore, with the Project's proximity to the Red and Purple Line Metro Station, ridership from the Project is likely to be higher than CMP estimates. However, because of the Metro Line's high capacity, the Project is not expected to cause a decrease in the performance and safety of this public facility. The Project's combined mixed-use (hotel, commercial, and residential uses) would further encourage pedestrian activity around the Project Site, consistent with objectives of the Mobility Element 2035. Because the Project would be located in close walking distance (less than 300 feet) to the Metro Station, it would be consistent with the objectives of the CMP and City Mobility Element 2035. Impacts with respect to transit would be less than significant.

Parking

The Project's parking program is discussed in detail in Attachment A, Table A-2, Summary of Required and Provided Vehicle and Bicycle Parking, of this MND. As described therein, the Project would be required under Code Sec. 12.21.A4, Sec. 12.22.A.25, and 12.22.A.25(d) to provide 686 total parking spaces. The Project would provide 717 spaces and, as such, would be consistent with Code requirements. Impacts related to parking would not be significant.

17. Utilities and Service Systems

The following impact analysis pertaining to utilities and service systems includes information contained in the Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on June 13, 2016; the Service Advisory Request (SAR) approved by the Los Angeles Department of Water and Power on June 7, 2016; Memorandum: 3240 Wilshire Boulevard, Los Angeles, CA – Wastewater, prepared by Psomas, dated May 5, 2016; Memorandum: 3240 Wilshire Boulevard, Los Angeles, CA – Domestic Water, prepared by Psomas, dated May 5, 2016; and the Water Supply Assessment (WSA) prepared by the Los Angeles Department of Water and Power (DWP), dated September 7, 2016. The above referenced documents are included in Appendix L of this MND.

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

and

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?

Wastewater

Less Than Significant Impact. As discussed in Section 9, *Hydrology and Water Quality*, under the NPDES permit from the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City of Los Angeles are subject to applicable local, State and/or Federal regulations. The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. Therefore, implementation of the Project would not result in an exceedance of wastewater treatment requirements.

The City of Los Angeles Department of Public Works provides wastewater services for the Project Site. The Project Site is within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Wastewater discharges from the Project would be treated at the HTP. Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and a five-mile outfall pipeline). HTP effluent is required to meet the LARWQCB requirements for a recreational beneficial use, which impose performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HTP is required to comply with associated WDRs and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs would ensure that Project implementation would not exceed the applicable wastewater treatment requirements of the LARWQCB with respect to discharges to the sewer system. As such, impacts would be less than significant in this regard.

During Project construction, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is

not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

Existing sewer lines within the City of Los Angeles are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. Existing sewer infrastructure within the City of Los Angeles adjacent the Project Site includes an 8-inch sewer main that drains east to west along the street centerline of Wilshire Boulevard; an 8-inch sewer line that drains north to south along the street centerline of New Hampshire Avenue, which transitions into a 10-inch line north of the intersection of New Hampshire Avenue and 7th Street, and then transitions to a 12-inch line south of the intersection of New Hampshire Avenue and 7th Street; an 8-inch sewer line that drains north to south two feet east of the alley centerline; a 10-inch sewer line that drains east to west six feet north of the street centerline of 7th Street, downstream of the 8-inch sewer line in the alley, which connects into the 10-inch line in New Hampshire Avenue at the intersection of New Hampshire Avenue and 7th Street.[108] Based on the Project's Sewer Capacity Availability Report (SCAR), the City of Los Angeles' Bureau of Engineering provided a will serve letter noting that capacity is available for the Project within the Wilshire Boulevard and New Hampshire Avenue sewer lines.[109]

Construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary and within the scope of impacts evaluated in this MND. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to through traffic flow, which would consider any off-site utility improvements, as necessary. See Response No. 14.a above, for further discussion of the Project's Construction Traffic Management Plan.

As shown in **Table B-29**, *Estimated Wastewater Generation*, implementation of the Project would generate approximately 82,500 gallons per day (gpd), or 51,348 gpd of wastewater beyond existing conditions. The HTP is designed to treat 450 million gallons per day (mgd) with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.[110,111]

[108] Memorandum: 3240 Wilshire Boulevard, Los Angeles, CA – Wastewater, prepared by Mr. Michael Crehan, Psomas, dated May 5, 2016.
[109] Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on June 13, 2016.
[110] The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of

TABLE B-29
ESTIMATED WASTEWATER GENERATION

Land Use	Quantity	Factor	Average Daily Flow (gpd)
Existing Land Uses			
Office	26,008 s.f.	170 gpd/1,000 s.f.	4,422 gpd
Medical Office	10,314 s.f.	250 gpd/1,000 s.f.	2,579 gpd
Retail	45,662 s.f.	25 gpd/1,000 s.f.	1,142 gpd
Restaurant – Full Service	730 seats	30/seat	21,900 gpd
Restaurant – Take Out	1,823 s.f.	300 gpd/1,000 s.f.	547
Spa	22,475 s.f.	25 gpd/1,000 s.f.	562
		Total	31,152 gpd
Proposed Land Uses			
Hotel	190 rooms	120 gpd/room	22,800 gpd
Residential: Apt- Bachelor	196 units	75 gpd/d.u.	14,700 gpd
Residential: Apt-1 bedroom	247 units	110 gpd/d.u.	27,170 gpd
Residential: Apt-2 bedrooms	102 units	150 gpd/d.u.	15,300 gpd
Lobby of Retail Area	41,058 s.f.	50 gpd/1,000 s.f	2,053 gpd
Retail Area (less than 100,000 s.f.)	5,102 s.f.	25 gpd/1,000 s.f.	128 gpd
Industrial Discharge	350 s.f.	100 gpd/gpd	350 gpd
		Total	**82,500 gpd**
	Net Increase (Existing/Proposed)		**51,348 gpd**

s.f. = square feet; gpd = gallons per day; d.u. = dwelling unit.

