



CITY OF LOS ANGELES

DEPARTMENT OF CITY PLANNING

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Environmental Case No.: ENV-2016-3144-MND

Related Case Nos.: CPC-2016-3142-GPA-ZC-VCU-CUB-DB-SPR

CPC-2016-3143-DA

VTT-74297

Project Title: The Lake on Wilshire

Council District No. 1

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

DOCUMENT FILED
City Clerk's Office
NG-16-390-FL
No: _____
Certified by: CEV
Date: 12-23-16

Project Addresses: 1930 West Wilshire Boulevard, Los Angeles, CA 90057

Project Description: The Project is located south of Wilshire Boulevard between South Westlake Avenue and South Bonnie Brae Street at 1930 West Wilshire Boulevard, Los Angeles, 90057. The Project Site is approximately 70,912 square feet (1.64 acres) and located in the Westlake Community Plan and in the Westlake Recovery and Redevelopment Project area. The Project Site is subject to Zoning Information (ZI) ZI-2374 Los Angeles State Enterprise Zone, ZI-2275 Westlake Recovery Redevelopment Project, and ZI-2452 Transit Priority Area in the City of Los Angeles.

The Project Site contains an existing approximately 14-story 115,560 square-foot medical office building and surface parking, with 168 parking spaces. Currently, approximately 104,000 square feet of the building is occupied (30,000 square feet office and 74,000 square feet medical office). The existing building was originally known as the Wilshire Medical Building and later also known as the Crocker Bank Building and is a designated historic resource (the individual property is eligible for the National Register by a consensus through Section 106 process and is listed in the California Register with Status Code 2S2).

The existing building on the Project Site will be converted to a hotel with up to 220 rooms. New construction will include a 41 story (459 feet), 514,887 square-foot residential building with up to 478 units (up to 120 studio units, 240 1-bedroom units, and 118 2-bedroom units) and a new learning, cultural and performing arts center of approximately 69,979 square feet that will include an 850-seat theater and a classroom/dance studio space capable of accommodating up to 50 students.

The Project will require approval of the following discretionary actions:

1. **General Plan Amendment (GPA).** General Plan Amendment to change the split Regional Center Commercial and Community Commercial land use designations and to apply the Regional Center Commercial land use designation to the entire site, and to exempt a portion of the Project Site (approximately 16,556 square feet of the 70,912 square-foot Project Site) from Community Plan Footnote No. 2, which limits certain areas to Height District No. 2.
2. **Density Bonus (DB).** A 35% density bonus to increase the unit density from 354 units to 478 units, 35% floor area increase from 541,330 square feet to 730,796 square feet, and floor area averaging over the 10 contiguous lots and three commercial zones of the Project Site. (LAMC 12.22.A.25(g)(2) and/or LAMC 11.5.11)
3. **Site Plan Review (SPR).** Site plan review for any development project which creates, or results in an increase of 50 or more dwelling units or guest rooms. (LAMC 16.05.C.1.)

4. **Vesting Conditional Use (VCU).** A Vesting Conditional Use Permit for a hotel in a C4 zone within 500 feet of an R zone. (LAMC 12.24.T.)
5. **Conditional Use (CUB).** A Conditional Use to permit the sale or dispensing for consideration of alcoholic beverages, including beer and wine, for consumption on the premises. (LAMC 12.24.W.1).
6. **Development Agreement (DA).** A Development Agreement (DA) between the City of Los Angeles (City) and the Applicant will be prepared pursuant to Government Code Sections 65864-65869.5.
7. **Vesting Tentative Tract Map (VTT).** A merger and re-subdivision of the Project Site for airspace subdivision purposes, including any necessary vacations and haul routes. (LAMC 17.15).
8. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, revocable permits, building permits and other Department of City Planning approvals.

APPLICANT:

Walter and Aeshea Jayasinghe Family Trust

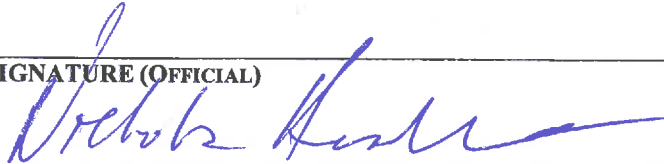
PREPARED FOR:

Los Angeles Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

SIGNATURE (OFFICIAL)



DATE

January 18, 2017

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CITY OF LOS ANGELES

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

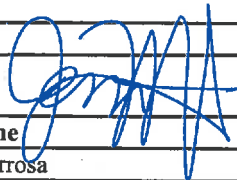
- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gases | <input type="checkbox"/> Population and Housing |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Transportation and Traffic |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Geology and Soils | <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Utilities and Service Systems |
| | | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that 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 the 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



Date

12 - 29 - 16

Printed Name

Jenna Monterrosa

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

BACKGROUND

PROPOSER NAME

Walter and Aeshea Jayasinghe Family Trust

PHONE NUMBER

(213) 413-4046

PROPOSER ADDRESS

1930 Wilshire Boulevard, Ste. 1100, Los Angeles, California 90057

AGENCY REQUIRING CHECKLIST

City of Los Angeles Department of City Planning

DATE SUBMITTED

December 2016

PROPOSAL NAME (If Applicable)

The Lake on Wilshire

ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project result in:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. HYDROLOGY AND WATER QUALITY. Would the proposal result in:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. NOISE. Would the project:				
a. Result in 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. PUBLIC SERVICES.				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. TRANSPORTATION AND TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Mitigation Measures (MM), Regulatory Compliance Measures (RCM), and Project Design Features (PDF)

1. AESTHETICS

Regulatory Compliance Measures

RCM-1-1 Vandalism

The project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15.

RCM-1-2 Signage on Construction Barriers

The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

RCM-1-3 Aesthetics (Landscape Plan)

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

Project Design Features

PDF-1-1 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

PDF-1-2 Aesthetics (Glare)

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective glass to minimize glare and reflected heat. Low-E (low emissivity) glass shall be permitted.

2. AGRICULTURE AND FORESTRY RESOURCES

None required.

3. AIR QUALITY

Regulatory Compliance Measures

RCM-3-1 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

RCM-3-2 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

RCM-3-3 In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RCM-3-4 In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Mitigation Measures

MM-3-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by ARB.

Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided.

- MM-3-2** Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.
- MM-3-3** Require the use of architectural coatings that average 50 g/L VOC content for interior applications and 75 g/L VOC content for exterior applications.
- MM-3-4** Ensure a minimum of seven months for application of architectural coatings to ensure daily emissions don't exceed 75 lb/day of VOC.

4. BIOLOGICAL RESOURCES

Mitigation Measure

MM-4-1 Tree Removal

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

5. CULTURAL RESOURCES

Mitigation Measure

MM-5-1 Historic Resources

1. The applicant shall engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to oversee the design development and construction for compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant shall conduct on-site construction monitoring throughout the construction phase.

2. The Project shall include a shoring plan to ensure the protection of the Wilshire Medical Building at 1930 Wilshire Boulevard during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

MM-5-2 The Project shall include an onsite interpretive display commemorating the history of the Wilshire Medical Building at 1930 Wilshire and its historic significance. This display may include historic photos, drawings and text.

Regulatory Compliance Measure

RCM-5-1 Archaeological

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

RCM-5-2 Paleontological

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

RCM-5-3 Human Remains

If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall

occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

6. GEOLOGY AND SOILS

Regulatory Compliance Measure

RCM-6-1 Liquefaction Area

The Project shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5 Liquefaction Potential and Soil Strength Loss.

RCM-6-2 Geotechnical Conditions

The Project shall comply with the recommendations and conditions contained within the Geotechnical Report for the Project, and as it may be subsequently amended or modified.

The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

Mitigation Measure

MM-6-1 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- The Project shall prepare a Grading Plan that shall conform with the City of Los Angeles Department of Building and Safety Grading Division's Landform Grading Manual Guidelines.
- Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 shall be provided to the satisfaction of the Los Angeles Department of Building and Safety.

7. GREENHOUSE GAS EMISSIONS

None required.

8. HAZARDS AND HAZARDOUS MATERIALS

Project Design Feature

PDF-8-1 Human Health Hazard (Vector Control)

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

PDF-8-2 Temporary construction fencing and sheeting typical for a demolition and construction project shall be placed along the periphery of the active construction areas to reduce dust and other emissions from the Project Site.

Regulatory Compliance Measures

RCM-8-1 Explosion/Release (Existing Toxic/Hazardous Construction Materials)

(Asbestos) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM)

are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

(Lead Paint) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

(Polychlorinated Biphenyl) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

Mitigation Measure

MM-8-1 Soil Management Plan

The Project shall comply with the recommendations and conditions contained within the Soils Management Plan prepared by EFI Global, dated August 19, 2016 for the Project, and as it may be subsequently amended or modified.

MM-8-2 Emergency Evacuation Plan

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

9. HYDROLOGY AND WATER QUALITY

Regulatory Compliance Measures

RCM-9-1 National Pollutant Discharge Elimination System General Permit

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and

implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

RCM-9-2 Low Impact Development Plan

Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-9-3 Development Best Management Practices

The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

RCM-9-4 Waste Discharge Requirements (WDR)

The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the project would have to obtain coverage under this permit.

10. LAND USE AND PLANNING

None required.

11. NOISE

Regulatory Compliance Measures

RCM-12-1 Demolition, Grading, and Construction Activities

- The project shall comply with the City of Los Angeles Noise Ordinance No. 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 Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measures

- MM-12-1** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- MM-12-2** All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.
- MM-12-3** All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.
- MM-12-4** Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- MM-12-5** At all Project boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound walls with acoustical blankets) shall be erected to obstruct line-of-sight noise travel from the Project site to all Project receptors.

13. POPULATION AND HOUSING

None required.

14. PUBLIC SERVICES

Regulatory Compliance Measures

RCM-14-1 Fire Flows and Hydrants

The Project shall submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then onsite or offsite upgrades to the existing infrastructure, as determined by the LADWP and LAFD shall be required by the applicant.

RCM-14-2 Public Services (Fire)

The Project shall comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit.

RCM-14-3 Payment of School Development Fee

Prior to issuance of a building permit, the Project Applicant shall pay all applicable school facility development fees in accordance with California Government Code Section 65995.

RCM-14-4 Recreation (Increased Demand for Parks or Recreational Facilities)

If the applicant seeks a certificate of occupancy for apartments, then the following applies: (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

Mitigation Measures

MM-14-1 Public Services (Police – Demolition/Construction Sites)

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

MM-14-2 Public Services (Police)

The plans shall incorporate a design that enhances the security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM-14-3 Upon completion of the Project, the Rampart Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

MM-14-4 Public Services (Construction Activity Near Schools)

The developer shall maintain ongoing contact with administrators of Camino Nuevo Charter Academy, Esperanza Elementary School, and Liechty Middle School. The administrators shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school are maintained. The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

15. RECREATION

None required.

16. TRANSPORTATION/TRAFFIC

Regulatory Compliance Measure

RCM-16-1 The Project shall comply with the conditions contained within the Department of Transportation's Approval Letter for the Project, as it may be subsequently amended or modified.

RCM-16-2 Parking Area and Driveway Plan

The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents and provide code-required emergency access, to the Bureau of Engineering and the Department of Transportation for review and approval.

Mitigation Measure

MM-16-1 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

17. TRIBAL CULTURAL RESOURCES

See Mitigation Measures 5-1 and 5-2.

18. UTILITIES AND SERVICE SYSTEMS

Regulatory Compliance Measure

RCM-18-1 Fire Water Flow

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Project, and will contact a Water Service Representative at the LADWP to order a Sewer Availability Request (SAR). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

RCM-18-2 Water Efficiency Requirements

The Project shall implement all applicable mandatory measures of Ordinance No. 180,822 (Water Efficiency Requirements for New Development), the 2014 LA Plumbing Code, 2013 Cal Green Building Code, and 2014 LA Green Building Code the LA Green Building Code that would have the effect of reducing the Project's water use.

RCM-18-3 Landscape

The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or

evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM-18-4 LID Ordinance and Stormwater BMPs

The Project shall comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

RCM-18-5 Designated Recycling Area

In compliance with Los Angeles Municipal Code, the proposed Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

RCM-18-6 Construction Waste Recycling

In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

RCM-18-7 Commercial/Multifamily Mandatory Recycling

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

RCM-18-8 The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

RCM-18-9 The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

- RCM-18-10** The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

Mitigation Measures

MM-18-1 Wastewater Service

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

MM-18-2 Water Service

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan.

19. MANDATORY FINDINGS OF SIGNIFICANCE

None required.

2. PROJECT DESCRIPTION

The section is based in part on the following item, included as Appendix A of this IS/MND:

A Plans, Archeon Group, December 2016.

Introduction

Project Title: The Lake on Wilshire

Case Numbers: ENV-2016-3244-MND
CPC-2016-3142-PGA-ZC-VCU-CUB-DB-SPR
CPC-2016-3143-DA
VTT-74297

Project Location: 1930 West Wilshire Boulevard, Los Angeles, CA 90057

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 763, Los Angeles, California 90012

City Staff Contact: Jenna Monterrosa, City Planner
(213) 978-1377 and jennafer.monterrosa@lacity.org

Project Applicant: Walter and Aeshea Jayasinghe Family Trust
1930 Wilshire Boulevard, Ste. 1100, Los Angeles, California 90057

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed 1930 Wilshire Project (the Project), which consists of the redevelopment of a 1.64 acre site by converting an existing 14-story medical office building into a new hotel and construction of a new learning, cultural and performing arts center, residential tower and related parking.

CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

MITIGATED NEGATIVE DECLARATION

“Mitigated negative declaration” means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

According to CEQA Guidelines Article 6, Negative Declaration Process:

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

15071. CONTENTS

A Negative Declaration circulated for public review shall include:

(a) A brief description of the project, including a commonly used name for the project, if any;

(b) The location of the project, preferably shown on a map, and the name of the project proponent;

(c) A proposed finding that the project will not have a significant effect on the environment;

(d) An attached copy of the Initial Study documenting reasons to support the finding; and

(e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

Project Location

The Project is located south of Wilshire Boulevard between South Westlake Avenue and South Bonnie Brae Street at 1930 West Wilshire Boulevard, Los Angeles, 90057, in the Westlake Community Plan area (Project Site). See Figure 1, Regional Map, for the location within the context of the City. See Figure 2, Aerial Map, for the Project Site and surrounding areas.

Regional Setting

The Westlake Community Plan (WCP) area is located south of the Hollywood Freeway (Interstate 101) and north of the Santa Monica Freeway (Interstate 10). The WCP is surrounded by the communities of Wilshire, Silverlake-Echo Park, Central City and South Los Angeles. The area is comprised of several sub-areas, the most prominent areas being Central City West, Pico-Union and MacArthur Park.