SOURCE: Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on June 13, 2016; Memorandum: 3240 Wilshire Boulevard, Los Angeles, CA – Wastewater, prepared by Mr. Michael Crehan, Psomas, dated May 5, 2016.

Given the current capacity of the HTP, Project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase.

Based on the above, and given existing and anticipated future capacity at the wastewater treatment facilities and wastewater generation expected from the Project, impacts regarding wastewater facilities would be less than significant.

413 mgd, and peak wastewater flow of 850 mgd.. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

111 City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: http://www.lacitysan.org/wastewater/factsfigures.htm. Accessed September 2015.

Water

Less Than Significant Impact. A short-term demand for water would occur during demolition, excavation, grading, and construction activities on-site. These activities would occur incrementally over time from the start of construction to occupancy of the Project and would be temporary in nature. Thus, the demand for water supplies for use in soil watering (fugitive dust control), concrete preparation, clean up, masonry, painting, and other activities would be temporary and intermittent. The demand for water during grading and excavation activities is assumed to be similar to irrigation demand, or approximately 3,000 gallons per acre per day.[112] The water demand generated by Project construction activities would be offset by the reduction in water consumption from demolition of the existing uses. Specifically, existing uses currently consume approximately 38,608 gpd,[113] while construction-related water use on a 2.14-acre site would be approximately 6,420 gpd based on the factor of 3,000 gallons per acre per day. Overall, demolition and construction activities would require minimal water demand and would not be expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

Existing water lines within the City of Los Angeles adjacent the Project Site, which would serve the Project, include a 30-inch DWP water main 22 feet south of the street centerline of Wilshire Boulevard; a 6-inch water line 15 feet east of the street centerline of New Hampshire Avenue, and a 4-inch water line 13 feet of the street centerline of New Hampshire Avenue.[114] Nearby fire hydrant locations include between 7th Street and Wilshire Boulevard on the west side of New Hampshire Avenue; on the southwest corner of New Hampshire Avenue and 7th Street; on the southwest corner of 7th Street and Vermont Avenue; and on the northeast corner of Wilshire Boulevard and Vermont Avenue.[115] All connections and water-related infrastructure improvements would be provided by the Project in consultation with the DWP and LAFD, as necessary. Further, all water line improvements and connections would be provided in consultation with the LAFD to ensure that the minimum fire flow requirements would be provided the serve the Project.

A WSA for the Project was prepared by DWP in conformance with California law and City ordinances to ensure the Project is consistent with the City's conservation goals and long-term water supply availability, as detailed in the Water System's 2015 Urban Water Management Plan (UWMP). The UWMP is the water supply planning document for the City and is prepared by DWP. Each WSA performed by DWP is carefully evaluated within the context of UWMP and

[112] Estimated landscape irrigation is based on a factor of 20.94 gallons per year per square foot of landscaped area within the Los Angeles area (Mediterranean climate), which assumes high water demand landscaping materials and an irrigation system efficiency of 85% (high efficiency). Factor is therefore (20.94 gal/s.f./year) x (43,560 s.f./acre)/ (365 days/year)/ (0.85) = 2,940 gallons/acre/day, rounded up to 3,000 gallons/acre/day. Source: U.S. Department of Energy, Energy Efficiency & Renewable Energy, Federal Energy Management Program. "Guidelines for Estimating Unmetered Landscaping Water Use." July 2010. Page 12, Table 4 - Annual Irrigation Factor – Landscaped Areas with High Water Requirements.

[113] WSA for the 698 New Hampshire Project prepared by the Los Angeles Department of Water and Power, dated September 7, 2016.

[114] Memorandum: 3240 Wilshire Boulevard, Los Angeles, CA – Domestic Water, prepared by Mr. Michael Crehan, Psomas, dated May 5, 2016.

[115] Ibid.

current conditions, such as restrictions on State Water Project (SWP) pumping from the Sacramento-San Joaquin River Delta (Delta) imposed by a Federal Court. The Metropolitan Water District of Southern California (MWD), from whom the City purchases its SWP and Colorado River water supplies, has also been actively developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. DWP coordinates closely with MWD to ensure implementation of MWD's water resource development plans.

Part of MWD's planning effort is the update and implementation of its Integrated Water Resources Plan (IRP) and Urban Water Management Plan, which are designed to address potential reductions in water supply due to the effects of variable hydrologic conditions and regulatory restrictions on exports from the Delta. The 2015 IRP update resulted in the development of the following six main findings and conclusions: action is needed to minimize unacceptable level of shortage allocation frequency in the future, maintain Colorado River supplies, stabilize SWP supplies, develop/protect local supplies and water conservation, maximize effectiveness of storage and transfers, and continue with adaptive management approach.

DWP's 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrological periods. This water shortage contingency plan was implemented on June 1, 2009, when the Board adopted Shortage Year Rates and the City Council implemented the landscape irrigation and prohibited use restrictions contained in the City's Water Conservation Ordinance. The City's Water Rate Ordinance, adopted June 1995 was last amended by the Board, effective April 15, 2016. The new water rate structure increases the number of tiers from two to four for single-family residential customers. The goal is to incentivize conservation while recovering the higher costs of providing water to high volume users. In keeping with cost of service principles, the incremental pricing for the tiers is based on the cost of water supply and, for the third and fourth tiers, added pumping and storage costs.

Various conservation measures are also required through the following regulations: the City's Green Building Codes Revision/Use of Greywater Systems I Water Conservation Measures Ordinance No. 184248, the City's Water Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code. All codes became effective January 1, 2014, except Ordinance No. 184248, effective June 2016 and Ordinance No. 180822, effective December 2009.