The WCP contains approximately 1,900 acres, which is less than one percent of the land in the City of Los Angeles. As one of the oldest communities in the city, Westlake has a diagonal grid pattern that is shifted slightly from the downtown grid. Residential development is almost entirely multifamily. Concentrations of single-family homes can be found between First and Temple Streets and for a few blocks north of Pico Boulevard and east of Alvarado Street. Mixed residential areas occur in scattered locations south of Pico Boulevard and west of Alvarado Street. Multi-family housing is concentrated between Wilshire Boulevard and First Street, and can be found in scattered locations in the plan area. Westlake contains a substantial amount of commercial development. Commercial activity is concentrated in a district extending from Wilshire Boulevard on the north to Olympic Boulevard on the south through the entire plan area. Wilshire Boulevard consists of a mix of mid-rise and low-rise buildings with some pedestrian oriented activity. MacArthur Park has historically been a focus for pedestrian activity. Low-rise commercial corridors consisting of mixed building types are located along Temple Street, Beverly Boulevard, Third Street and Pico and Washington Boulevards. A narrow industrial corridor is located along Venice Boulevard east of Hoover Street and along the Harbor Freeway south of Olympic Boulevard. Westlake also has an impressive collection of older historic buildings although many are in a state of deterioration. The ability to restore these buildings is hampered by a costly and long regulatory process, accentuated by the high degree of absentee owners. The Westlake community is comprised of several main areas each with special planning priorities and concerns. The MacArthur Park area is bounded by Sixth Street to the north and Seventh Street to the south, and Witmer Street to the east is the commercial hub and heart of Westlake. Many of the activities surrounding the park cater to the predominantly Latino population of Westlake. A Red Line Metro Rail Station is located across from the park on Alvarado Street. MacArthur Park is the largest public open space in the WCP area. The MacArthur Park area is also one of eight special vending districts established by ordinance in 1994. The Ordinance establishes a two-year trial period for the establishment of specific sidewalk vending districts and sets criteria for community input, approval and implementation.¹

Regional and Local Access

Regional access is provided by the CA-110 Freeway approximately 1 mile southeast of the Project Site, and the US-101 Freeway is located approximately 1.2 miles north of the Project Site. Local access is provided by Wilshire Boulevard to the north, South Westlake Avenue to the west, South Bonnie Brae

¹ Westlake Community Plan: <http://cityplanning.lacity.org/complan/pdf/wlkcptxt.pdf>.

Street to the east and 7th Street to the south. The Mobility Plan 2035 provides the following street designations:

Wilshire Boulevard: Avenue II

South Westlake Avenue and South Bonnie Brae Street: Local Street Standard

7th Street: Avenue II

Public Transit

The Project Site is one block east of the Metro Red and Purple Line Westlake/MacArthur Park Station. Metro bus lines 20, 200, 603, and Rapid 720 and Foothill Transit bus line 481 serve the corner of Wilshire Boulevard and Alvarado Street, approximately one block east. Metro bus lines 487/489 and 603 and Los Angeles Department of Transportation DASH Pico Union/Echo Park line serve the corner of Westlake/MacArthur Park Station. Metro bus line 20 and Foothill Transit bus line 481 serve the corner of Wilshire Boulevard and Bonnie Brae Street. Additional bus lines include Metro lines 16, 18, 28, 51/52, 66, 316, 352, 728 and LADOT DASH CE 534.²

Site Characteristics

Table 2-1 provides information about the Project Site. The Project Site is approximately 70,912 square feet (1.64 acres) and located in the Westlake Community Plan and in the Westlake Recovery and Redevelopment Project area. The Project Site is subject to Zoning Information (ZI) ZI-2374 Los Angeles State Enterprise Zone, ZI-2275 Westlake Recovery Redevelopment Project, and ZI-2452 Transit Priority Area in the City of Los Angeles.

Existing Uses

The Project Site contains an existing approximately 14-story 115,560 square-foot medical office building and surface parking, with 168 parking spaces. Currently, approximately 104,000 square feet of the building is occupied (30,000 square feet office and 74,000 square feet medical office).³ The existing building was originally known as the Wilshire Medical Building and later also known as the Crocker Bank Building and is a designated historic resource (the individual property is eligible for the National Register by a consensus through Section 106 process and is listed in the California Register with Status Code 2S2).⁴

² Page 15, *Traffic Study*, July 2016.

³ Page 1, *Traffic Study Memorandum of Understanding*, June 2016.

⁴ Page 32, *Historic Resources Technical Report*, June 2016.

Table 2-1
Project Site

Address	APN	Zone / Height District	General Plan Land Use Designation	Size (sf)
1930, 1932, 1936 West Wilshire Boulevard 654, 658 South Westlake Avenue	5142-002-019	C4-2	Regional Center Commercial	6,000
1926, 1928 West Wilshire Boulevard				6,000
1920 West Wilshire Boulevard				6,000
None		C2-2	Community Commercial	750
660 South Westlake Avenue				7,500
668 South Westlake Avenue				7,500
None	5142-002-022	C4-2 / C2-2 / C2-4	Regional Center Commercial Community Commercial	3,374.9
None	5142-002-018	C4-2	Regional Center Commercial	1,500
				1,502.6
1908, 1914 West Wilshire Boulevard				3,750
1900 Wilshire Boulevard, 657 Bonnie Brae Street				3,757.1
None				750.7
659, 661 South Bonnie Brae Street				6,757.2
None		C2-4	Community Commercial	750.8
665, 667 South Bonnie Brae Street				7,508.8
669, 671 South Bonnie Brae Street				7,509.5
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org , December 2016.				

Surrounding Uses

North: across Wilshire Boulevard are several commercial buildings in an area zoned C4-2:

1925 West Wilshire Boulevard is a 2- and 3-story office building.

1907-1909 West Wilshire Boulevard is a 1-story office building.

1901-1905 West Wilshire Boulevard is a 3-story building with retail use on level 1 and residential uses on levels 2 and 3.

South: directly south is a 4- and 5-story residential building with ground floor retail along Westlake Avenue. The area is zoned C2-2 and C2-4.

West: across Westlake Avenue is a 10-story medical office building. The area is zoned C4-2 and C1-2.

East: across Bonnie Brae Street are several commercial and office buildings in an area zoned C4-2 and C2-2:

1830 West Wilshire is a 2-story retail and office building.

658 South Bonnie Brae Street is a 2-story office building.

660 South Bonnie Brae Street is a 2-story building used as the Peoples College of Law.

666 South Bonnie Brae Street is a 4-story residential building that is abandoned and vacant.

Sensitive uses in the area include:

681 South Bonnie Brae Street is a residential development adjacent to the south of the Project Site.

1905 West Wilshire Boulevard is a residential apartment building, approximately 90 feet north of the Project Site, across Wilshire Boulevard.

2000 West Wilshire Boulevard is a medical office building, approximately 60 feet west of the Project Site, across Westlake Avenue.

676 South Bonnie Brae is the Mid-Wilshire Convalescent Hospital, approximately 60 feet southeast of the Project Site, across Bonnie Brae Street.

Proposed Project

The existing building on the Project Site will be converted to a hotel with up to 220 rooms. New construction will include a residential building with up to 478 units (up to 120 studio units, 240 1-bedroom units, and 118 2-bedroom units) and a new learning, cultural and performing arts center of approximately 69,979 square feet that will include an 850-seat theater and a classroom/dance studio space capable of accommodating up to 50 students. The hotel will contain a ground-floor bar (1,351 square feet with 32 seats), ground floor restaurant (3,582.3 square feet with 176 seats), and a rooftop deck (4,358 square feet with 100 seats). The cultural center will contain a rooftop bar (2,820 square feet with 88 seats). See Figure 3, Site Plan, for the overall plan of the Project. Additional floor plans, renderings, elevations, and sections are included as Appendix A to this MND.

Floor Area and Density

The Project Site lot area is approximately 70,912 square feet allowing approximately 354 units. The Project is seeking a 35% Density Bonus to add 124 units, for a total of 478 units.

The floor area allowed at the Project Site is approximately 541,330 square feet. The Project is seeking an increase of 35% of floor area to add approximately 189,466 square feet, for a total of approximately 730,796 square feet. The existing building is approximately 115,560 square feet, but will be reduced to

approximately 99,679 square feet at the completion of the adaptive reuse portion of the Project, which leaves approximately 631,117 square feet of remaining floor area for the Project's new construction. The new residential tower will be approximately 514,887 square feet, and the new learning, cultural and performing arts center will be approximately 69,979 square feet, for a total of approximately 584,866 square feet of new development floor area.

Height

The Project Site is located in Height Districts 2 and 4. There are no height restrictions for the C2 and C4 zones, but a floor area ratio (FAR) limit of 6:1 applies to Height District 2 and 13:1 to Height District 4. The existing building that will be converted to a hotel will be approximately 178 feet in height (14 stories). The parking structure will be approximately 105 feet in height (10 stories). The learning, cultural and performing arts center will be approximately 120 feet in height (5 stories). The residential tower will be approximately 458 feet, 9 inches in height (41 stories).

Open Space

Table 2-2, Open Space, provides the amount of required open space and the amount provided.

**Table 2-2
Open Space**

Amount Required			
Use	Amount (units)	Rate	Total
Studio	120	100 sf / unit	12,000
1 bedroom	240	100 sf / unit	24,000
2 bedroom	118	125 sf / unit	14,750
Total Required			50,750
Amount Provided			
Common Open Space including community room and courtyard			50,497
Private Open Space, including private decks			12,000
Total Provided			62,497
<i>In square feet. Per LAMC Section 12.21 G.2.</i>			
<i>Source: Archeon Group, December 2016.</i>			

Access

Vehicle access will be provided by a two-way (entrance and exit) driveway on South Westlake Avenue for the hotel and culture center uses to two levels of subterranean parking, and on South Bonnie Brae Street for the residential uses to a 10-level parking structure (eight (8) levels above ground and two (2) levels subterranean/below ground). Pedestrian access to the hotel lobby and culture center will be on Wilshire Boulevard, and to the residential lobby on South Bonnie Brae Street.

Parking

Table 2-3, Vehicle Parking, provides the amount of required and provided parking. Parking would be provided in a 12-level parking garage that contains two subterranean levels and 10 above ground levels.

**Table 2-3
Vehicle Parking**

Amount Required		
Use	Required	With 15% Reduction
Residential	596	507
Commercial	496	425
Total	1,092	932
Amount Provided		
Total Provided		933
<i>Source: Archeon Group, December 2016.</i>		

Bicycles

Los Angeles Municipal Code (LAMC) 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. A hotel is required to provide one short term bicycle space per 20 guest rooms and one long term bicycle space per 20 guest rooms. Commercial uses require one short term and one long term bicycle space per 2,000 square feet of floor area. Residential uses require that long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest room and short-term bicycle parking shall be provided at a rate of one per ten dwelling units or guest rooms. Short term bicycle parking consists of bicycle racks that support the bicycle frame at two points. Long term bicycle parking is secured from the general public, is enclosed on all sides and protects bicycles from inclement weather. The Project will provide, at a minimum, 106 short term and 523 long term bicycle spaces.⁵

Landscaping (Residential)

The Project Site has landscaping and trees along the periphery of the Project Site, in the courtyard area behind the existing building, and on the roof. The Project Site currently has 95 trees, including 17 street (sidewalk) trees and 78 onsite trees. The Project would remove 79 trees (one street tree and 78 onsite trees) and replace them per the City's Tree Replacement Program.

Vacations

Balconies will project into the right-of-way (ROW) of the street by approximately 5' along a portion of Wilshire Blvd and those projections will need to be approved as airspace vacations that will be processed

⁵ Archeon Group, December 2016.

with the Final Tract Map. There will be two balcony airspace vacations processed with the map. In addition, a vacation of approximately 7' of a remnant piece of alley no longer necessary also will be vacated together with the Tract Map.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).⁶

The Project is redefining the district with sustainability-focused neighborhood development. The Project will bring new life, transportation and commerce to Los Angeles' Westlake/MacArthur Park area. The Project is being designed to exemplify a regenerative urban ecology in which the highest level of environmental, social, cultural and economic sustainability applied. The design will bring an inside-outside element to the Project with lots of natural lighting, healthy building materials and under-floor delivery of heating, cooling and ventilation, including the capability to bring 100 percent filtered outside air to the inside.

The residential tower is being designed to be highly energy efficient, at a LEED Gold certificate level. A double-skin facade will be a major component of the building envelope to trap air between each layer, helping insulate the building and reduce the need for heating or cooling. Daylighting, orientation, solar gain and local climate are all being taken into account during the design of the building to maximize light and minimize heat gain. Over 13-foot high ceilings and 10-foot high continuous clear glass will provide abundant daylight and a sense of openness and freedom. The residences will be designed to receive an abundance of natural light, and artificial lights will be sensor activated. Water-saving features include rainwater capturing and filtering along with other sustainable measures that will curb potable water use, such as using cistern captures and storing rainwater. The Project will promote sustainability through transportation demand management, advanced building technologies, operational changes, and local partnerships. Below are details of environmental benefits of the Project.

Building Design & Features. The Project is designed to exemplify a regenerative urban ecology in which the highest level of environmental, social, cultural and economic sustainability will be applied:

- Natural daylighting, orientation, solar gain and local climate to maximize light and minimize heat gain;
- Efficient fixtures and appliances, task lighting, dimmable electronic ballasts, occupancy sensors and extra insulation;
- Low-flow plumbing fixtures and reclaimed water storage system;
- Greywater-ready to reclaim shower and sink water to irrigate landscaping and flush toilets;

⁶ Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>.

- On-site reclamation of water, rainwater and recycled water from the building to be reused in water gardens and cooling building systems.

Building Technology. State-of-the-art construction practices decrease the Project's environmental footprint:

- Sustainable design to meet LEED Gold certification level;
- Orientation and design for daylighting and natural ventilation;
- Use of recycled, renewable, locally sourced, non-toxic, and reclaimed materials;
- Low impact development measures;
- Building Automation Systems implemented for the automatic centralized control of a building's heating, ventilation and air conditioning, lighting and other systems to improve occupant comfort, efficient operation of building systems, and reduction in energy consumption and operating costs, and improve life cycle of utilities;
- Installation of energy efficient lighting and occupancy sensors.

Operations. The Project operations reduce impacts to the environment and the community:

- Electric vehicle charging stations in the parking structure;
- Drought tolerant native landscaping (all uses);
- Rooftop garden and green roof on the parking podium terrace, residential building, cultural building, and hotel building;
- Sustainable operations to meet LEED standards for existing buildings to remain (hotel building);
- Linen and towel reuse program (hotel);
- Water and energy savings plan (all uses);
- Comprehensive recycling program (all uses);
- Biodegradable cleaning products (all uses);
- Reusable large shampoo and condition bottles that are cleaned and resealed to limit waste associated with small disposable bottles (hotel);
- Ozonized Laundry System; reducing energy costs, hot water consumption, drying time, along with chemical and detergent use (hotel);
- Commitment to purchasing sustainable, eco-friendly products whenever possible (all uses);
- Locally sourced food and beverage (hotel and cultural uses);
- Compost kitchen waste (hotel and cultural uses);

- Recycle fryer oil (hotel and cultural uses).

Transportation Demand Management (TDM). The TDM reduces vehicle-miles traveled (VMT) of Project patrons through increased alternative transportation options:

- Long-Term and Short-Term bike stations and bike sharing facilities for public use;
- Car share (i.e.: Zip Car or equivalent) located on-site;
- Incentives for employees utilizing carpools and/or public transit could include discounted transit passes and ride-sharing matching;
- Incentives for employees to use public transit, carpool, bike or walk to work;
- Bicycle and skateboard rental for hotel guests.

Local Partnerships. Partnerships will be initiated to ensure that the Project supports the Westlake/MacArthur Park community:

- Donate excess food to local food bank;
- Provide Environmental Literacy Course, such as importance of recycling and water & energy conservation;
- Local hiring program and job fair;

Construction Information

The estimated construction schedule is shown in Table 2-4, Construction Schedule. Operation could begin in 2020.⁷ Demolition will remove approximately 2,500 cubic yards of building. The amount of soils removed or exported would be approximately 90,000 cubic yards (cy).⁸ The Project will contain two (2) subterranean levels (approximately 35 feet below grade) in addition to any other excavation typically required for foundation and utility work.