As part of the WSA process, DWP staff recommended implementation of additional voluntary water conservation measures to maximize the potential water-use efficiency for the Project. Recommended voluntary conservation measures are in addition to those required by the City's current codes and ordinances. Based on DWP staff recommendations, the Applicant has voluntarily committed to implement the following additional measures that are beyond those required by law (see PDF UTIL-1):

- Waterless Urinals

- Residential Lavatory Faucets with flow rate of 1.0 gallons per minute or less
- Showerheads with flow rate of 1.5 gallons per minute or less
- High Efficiency Toilets with flush volume of 0.8 gallon of water per flush
- Cooling Tower Conductivity Controllers for Cooling Tower pH Conductivity Controllers
- Water-Saving Pool Filter
- Pool/Spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Leak Detection System for swimming pools and Jacuzzi
- Installation of a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Zoned Irrigation
- Landscaping Contouring to minimize precipitation runoff
- Artificial Turf
- Rainwater Harvesting

With the addition of these voluntary water conservation measures, which yield additional savings of approximately 6 acre feet per year (AFY), the total net additional water demand (Project minus existing conditions) is approximately 79 AFY.[116],[117]

The Applicant has also committed to comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance Nos. 181899 and 183833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the Project as applicable:

- All excess runoff will be directed to a filtration planter before being discharged to the street.
- Greywater Systems.
- Pervious Pavements - captures runoff by allowing stormwater to pass through the pavement surface and then infiltrate into the groundwater basin.

[116] 1 acre-foot equals 325,900 gallons.
[117] Existing conditions water demand is approximately 43 AFY. Project water demand (without conservation measures) is approximately 128 AFY. Please refer to WSA for detailed calculations of existing and Project water demand.

Per the WSA, the Project is determined by City Planning Department to be consistent with the demographic projections for the City from both the 2012 and 2016 Regional Transportation Plans (RTP) by SCAG. The City's water demand projection in 2015 UWMP was developed based on the 2012 RTP demographic projection using the 2010 U.S. Census for the City.

DWP used a modified-unit-use approach to develop its service area-wide water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. The 2015 UWMP concluded there are adequate water supplies to meet projected water demand through 2040. Therefore, projected water supply available during normal, single-dry, and multiple-dry water years as included in the 25-year projection of 2015 UWMP is sufficient to meet the projected water demand associated with the Project, in addition to the existing and planned future demand on DWP.

Based on the above, no additional water treatment facilities are required to meet the water supply demands associated with the Project, and the Project would not require the construction or expansion of water treatment facilities. Therefore, water infrastructure impacts associated with the Project operation would be less than significant.

Project Design Features

PDF UTIL-1 The Applicant has voluntarily committed to implement the following water conservation measures that are beyond those required by law:

- Waterless Urinals
- Residential Lavatory Faucets with flow rate of 1.0 gallons per minute or less
- Showerheads with flow rate of 1.5 gallons per minute or less
- High Efficiency Toilets with flush volume of 0.8 gallon of water per flush
- Cooling Tower Conductivity Controllers for Cooling Tower pH Conductivity Controllers
- Water-Saving Pool Filter
- Pool/Spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Leak Detection System for swimming pools and Jacuzzi
- Installation of a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Zoned Irrigation
- Landscaping Contouring to minimize precipitation runoff
- Artificial Turf

- Rainwater Harvesting

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?

Less Than Significant Impact. As discussed in detail in Section 9, *Hydrology and Water Quality*, stormwater would be collected through roof and on-site drains then directed to infiltration wells or filtration (SUSMP) planters. The overflow would be directed to the existing gutter system through parkway drains. The use of infiltration wells and/or SUSMP planters would meet City of Los Angeles Low Impact Development (LID) standards. Environmental impacts associated with the development of the Project, including on-site drainage facilities, have been evaluated throughout this MND document. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities, would be less than significant after implementation of the prescribed mitigation measures, where necessary. Therefore, impacts would be less than significant in this regard.

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

Less Than Significant Impact. As described in Response 17.b above, per the WSA prepared by DWP, the Project would fall within the 2015 DWP UWMP available and projected water supplies. According to the WSA, the water supplies available in the single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the service area through the Year 2040, including the Project. As a result, the Project is within the capacity of the DWP to serve the Project as well as existing and planned future water demands of its service area. Thus, no new or expanded entitlements are needed. A less than significant impact would occur in this regard.

e. Result in a determination by the wastewater treatment provider which services or may serve the project that it has adequate capacity or service the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in Response No. 17.b above, implementation of the Project would generate approximately 82,500 gpd, or 51,348 gpd of wastewater beyond existing conditions. The HTP is designed to treat 450 mgd with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available. Given the current capacity of the HTP, Project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase. Therefore, the Project would have a less than significant impact with respect to wastewater treatment capacity.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available.[118] In addition to in-County landfills, out-of County disposal facilities may also be available to the City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2027 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

As illustrated in **Table B-30,** *Projected Solid Waste Generated During Operation*, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the Project could generate approximately 2,586 lbs/day (1.293 tons/day or 471.95 tons/year) of solid waste, or approximately 1,907 lbs/day (0.953 tons/day or 347.84 tons/year) of solid waste beyond existing conditions. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 129.2 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County's available regional landfills.

The California Department of Resources and Recycling and Recovery (CalRecycle) is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the Project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets. Further, it is likely that many residents in the Project's condominiums are already living in and therefore generating waste in Los Angeles County, such that this total does not represent "new" waste.

[118] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report. August 2013.

TABLE B-30
PROJECTED SOLID WASTE GENERATED DURING OPERATION

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Office	26,008 s.f.	6 lbs/k.s.f./day	156	0.078	28.47
Medical Office	10,314 s.f.	6 lbs/k.s.f./day	62	0.031	11.32
Retail	45,662 s.f.	5 lbs/k.s.f./day	228	0.114	41.61
Restaurant	24,298 s.f.	5 lbs/k.s.f./day	121	0.061	22.27
Spa	22,475 s.f.	5 lbs/k.s.f./day	112	0.056	20.44
		Total	**679**	**0.34**	**124.11**
Proposed Land Uses					
Residential	545 units	4 lbs/unit/day	2,180	1.090	397.85
Hotel	190 rooms	2 lbs/room/day	380	0.190	69.35
Retail	5,102 s.f.	5 lbs/k.s.f./day	26	0.013	4.75
		Total	**2,586**	**1.293**	**471.95**
	Net Increase (Existing/Proposed)		**1,907**	**0.953**	**347.84**

Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f.= thousand square feet; lbs. = pounds.