The estimated 90,000 cubic yards of excavation would be accommodated by approximately 6,429 trucks (assuming 14 cy per truck)⁹ over a period of 3 month (60 work days), or approximate 107 truck trips per day, on average.

Truck haul routes are expected to utilize the most convenient access to freeway ramps. The haul routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions.

⁷ Page 1, Traffic Study Memorandum of Understanding, June 2016.

⁸ Client provided information, May 2016.

⁹ $90,000 / 14 = 6,429$

Trucks traveling to and from the Project Site must travel along the designated routes. It is anticipated that the demolition and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. The estimated haul route is approximately 25 miles and will generally include: Wilshire Boulevard to Alvarado Street to US-101 North to I-170 freeway North to I-5 freeway North to Sepulveda Boulevard to San Fernando Road to Sunshine Canyon Landfill.

Table 2-4
Construction Schedule

Phase	Schedule	Duration
Demolition	Month 1 to 3	2 months
Site Prep	Month 3	1 month
Grading and Excavation	Month 4 to 7	3 months
Adaptive Reuse of Existing Building to Hotel	Month 8 to 32	24 months
Core/shell Construction	Month 8 to 32	24 months
Finishing and Tenant Improvements	Month 25 to 32	7 months
<i>Construction schedule, including start, end, and duration dates are estimates only. Client provided information, November 2016 Table: CAJA Environmental Services, November 2016.</i>		

Project Objectives

The objectives of the Project are as follows:

- Provide a learning, cultural and performing arts center that benefits the surrounding community.
- Revitalize an under-utilized site in a former redevelopment area with a smart-growth opportunity mix of hotel, residential and cultural uses.
- Support infill development and redevelopment in existing urban areas to reduce “greenfield” development and urban sprawl.
- Provide residential uses near the retail and office uses along Wilshire Boulevard.
- Provide a lodging option for leisure and business travelers, tourists and visiting friends and relatives of local residents with a hotel concept in Westlake area with proximity to some of the region’s most popular tourist, cultural and entertainment destinations in LA.
- Provide high density residential, cultural and hotel uses near mass transit options, including the Metro Red/Purple Line Station.
- Provide readily accessible and easily identifiable centrally located residential, hotel and cultural facilities in order to provide visitors and residents with a convenient and pleasant experience.

- Activate the stretch of Wilshire Boulevard with new culture and community uses.
- Provide housing that contributes towards the City's Regional Housing Needs Assessment.
- Leverage the billions of public investment dollars on local transit facilities and infrastructure, including the Metro Red/Purple Line station, which is located one block away.
- Contribute to the economic recovery of the City by developing hotel use that generates local tax revenues (transit occupancy tax / bed tax relief), provide employment opportunities, with employees who support local businesses, including dining, shopping and entertainment venues nearby.

Discretionary Actions

The Project will require approval of the following discretionary actions:

1. **General Plan Amendment (GPA).** General Plan Amendment to change the split Regional Center Commercial and Community Commercial land use designations and to apply the Regional Center Commercial land use designation to the entire site, and to exempt a portion of the Project Site (approximately 16,556 square feet of the 70,906 square-foot Project Site) from Community Plan Footnote No. 2, which limits certain areas to Height District No. 2.
2. **Density Bonus (DB).** A 35% density bonus to increase the unit density from 354 units to 478 units, 35% floor area increase from 541,330 square feet to 730,796 square feet, and floor area averaging over the 10 contiguous lots and three commercial zones of the Project Site. (LAMC 12.22.A.25(g)(2) and/or LAMC 11.5.11).
3. **Site Plan Review (SPR).** Site plan review for any development project which creates, or results in an increase of 50 or more dwelling units or guest rooms. (LAMC 16.05.C.1.).
4. **Vesting Conditional Use (VCU).** A Vesting Conditional Use Permit for a hotel in a C4 zone within 500 feet of an R zone. (LAMC 12.24.T.).
5. **Conditional Use (CUB).** A Conditional Use to permit the sale or dispensing for consideration of alcoholic beverages, including beer and wine, for consumption on the premises. (LAMC 12.24.W.1).
6. **Development Agreement (DA).** A Development Agreement (DA) between the City of Los Angeles (City) and the Applicant will be prepared pursuant to Government Code Sections 65864-65869.5.
7. **Vesting Tentative Tract Map (VTT).** A merger and re-subdivision of the Project Site for airspace subdivision purposes, including any necessary vacations and haul routes. (LAMC 17.15).
8. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, revocable permits, building permits and other Department of City Planning approvals.

Pursuant to various sections of the Los Angeles Municipal Code, the applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring,

grading, foundation, haul route, building and tenant improvements. This MND is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This MND is also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above.