[a] Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm, accessed June 2016.

SOURCE: ESA PCR Services Corporation, 2016.

Construction of the Project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of construction associated debris at the landfills. It is anticipated that a large amount of the construction debris would be recycled. Disposal and recycling of the construct debris would be required to comply with all Federal, State, and local regulations. In addition, the Project would comply with Chapter 6, Public Works and Property, Article 6, Garbage, Refuse Collection, of the LAMC. According to the LAMC, the Project Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the Project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Based on the above, a less than significant impact regarding solid waste would occur.

g. Comply with Federal, State, and local statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City of Los Angeles, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The Project does not include any component that would conflict with State laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, less than significant impacts regarding compliance with AB 939 would occur with Project implementation.

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?

Less Than Significant Impact. The preceding analysis does not reveal any significant unmitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently developed with the Galleria Building and a surface parking lot.

The Project would not significantly impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 1, and would not result in excessive light or glare. The Project Site is located within an urbanized area and does not support sensitive plant or animal species or habitat. Potentially significant impacts to nesting birds and street trees would be reduced to a less than significant level with implementation of the prescribed mitigation measures. Adverse impacts to archaeological and paleontological resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with the prescribed mitigation measures. Also, as discussed under Response 5.a, impacts regarding historical resources (i.e., the Galleria Building) would be less than significant with implementation of the prescribed mitigation measures.

This Project Site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section 3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant. Sections 7 and 9 conclude that impacts related to climate change and hydrology and

water quality will be less than significant after implementation of the prescribed mitigation measures, where applicable.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulative 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).

Less Than Significant Impact. A description of 67 related projects in the Project study area is provided in **Table B-31**, *Summary of Related Projects*, below. Related Projects are mapped in **Figure B-7**, *Related Projects Map*, below. The related projects are utilized to analyze cumulative impacts associated with Project implementation. Below is a discussion of cumulative impacts associated with the Project.

Cumulative Impacts

Aesthetics

Development of the Project in conjunction with the related projects would result in an incremental intensification of land uses in the heavily urbanized area of the City of Los Angeles, many of which are designated as Wilshire Regional Center or other designated centers in the General Plan Framework planned for high-intensity uses.[119] The Project area is also located within the Wilshire Center/Koreatown Redevelopment Project. New development and concentration of development, particularly in Transit Priority Areas, as is the Project Site and the majority of related projects, is consistent with the objectives of the Regional Center designation and the Redevelopment Plan to enliven the street front, upgrade the quality of development, and to generate more pedestrian activity in Regional Centers. Because of the area's flat terrain, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Partial views of the Hollywood Hills are available through north facing street corridors, such as Vermont Avenue. However, scenic vistas in the area consist primarily of historical buildings and buildings with notable architecture. These consist primarily of high-quality historical buildings, such as the Immanuel Presbyterian Church and the art deco Bullock's Wilshire, that were constructed in the 1920s and 1930s, and of newer buildings, such as the 19-story 600 Commonwealth Building and the 34-story Equitable Plaza building. Both of the latter buildings provide open plazas, seating, and other pedestrian amenities.

119 City of Los Angeles, Department of City Planning, General Plan Framework Element, Figure 3-1, Long Range Land Use Diagram – Metro, February 19, 2003.