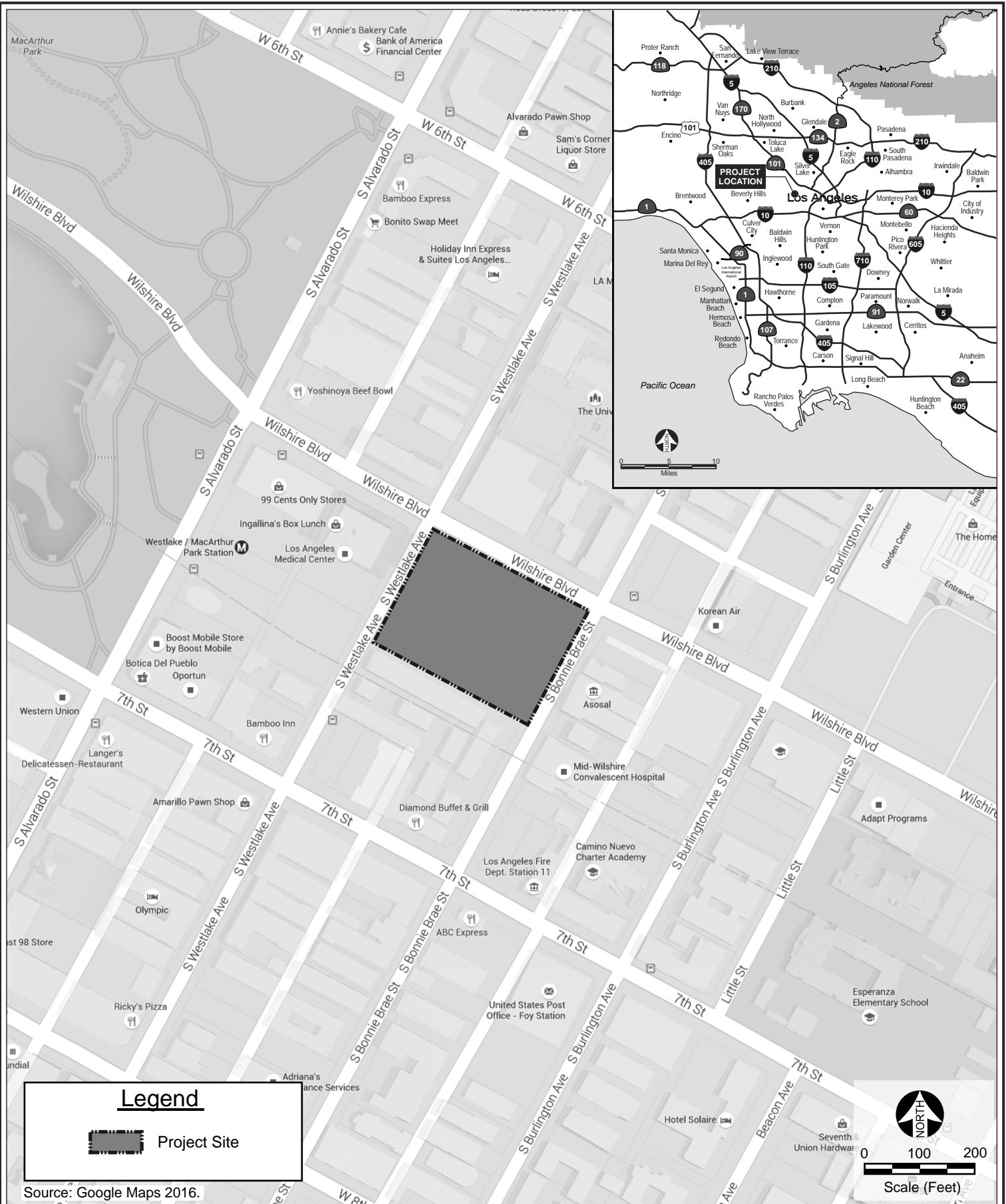
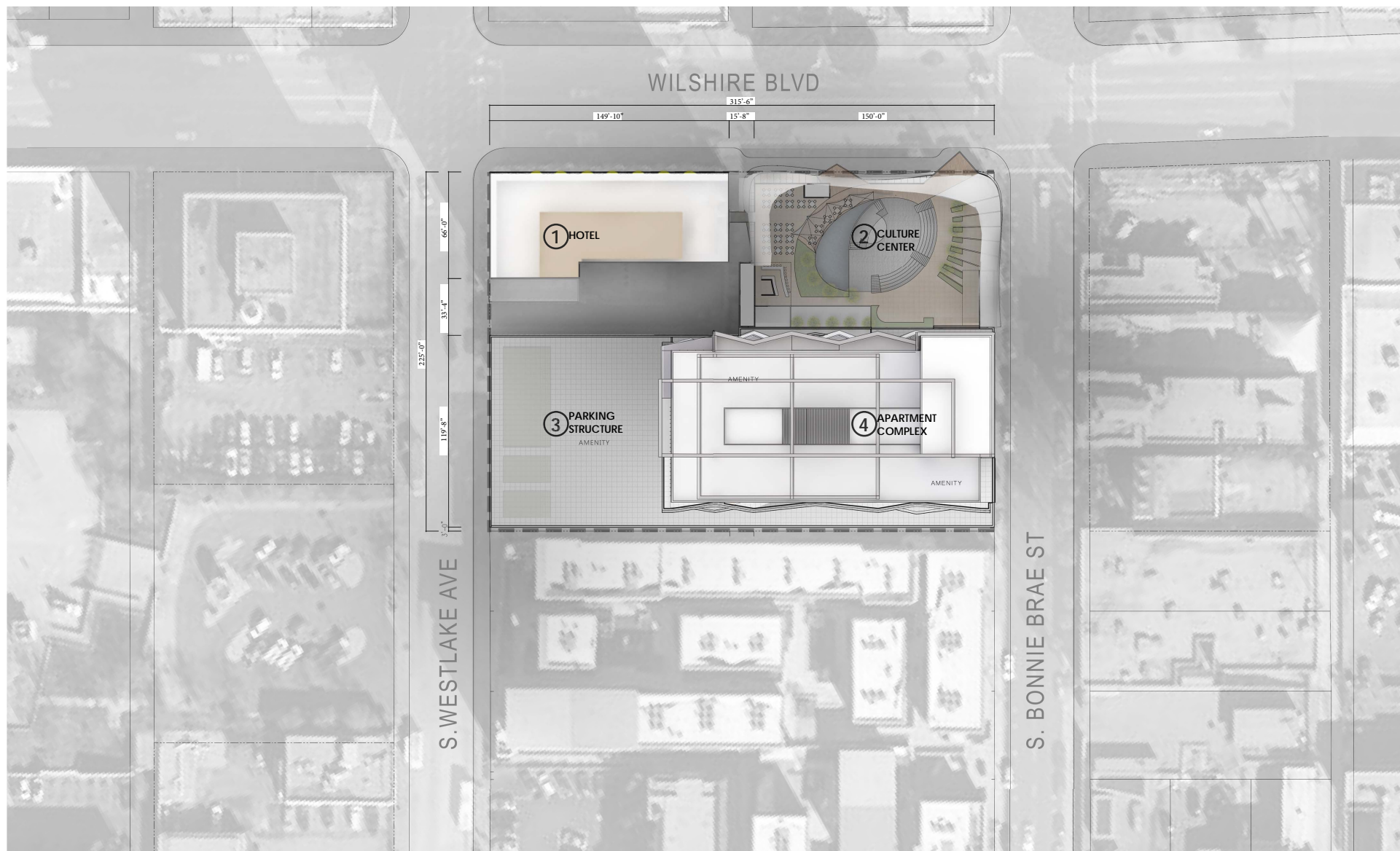




Figure 2
Aerial Map



Source: Walter J. Company, 2016.



3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

The section is based in part on the following item, included as Appendix B of this IS/MND:

B Shade Study, Archeon, June 2016.

This analysis is provided herein for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743,¹ effective January 1, 2014, amended CEQA in pertinent part to add Public Resources Code Section 21099 to provide that the aesthetics of a project that is a mixed-use residential project on an infill site within a transit priority area shall not be considered a significant impact under CEQA.² The City has issued Zoning Information (ZI) No. 2452, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts. The Project is a mixed-use residential project that includes residential uses, a hotel, and a learning, cultural and performing arts center.³ The Project Site is an infill site, which is defined in part as a lot located within an urban area that has been previously developed.⁴ As described in the Project Description, the Project Site is currently developed with a medical office use and surface parking. The Project Site is located within a transit priority area, which is defined in part as an area within one-half mile of an existing major transit stop.⁵ The Project Site is located one block east of the Metro Red and Purple Line Westlake/MacArthur Park Station (which is a major transit stop) as well as multiple Metro, LADOT and DASH bus lines.

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

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Project Site is in a mostly flat area of Westlake along a commercial corridor (Wilshire) and adjacent to residential uses (southwest of the Project Site). Other north/south streets are densely populated with multifamily residential neighborhoods. The existing visual character of the surrounding locale is highly urban, and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and

¹ SB 743: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743.

² California Public Resources Code Section 21099(a) and (d)(1).

³ LAMC Section 12.03.

⁴ California Public Resources Code Section 21099(a)(4).

⁵ California Public Resources Code Section 21099(a)(7).

structures on adjacent parcels. Due to the existing densely built environment, there are no views of MacArthur Park Lake.

There are no remarkable views, or scenic vistas in any direction. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.⁶ Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.⁷ There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Wilshire provides the major east-west view corridor. From the public sidewalks, there are views west approximately two blocks to Alvarado. Views east continue along the commercial corridor to Downtown Los Angeles. Views north and south are unremarkable showing the existing urban environment. These views would not be affected by the Project.

The approximate height of the proposed buildings (existing 14-story building to be converted to a hotel and a proposed 41-story residential building) would be taller than other structures in the area; however, there are no height restrictions. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. In addition, under SB 743 aesthetics shall not be considered as a significant impact under CEQA. Impacts will be less than significant.

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

Less Than Significant Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Pacific Coast Highway (State Route 1) is an “Eligible State Scenic Highway – Not Officially Designated” and is located approximately 2 miles west of the Project Site.⁸ The Project Site is not located

⁶ *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

⁷ *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

⁸ *California Scenic Highway Mapping Systems:* http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.

on a scenic highway.

The Project Site currently has 95 trees, including 17 street trees and 78 onsite trees. The Project would remove 79 trees (one street tree and 78 onsite trees) and will replace them per the City's Tree Replacement Program. There are no rock outcroppings on the Project Site. The Project will rehabilitate the Wilshire Medical Building at 1930 Wilshire Boulevard, which has been found eligible for listing in the National Register by consensus (Section 106 process) and is listed in the California Register (Status Code 2S2). Without appropriate mitigation to ensure that rehabilitation of the Wilshire Medical Building will conform to the Secretary of the Interior's Standards for Rehabilitation, the Project has the potential to result in a significant impact.⁹ However, with mitigation measures (see **Mitigation Measures 5-1** and **5-2** under Cultural Resources), impacts will be less than significant. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

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

Less Than Significant Impact. A significant impact may occur if a project introduces incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

Compatibility with Character of Surrounding Community

The Project will create a mixed-use development with a hotel, residential uses, and a learning, cultural and performing arts center approximately one mile from the business and tourist attractions of Downtown Los Angeles. The Project retains the passive visual open space aesthetic of the existing Project Site by including pedestrian passageways and connections within the interior of the Project Site, linking the physically separated buildings.