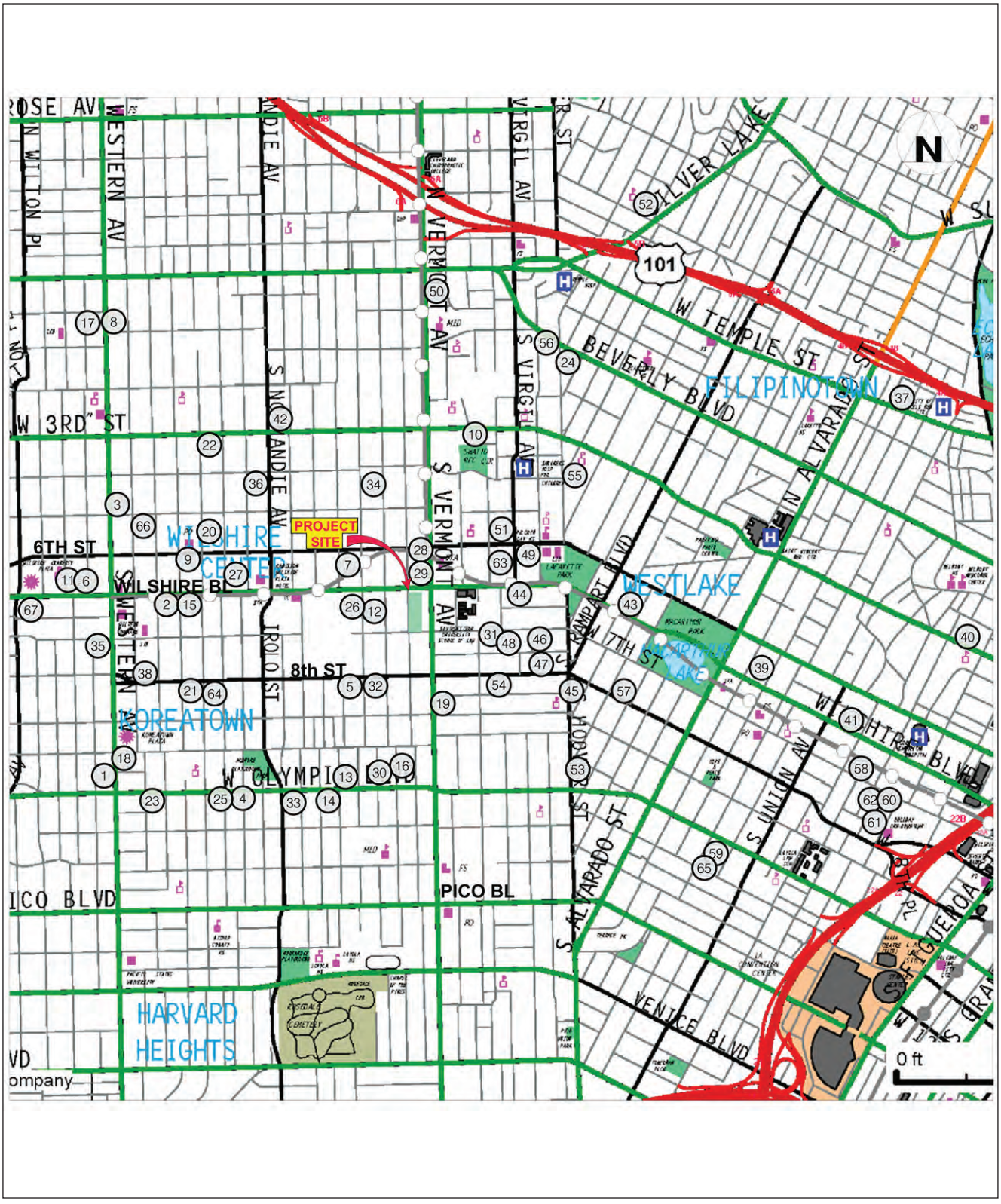
TABLE B-31
SUMMARY OF RELATED PROJECTS

	Project	Size	Location
1	Office	27,720 sf	3323 W. Olympic Boulevard
	Apartments	40 units	
2	Apartments	378 units	367 Wilshire Boulevard
	Retail	8,000 sf	
3	Retail	130,500 sf	450 S Western Avenue
4	Retail	109,000 sf	3060 W. Olympic Boulevard
5	Condominiums	224 units	805 S. Catalina Street
	Retail	7,000 sf	
6	Apartments	136 units	688 S Berendo St
7	Apartments	7 units	621 S. Catalina Street
	Hotel	75 rooms	
	Restaurant	1,547 sf	
8	Apartments	98 units	100 N. Western Avenue
	Retail	30,000 sf	
9	Office	55,380 sf	3663 W. Wilshire Boulevard
	Nursery School	216 students	Wilshire Temple Master Plan
	Elementary	420 students	
10	Charter School	696 students	3400 W. 3rd Street
11	Apartments	220 units	2875 W. Wilshire Boulevard
12	Apartments	174 units	680 S. Berendo Street
13	Hotel	78 rooms	2870 W Olympic
	Retail/Restaurant	16,384 sf	
14	Hotel	86 rooms	1020 S. Fedora Street
15	Apartments	209 units	3640 W. Wilshire Boulevard
16	Church	85,3058 sf	968 S. Berendo Street
17	Restaurant	11,904 sf	135 N. Western Avenue
18	Apartments	81 units	940 S. Western Avenue
	Retail	8,000 sf	
19	Apartments	411 units	864 S. Vermont Avenue
20	Apartments	85 units	535 S. Kingsley Drive
21	Apartments	131 units	800 S. Harvard Boulevard
	Retail	7,000 sf	
22	Hotel	173 rooms	4110 W. 3rd Street
	Retail	2,780 sf	
23	Apartments	91 units	1011 S. Serrano Avenue
24	Apartments	32 units	3200 W Beverly Boulevard
	Retail	5,870 sf	
25	Apartments	226 units	3076 W. Olympic Boulevard
	Retail	16,000 sf	
26	Apartments	120 units	3350 W. Wilshire Boulevard
27	Apartments	425 units	3545 W. Wilshire Boulevard
	Retail	36,676 sf	
28	Apartments	101 units	605 S. Vermont Avenue
	Museum	30,937 sf	

Project	Size	Location
29 Apartments	179 units	627 S. Vermont Avenue
Retail	12,000 sf	
30 Retail	20,607 sf	2789 W. Olympic Boulevard
Office	2,780 sf	
31 Apartments	180 units	2972 W. 7th Street
Retail	15,000 sf	
32 Apartments	100 units	3100 W. 8th Street
Retail	9,496 sf	
33 Apartments	79 units	1017 S. Mariposa Avenue
34 Apartments	85 units	427 S. Berendo Street
35 Apartments	161 units	700 S. Manhattan Place
Retail	10,000 sf	
36 Apartments	224 units	411 S. Normandie Avenue
37 Condominiums	206 units	1924 W Temple Street
Apartments	46 units	
Retail	19,103 sf	
38 Apartments	367 units	3525 W. 8th Street
Retail	16,500 sf	
Market	23,000 sf	
39 Apartments	52 units	619 S Westlake Avenue
Public Parking		
40 Apartments	122 units	1435 W 3rd Street
41 Apartments	217 units	1501 W Wilshire Boulevard
Retail	2,400 sf	
Restaurant	4,450 sf	
42 Apartment	140 units	NWC Third & Mariposa
Retail	3,940 sf	
43 Condominiums	160 units	2525 Wilshire Boulevard
Retail	7,500 sf	
44 Apartments	32 units	3033 Wilshire Boulevard
Retail	5,867 sf	
45 Condominiums	32 units	820 S Hoover Street
Retail	4,500 sf	
46 Condominiums	160 units	2850 W 7th Street
Hotel	40 rooms	
Retail	3,600 sf	
47 Retail	50,000 sf	2723 W 8th Street
48 Condominiums	80 units	2929 W Leeward Av
49 Apartments	399 units	2968 W 6th Street
Retail	20,000 sf	
50 Apartments	100 units	241 N Vermont
Retail	5,000 sf	
51 Hotel	99 rooms	2965 W 6th Street
Restaurant	545 sf	
52 Apartments	137 units	609 N Dillon
Retail	18,000 sf	