The Project features ground floor dining in the hotel and an entry plaza in the cultural center designed to activate the street and enhance the overall pedestrian experience. The Project proposes uses that will be similar to those already found in the area and will provide additional synergy with patrons, customers, and visitors. The hotel use will respond directly to the market demand for high-quality accommodations. The Project will improve the currently under-utilized parcel, as one-fourth of the Project Site is surface parking, generating customer opportunities for the existing businesses in the area. The Project will be compatible with and complementary to the surrounding community because it will combine a variety of uses that are complementary to those already found in the immediate area, and they will be connected on-site with pedestrian walkways. The Westlake Community Plan designates the area as Regional Center Commercial and Community Commercial, which serves as a transition between the commercial corridor along Wilshire Boulevard and residential uses south of the Site. A mixed-use development in a

⁹ *Historic Resources Technical Report, Historic Resources Group, June 2016.*

contemporary, visually integrated building would contribute to the characteristics of Westlake as a walkable, mixed-use urban district.

Architectural Style and Design

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of developments, and size. The area is not a collection of buildings unified by size, scale, or design. Buildings in the area generally range in height from one to three stories and have a wide variety of uses, including but not limited to hotels, theaters, apartment buildings, banks and other financial institutions, social clubs, restaurants, and retail; and have an eclectic assortment of architectural styles which extends from the vernacular to the highly ornamental. The area is characterized by a wide variety of building types and architectural styles, such as Moderne styles used for professional buildings and retail stores, Period Revival styles such as the Spanish Colonial Revival used for restaurants and hotels, and Exotic Revival styles used for theaters. Exterior cladding generally consists of stone, or a less substantial material meant to simulate stone such as terra cotta or scored plaster. The smaller buildings are typically of masonry construction and sheathed in stucco.

Balconies will project into the right-of-way (ROW) of the street by approximately 5' along a portion of Wilshire Blvd and those projections will need to be approved as airspace vacations that will be processed with the Final Tract Map. There will be two balcony airspace vacations processed with the map. These balconies, on the roof of the cultural center on level 10 (105' in height), will provide a scenic view of downtown Los Angeles for the Community. In addition, a vacation of approximately 7' of a remnant piece of alley no longer necessary also will be vacated together with the Tract Map. The balconies would be located above the ground level so and not impede pedestrian access along Wilshire and will add to the dynamic rhythm and visual interest of the façade along Wilshire. The alley vacation removes an alley that is not in use and is completely part of the Project Site and used as surface parking. It does not connect to any parcels that are not part of the Site. These balcony projections and alley vacation would not create a significant impact.

The existing building architectural style is Italian Renaissance Revival adapted for high-rise office and commercial/retail use. The existing building will be retained and converted to a hotel. The Project design for the new residential and cultural and performing arts center will resemble contemporary modern styles with vertical elements, large glass facades, and exposed colorful tiles. The corner of Wilshire Boulevard and Bonnie Brae Street will include an iconic statute as part of the cultural center entry plaza.

The new structures wrap around and above the existing building to be retained. Elevated walkways connect the cultural and performing arts center to the hotel building. The building layout, new building compositions, and material choice allow the retained building to maintain its historic identity while integrating it into the overall design of the Project. The Project will enhance the surrounding streetscape by incorporating a new modern design across what is currently a surface parking lot. Therefore, the Project would not degrade the existing visual character or quality of the site and its surroundings and impacts would be less than significant.

Other visual and aesthetic considerations

The Project includes rooftop amenity decks atop each component of the complex and the parking podium. The Project will offer; water features, outdoor pools, green open spaces, observation platforms with views toward Downtown Los Angeles. The Project seeks to incorporate sustainable water-sensitive urban outdoor greenery; helping mitigate the urban heat island effect and reducing runoff.

The Project will provide ground-level landscaping around the perimeter of the Project Site and courtyard areas, and roof-top landscaping will be provided for the learning, cultural and performing arts center, residential tower, and parking structure (as shown in Appendix A of this MND). The Project landscaping will be compliant with Los Angeles Municipal Code (LAMC) Sections 12.40 and 12.41. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. The Project shall comply with the LAMC, which includes the following provisions:

Regulatory Compliance Measures

RCM-1-1 Vandalism

The project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15.

RCM-1-2 Signage on Construction Barriers

The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

RCM-1-3 Aesthetics (Landscape Plan)

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

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

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which would pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site. As per ZI No. 2452 and SB 743, aesthetic impacts “shall not be considered significant impacts on the environment.”

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential and commercial uses. Vehicle headlights from traffic on Wilshire Boulevard contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The existing building on the Project Site has a minimum amount of window illumination, and an existing parking lot provides security lighting.

The Project will construct a 41-story building, and interior lighting through windows will increase. In addition, the hotel use of the Project will create additional lighting into the night hours. The Project will provide illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. The Project will comply with the City’s Walkability Checklist for building signage and lighting, including adequate lighting levels for safety, glare-free lighting to avoid harsh shadows, and using fixtures that are dark sky compliant.¹⁰

¹⁰ <http://urbandesignla.com/resources/docs/LAWalkabilityChecklist/lo/LAWalkabilityChecklist.pdf>

The Project will include architectural features and facades with a low level of reflectivity. The ground floor commercial and dining area will have low reflectivity to allow greater visual access into the building and appeal to a pedestrian aesthetic. Upper floor windows will be less visible to the pedestrian environment and will be suitably shielded to prevent visual trespass and allow privacy to the residential and hotel rooms. As such, the Project will not result in a substantial amount of light that would adversely affect the day or night time views in the project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized location in Westlake that is already illuminated at night, and the Project's lighting levels would be compatible with surrounding uses. However, exterior lighting that spills onto adjacent residential uses to the northeast could have a potentially significant impact. Exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. See also project design features below, which would ensure that lighting would be installed to minimize light trespass to off-site uses. Therefore, the change in levels of ambient illumination as a result of the Project will be less than significant.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project will add window and building surfaces to the Project Site. The increase in surfaces will have the potential to reflect light onto adjacent roadways and existing uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project will not be an all-glass façade but instead will have large colorful tiles on the cultural center and the residential building with windows that are broken up by the various building's articulation and balconies. The vehicle drop off and parking access on Westlake Avenue will lead to a driveway within the Project Site, which creates a light shield and prevents vehicle and building lighting from projecting upwards to the upper levels of the building. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. See also project design features below. Therefore, impacts resulting from glare generated by the Project will be less than significant.

Project Design Features

PDF-1-1 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

PDF-1-2 Aesthetics (Glare)

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective glass to minimize glare and reflected heat. Low-E (low emissivity) glass shall be permitted.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive.” Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice

“Solstice” is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria¹¹

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

¹¹ L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.

- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

Thresholds of Significance

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 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Sensitive Uses

Sensitive uses include the following: 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. There are sensitive uses to the northeast, north, northwest, and southeast of the Project Site, including those provided below:

- 681 South Bonnie Brae Street is a residential development adjacent to the south of the Project Site.
- 2000 West Wilshire Boulevard is a medical office building, approximately 60 feet east of the Project Site, across Westlake Avenue.
- 1905 West Wilshire Boulevard is a residential apartment building, approximately 90 feet north of the Project Site, across Wilshire Boulevard.
- 2000 West Wilshire Boulevard is a medical office building, approximately 60 feet west of the Project Site, across Westlake Avenue.
- 676 South Bonnie Brae is the Mid-Wilshire Convalescent Hospital, approximately 60 feet southeast of the Project Site, across Bonnie Brae Street.