Project	Size	Location
53 Apartments	108 units	1011 S Park View St
54 Apartments	81 units	2859 W Francis Av
55 Apartments	65 units	326 S Reno
56 Apartments	40 units	3330 W Beverly Blvd
Child Care	4,237 sf	
57 Apartments	144 units	2405 W 8th St
Retail	4,406 sf	
58 Apartments	94 units	1329 W 7th Street
Retail	2,000 sf	
59 Hotel	160 rooms	1700 W Olympic Boulevard
60 Apartments	90 units	1218 W Ingraham Street
61 Condominiums	58 units	742 S Hartford Avenue
62 Restaurant	9,600 sf	1728 W 7th Street
Bar	3,500 sf	
63 Apartments	77 units	616 Westmoreland
Retail	745 sf	
Restaurant	1,360 sf	
64 Apartments	90 units	815 S Kingsley Drive
65 Charter School	460 students	1633 W 11th Street
66 Apartments	119 units	4074 W 5th Street
Retail	13,000 sf	
67 Apartments	228 units	3986 W Wilshire Boulevard
Coffee Shop	5,000 sf	
Restaurant	5,000 sf	
Retail	12,000 sf	

SOURCE: *Overland Traffic Consultants, Traffic Impact Study, June 2016.*



SOURCE: Overland Traffic Consultants, Inc., 2016

698 New Hampshire

Figure B-7
Related Projects Map

ESA PCR

Related projects in combination with the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Although some views of architecturally or historically important buildings could be obscured by taller buildings occurring within a line of sight over existing low rise development and parking lots, this would be highly specific, and taller new development is not anticipated to cumulatively block scenic vistas.

Because the visual character of the area is defined by a range of diverse architecturally interesting buildings, it is anticipated that new development would introduce more architecturally interesting buildings and, consistent with the City's Walkability Checklist and Citywide Design Guidelines, would continue to enhance the character of the street front with updated landscaping and design components. In addition, new development, as with the Project, would contribute to the skyline by introducing a variety of building heights and styles and, as such, contribute to the urban character of the area. Because new development that is subject to discretionary action must implement the City's Citywide Design Standards, it is anticipated that the related projects would be of high quality design and construction. As such, with the implementation of existing guidelines, related projects in combination with the Project are not considered to result in the substantial, cumulative degradation of the area's visual character.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not cause a significant cumulative adverse effect on existing uses.

Building plans for new related projects would be reviewed on a case-by-case basis by the City Department of Building and Safety to ensure that new construction would avoid the use of glare-prone materials. For new development projects, the use of high-performance materials such as tinted non-reflective glass or other non-reflective surface materials, cladding, and trim is required. With the implementation of standard city mitigation similar to the Project, cumulative glare impacts would be less than significant.

Overall, cumulative aesthetics impacts would be less than significant consistent with SB 743/PRC 21099 and City of Los Angeles ZI No. 2451.

Agricultural and Forest Resources

As with the Project, related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and do not support existing farming, agricultural or forest-related operations. Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no cumulative impacts on agricultural or forest resources would occur.

Air Quality

Response No. 2.b, above, discusses the Project's potential to result in a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard. As discussed therein, cumulative impacts were determined to be less than significant.

Biological Resources

With regard to cumulative biological resources impacts, the Project Site is located in an urbanized area and like the Project, other developments occurring in the Project area would occur on previously disturbed, urbanized land. The Project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect in these regards. The Project would fully comply with City ordinances pertaining to tree removal, resulting in no net loss of trees from Project implementation. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measure. Related projects would also be required to comply with the City's street tree replacement requirements and implement mitigation for impacts to nesting birds. Therefore, cumulative impacts to biological resources would be less than significant.

Cultural Resources

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis. As discussed previously, mitigation measures would ensure the Project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, that Project does not directly or indirectly destroy a unique paleontological resource and that the Project does not adversely affect human remains. It is anticipated that comparable implementation of similar mitigation measures and/or compliance with existing regulations would be incorporated into the approval of each related project. Additionally, as discussed above, the Project would not result in a significant impact to the historic Galleria Building with implementation of the prescribed mitigation measures. Further, as discussed under Response No. 5.a, indirect impacts to cultural resources located in the Project vicinity would be less than significant. Overall, cumulative impacts to cultural resources would be less than significant.

Geology and Soils

Geological and geotechnical impacts are defined by site-specific conditions for the Project and related projects and are, therefore, typically confined to contiguous properties or to a localized area in which concurrent construction projects in close proximity could be subject to the same fault rupture system or other geologic hazard, or exacerbate erosion impacts. The Project Site is not underlain by an active earthquake fault and, thus, would not contribute to cumulative seismic rupture impacts. Although seismic shaking would occur on the Project Site as well as related project sites, the Los Angeles Building Code would require consideration of seismic loads in structural design for all related projects. As such, cumulative impacts associated with ground shaking would be less than significant. The Project Site is not located within a State-designated

hazard zone for earthquake induced liquefaction or landslides and, as such, would not cumulatively contribute to liquefaction or landslide impacts. While the loss of topsoil among the Project and related projects during construction could result in cumulative erosion impacts, the Project and related projects would be required to implement LAMC regulations for grading and excavations during construction, including SWPPP requirements. Because the Project Site contains favorable conditions for foundations and, as with related projects, would be required to comply with approved geotechnical recommendations, the Project's contribution to potential cumulative impacts from lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. In addition, the Project and related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the Project and related projects would not need to use septic tanks or alternative waste disposal systems and, as such, cumulative impacts relative to waste disposal capacity would be nil. Because the Project would not contribute considerably to geology and soils impacts, the Project's cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG emissions impacts are cumulative. As such, the impact discussions included above in Responses 7.a-b, address the Project's potential to result in a cumulatively considerable GHG impact. As discussed therein, impacts would be less than significant.

Cumulative Hazards and Hazardous Materials

Implementation of the Project would involve the rehabilitation and adaptive reuse the Galleria Building, excavation for and construction of new mid- and high-rise buildings, and new development within a Methane Zone. Existing materials within the Galleria Building have the potential to contribute to cumulative impacts from hazards and hazardous materials through the additional transport, storage, use, or handling of hazardous materials. Because much of the surrounding area is located within a Methane Zone, and other methane zones such as the Wilshire (Fairfax District) Methane Hazard Zone and the Central Wilshire Methane Zone are located nearby, many of the related projects would be constructed within Methane Zones. Related projects in the area located within Methane Zones would be subject to the requirements of Section 91.7102 of the Municipal Code, similar to the Project. With compliance to applicable regulatory requirements, cumulative impacts with respect to releases or accidents related to methane gas would be less than significant.

Many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. As with the Project, related projects would be required to use and store all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with Federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials. Some of the related project may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including

cleanup sites, and hazardous materials generators. Cumulative impacts would therefore be less than significant in this regard.

Some of the related projects may also include the use of hazardous materials and, as with the Project, be located within one-quarter mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within one-quarter mile of a school. The Project would not have a considerable contribution related to the use or release of hazardous materials. With the implementation of existing regulations, cumulative impacts with respect to impacts on schools would be less than significant.

Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. However, as with the Project, the related projects are located within the highly urbanized Wilshire Community or Central City, which are largely characterized by existing buildings and paved surfaces with limited landscaped areas. Accordingly, the potential to generate a notable amount of new impermeable surfaces is limited. Pursuant to the City's LID Ordinance, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's SUSMP BMPs, through one or more of the City's preferred SUSMP improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, compliance with applicable regulatory requirements would avoid significant impacts on drainage/flooding conditions and the quality of water reaching the public drainage system. Cumulative impacts to hydrology and water quality would be less than significant.

Land Use and Planning

As with the Project, related projects would be located primarily within the Wilshire Regional Center or the Downtown Center and would have general access or proximity to transit. Several of the closer related projects would be within walking distance of the Wilshire/Vermont Metro Red Line Station and other related projects are in proximity to other stations along Metro's Red Line. The intensification of development within this area would be consistent with the intent of the General Plan Framework, the Wilshire Community Plan, and the Wilshire/Koreatown Redevelopment Project to upgrade the quality of development in the area and to provide a variety of commercial and residential uses, including affordable housing and access to transit. As with the Project, many related projects contain high-rise components, which would further define the

physical character of the Regional Center. In addition, many related projects feature mixed-use components that provide housing and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance with the objectives of the General Plan Framework and other adopted plans. Related projects, which would accommodate a broad range of uses that provide job opportunities and enhance urban lifestyles, would be consistent with the General Plan's objectives related to Regional Centers and with the underlying commercial and high-density residential zoning in the area. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, cumulative land use impacts would be less than significant.

Mineral Resources

As discussed above, the Project would have no impact on mineral resources. Because of the large number and broad extent of City oil drilling districts and State-designated oil fields in the Project study area, including the LA City Oil Field immediately to the north, the Las Cienegas Oil Field to the south, the Downtown Oil Field to the east, and the Salt Lake Oil Field to the west, some of the related projects would be located within these designated areas. However, with implementation new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. Regardless, because the Project would have no incremental contribution to the potential cumulative impact on mineral resources, the Project would have no cumulative impact on such resources.

Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate Project area likely would contribute to cumulative noise impacts.

Construction Noise

Noise from construction of the Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There are three related projects in the surrounding area within approximately 500 feet of the Project Site (Related Projects Nos. 12, 28, and 29). All other related projects are greater than 500 feet from the Project Site and would not contribute substantially to cumulative construction noise impacts. Because the timing of the construction activities for all cumulative projects cannot be defined and are beyond the control of the City and the Applicant, quantitative analysis that assumes multiple, concurrent construction projects would be speculative. The cumulative noise levels would be intermittent, temporary and would cease at the end of the respective construction periods. It is not likely that maximum construction noise impacts from the cumulative projects would occur simultaneously, as sound levels vary from day to day depending on the construction activity performed that day and its location on the development site. Due to distance attenuation and intervening structures, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other site, which would preclude a cumulative noise

impact. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the Project. As such, cumulative impacts associated with construction noise would be less than significant.

Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and other projects in the Project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future cumulative base traffic volumes in the Project vicinity. The noise levels associated with cumulative base traffic volumes with the Project are identified above in Table B-14. Noise level increases in the Project vicinity would reach a maximum of 0.9 dBA CNEL along Wilshire Blvd east of Vermont Avenue and along New Hampshire Avenue north of Wilshire Blvd, which would not exceed the Project's 3 dBA significance threshold. Therefore, with respect to roadway noise, there is no potential for the Project to result in a cumulatively considerable contribution when considered together with related project traffic volumes.

Due to Section 112.02 of the LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to Project-related noise levels. As the Project's composite stationary-source impacts would be less than significant, composite stationary-source noise impacts attributable to cumulative development would also be less than significant.

Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the Project Site, there is no potential for the Project to result in a cumulatively considerable contribution, when considered together with the related projects, to cumulatively significant construction-related or operational impacts.

Population and Housing

The Project is consistent with the growth policies of the 2016 RTP/SCS in that it would concentrate mixed uses within a TOD and HQTA. Related projects are located primarily in the Wilshire and Central Los Angeles Community Plan Areas. Total anticipated direct growth associated with related projects would be approximately 7,641 residential units and more than 16,000 population assuming approximately 2.4 persons per unit in the Wilshire Community Plan and 1.63 persons per unit (based on current occupancy rates in those areas) in Central City. The majority of related projects would be located within one-half mile of the Wilshire Boulevard corridor, which is served by the Purple Line subway between Downtown Los Angeles and Western Avenue. On the surface, Wilshire Boulevard is served by Metro Local Route 20 and Metro Rapid Route 720. Other related projects are located near the Vermont Avenue corridor, which is served by the Red Line subway. Related projects located between Hoover Street and the Harbor Freeway are also served by the Purple/Red Line. Because the majority of new related

projects would be clustered within TOD areas with proximity to transit, as is the Project, these related projects would be considered to implement the City's and SCAG's population growth policies.

Related projects in combination with the Project would not result in the cumulative loss or reduction of housing. Therefore, cumulative impacts with respect to population and housing are considered to be less than significant.

Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD.

Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Wilshire Community Plan Area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. According, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project is required to mitigate.

Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined

warranted by LAPD, and was foreseeable, the Wilshire Community Plan Area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. According, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate.

Based on the above considerations, the Project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

Pursuant to California Government Code Section 65995, the payment of developer fees under the provisions of SB 50 address the impacts of new development on school facilities serving that development. Compliance with the provisions of Section 65995 is deemed to provide full and complete mitigation of school facilities impacts. The Project as well as the related projects would be required to pay these fees as applicable. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools to less than significant levels.

Parks

The 67 related projects would result in the potential development of approximately 7,641 residential units and more than 16,000 new residents. To meet PRP goals of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two acres each of neighborhood and community parkland per 1,000 persons in the long-term, more than 32 acres of new neighborhood and community parkland in the short-term and 32 additional acres of new parkland may be required in the long term.

As with the Project, new related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition, LAMC Sections 17.12 and 12.33, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. In addition to the provision of on-site recreational amenities for related residential related projects, the implementation of required parks and recreational fees under the LAMC would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities. Cumulative impacts to parks would be less than significant.

Other governmental services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional library services from the LAPL. The related projects would generate revenue to the

City's general funds that could be used to fund LAPL expenditures as necessary to offset the cumulative incremental impact on library services. Similar to the Project, the related projects would pay applicable development fees based upon the projected population of the individual developments. The full payment of all applicable library fees would reduce potential cumulative impacts to libraries to less than significant levels.

The related project's residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized Project vicinity. Similar to the Project, the related projects would need to pay applicable development impact fees of the City of Los Angeles. The full payment of all applicable fees would reduce potential cumulative impacts to other governmental services/facilities to less than significant levels.

Recreation

Refer to discussion under Parks, above.

Transportation and Circulation

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant. The Project would result in a less than significant traffic impact during construction with the implementation of a Construction Traffic Management Plan that would incorporate notification and safety procedures and controls. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a Construction Traffic Management Plan, to reduce potential traffic impacts during construction.

The future (2020) service level conditions presented in Table B-26, Future (2020) Traffic Conditions with Project, represent a combination of estimated trips from all related projects, as well as incremental annual growth, and are cumulative in nature. As shown in Table B-26, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs, including development of Metro's LRTP. As indicated in the discussion of Project impacts above, the Project would not have a significant impact on public transit and would be consistent with the City's Mobility Element 2035. The cumulative increase in transit demand under related projects is addressed and supported by the CMP and the Mobility Element 2035. As such, cumulative projects would be consistent with adopted policies, plans or programs regarding public transit. In addition, the Project would provide bicycle and vehicle parking in compliance with City Code requirements. Each related project would be reviewed by the City to ensure compliance with the City's

requirements relative to the provision of adequate bicycle and vehicle parking. Therefore, impacts related to consistency with adopted policies, plans or programs regarding bicycle facilities would be less than significant.

Utilities and Service Systems

Water Supply

DWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by DWP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for new sizable development projects as defined by Section 10912 of the CWC within its service area. The types of projects subject to the requirements of SB 610 tend to be larger projects (i.e., residential projects with at least 500 dwelling units, shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc.) that may or may not have been included within the growth projections of the UWMP. The WSA for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, as described above, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the service provider (i.e., DWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project.

DWP's 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrological periods. In addition, water conservation measures are required for new development projects occurring in the City. The 2015 UWMP concluded there are adequate water supplies to meet projected water demand through 2040. Therefore, projected water supply available during normal, single-dry, and multiple-dry water years as included in the 25-year projection of 2015 UWMP is sufficient to meet the projected water demand associated with the Project, in addition to the existing and planned future demand on DWP, which is assumed to include the related projects. Further, per MWD’s 2015 UWMP, MWD has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry-year and multiple dry-year hydrologic conditions, as well as average year hydrologic conditions, which accounts for regional growth. Also, MWD has comprehensive plans for stages of actions it would undertake to address up to a 50 percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans. As such, significant cumulative impacts related to water demand would not occur.

Development of the Project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to City review to assure that the existing public utility facilities would be adequate to

meet the domestic and fire water demands of each project. Furthermore, LADWP as well as the City of Los Angeles Department of Public Works conducts ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

Wastewater

Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP currently treats an average of 362 mgd, with a capacity to treat 450 mgd. The City has adopted an Integrated Resources Plan (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any direct cumulative relationship between the development of the Project and the related projects. Therefore, no significant cumulative sewer infrastructure impacts are anticipated from the development of the Project and the related projects. Therefore, cumulative impacts on sewer service would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available.[120] Thus, sufficient capacity would be available to meet the demand created by related projects. As discussed above, the Project impacts on solid waste disposal would be less than significant. In addition, similar to the Project, related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to checklist items in the City's Green Building Code, as applicable. As such, impacts to the solid waste system from cumulative development would be less than significant and thus, the Project would not contribute to a cumulatively significant solid waste impact.

Cumulative Impact Conclusion

Based on the analysis above, the City finds that with mitigation measures incorporated into the Project, the contribution of the Project to cumulative impacts would be less than significant.

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

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding

[120] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report. August 2013.

sections. The analysis contained in this Initial Study concludes that the Project will not result in significant adverse effects after implementation of mitigation measures.

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 identified in Sections 1-17 above.