Shadow Analysis

The Project height will be greater than 60 feet above the ground and is located near shadow-sensitive uses. Therefore, further analysis is provided. Shadows in the vicinity are created by the Project proposed uses and adjacent uses.

The difference between the shadow coverage created by existing uses on adjacent uses, as compared with the proposed Project determines whether the net change of the buildings on the Project Site create a significant impact. CEQA is concerned with the Project's impact on the environment, or the net change due to the Project. Environmental analyses net out the existing uses and take into account the surrounding existing uses that already are creating shadow impacts.

Summer Solstice

Appendix B to this MND contains summer shadows figures. At 9 AM, the Project buildings on the Project Site create medium-length shadows across Westlake Avenue to the southwest to the Metro Red Line parking and drop off parking lot (679 Westlake Avenue) and a small portion of the northwest corner of a residential building (676 Westlake Avenue) to the south. At 12 PM, the Project buildings create short-length shadows to the north that are largely contained on the Site and a small portion of Wilshire Boulevard. At 3 PM, the Project buildings create medium-length shadows to the northeast along Wilshire Boulevard to commercial and office buildings (1828 Wilshire Boulevard) across Bonnie Brae Street. At 6 PM, the Project buildings create long-length shadows to the east across Bonnie Brae Street to commercial and office buildings located at 658 Bonnie Brae Street. The Project would not create a shadow for more than 4 hours during the summer on a sensitive receptor. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA for projects such as the proposed Project. Therefore, impacts during summer solstice are less than significant.

Winter Solstice

Appendix B to this MND contains winter shadows figures. At 9 AM, the Project building on the Site creates long-length shadows to the northwest toward Alvarado and MacArthur Park. At 12 PM, the Project building creates medium-length shadows to the north across Wilshire toward residential and commercial uses (1925 Wilshire, 635 Westlake) along Westlake. At 3 PM, the Project building creates medium-length shadows to the northeast to residential buildings at 626 Bonnie Brae. The Project would not create a shadow for more than 3 hours during the winter on a sensitive receptor. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA. Therefore, impacts during winter solstice are less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

- a) **Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?**

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The Project Site is zoned C4 and C2, and the General Plan land use designation for the Site is Regional Center Commercial and Community Commercial. The Site is developed with a building and surface parking. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.¹² Therefore, the Project has no impact on the conversion of farmland to non-agricultural uses.

- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. 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.¹³ The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

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

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland will occur.

¹² State of California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, June 16, 2016.

¹³ State of California Department of Conservation, *Williamson Act Program*, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed June 16, 2016.

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

No Impact. The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

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

No Impact. A significant impact may occur if a project involves other changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

3. AIR QUALITY

The section is based in part on the following item, included as Appendix C of this MND:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, August 2016.

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

Less Than Significant Impact. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the Basin), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2012 AQMP on December 7, 2012.¹⁴ The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures through educational programs or fines, when necessary.

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O₃), nitrogen monoxide and dioxide (NO and NO₂), sulfur dioxide (SO₂), particulate matter 2.5 microns or less in diameter (PM_{2.5}), particulate matter ten microns or less in diameter (PM₁₀), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.¹⁵ The highest concentrations occur during the colder

¹⁴ SCAQMD, AQMP: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>.

¹⁵ Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.

months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x , the components of O_3 , are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Nitrogen Monoxide and Dioxide (NO and NO_2) like O_3 , is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_x and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10} . High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2 , NO_x , and VOC. Inhalable particulate matter, or PM_{10} , is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

- PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.
- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the California Air Resources Board (CARB). As required by the CAA, NAAQS have been established for seven major air pollutants: CO,

NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table 3.3-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O₃ and PM_{2.5}, attainment for PM₁₀, maintenance for CO, and attainment/unclassified for NO₂.

State

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 3.3-1. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table 3.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	/a/	0.075 ppm (147 µg/m ³)	Nonattainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Nonattainment	150 µg/m ³	Nonattainment
	Annual Arithmetic Mean	20 µg/m ³	Nonattainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Nonattainment
	Annual Arithmetic Mean	12 µg/m ³	Nonattainment	12 µg/m ³	Nonattainment

Table 3.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Maintenance
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Nonattainment	53 ppb (100 µg/m ³)	Maintenance
	1-hour	0.18 ppm (338 µg/m ³)	Nonattainment	100 ppb (188 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Nonattainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Attainment
/a/ CARB has not determined 8-hour O ₃ attainment status.					
Source: CARB, Ambient Air Quality Standards, and attainment status, accessed July 17 2016 (www.arb.ca.gov/desig/adm/adm.htm)					

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts creating the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour PM_{2.5} strategy standard.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals. In 2006, the City released its Los Angeles CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it did not set new thresholds of significance for air quality, the LA CEQA Thresholds Guide suggests a process for evaluating projects and attempts to standardize analyses through prescribed protocols.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO₂ react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains. Air quality problems also occur during the fall and winter, when CO and

NO₂ emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO₂ concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Sites are located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 3.3-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. During this three-year period, the one-hour State standard for O₃ was exceeded three times, the daily State standard for PM₁₀ was exceeded eight times, and the daily State standard for PM_{2.5} was exceeded five times. CO and NO₂ levels did not exceed the CAAQS from 2012 to 2014.

**Table 3.3-2
2012-2014 Ambient Air Quality Data In Project Vicinity**

Pollutant	Pollutant Concentration & Standards	Central Los Angeles County		
		2012	2013	2014
Ozone	Maximum 1-hour Concentration (ppm)	0.093	0.093	0.116
	Days > 0.09 ppm (State 1-hour standard)	0	0	1
	Days > 0.075 ppm (Federal 8-hour standard)	1	1	4
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	N/A	2.0
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	0
	Maximum 8-hour Concentration (ppm)	1.9	1.9	1.3
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0773	0.0773	0.0639
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM ₁₀	Maximum 24-hour Concentration (µg/m ³)	80	80	N/A
	Days > 50 µg/m ³ (State 24-hour standard)	4	4	N/A
PM _{2.5}	Maximum 24-hour Concentration (µg/m ³)	58.7	58.7	N/A
	Days > 35 µg/m ³ (Federal 24-hour standard)	4	4	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed June 2016. N/A: Not available at this monitoring station.				

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard Report on Cancer Prevention*, estimated

that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Thresholds of Significance

For the purposes of this analysis, air quality impacts of the Project would be considered significant if they exceed the following Standards of Significance, which are based on Appendix G of the *2013 State CEQA Guidelines*. According to these guidelines, a project would normally have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people.

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook*, *Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

Existing Emissions

The Project Site includes an existing medical office building and surface parking. As shown in Table 3.3-3, the majority of emissions are generated from mobile sources (2,052 average daily vehicle trips) that access the commercial uses at the Project Site.

Table 3.3-3
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds Per day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	12	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	7	19	80	<1	12	3
Total Operations	20	19	80	<1	12	3
<i>Source: DKA Planning 2016 based on CalEEMod 2013.2.2 model runs.</i>						

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. ARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The neighborhood is generally residential in nature, with several existing sensitive receptors near the Project Site, including:

- Multi-family residences at 681 South Bonnie Brae Street; directly south of the Project Site.
- Medical offices at 2000 West Wilshire Boulevard; 60 feet east of the Project Site.
- Multi-family residences at 1905 West Wilshire Boulevard; 60 feet north of the Project Site.
- Mid-Wilshire Convalescent Hospital at 676 South Bonnie Brae Street; 60 feet southeast of the Project Site.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan

The proposed residential land use will neither conflict with the SCAQMD's 2012 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2012 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The 2016 RTP/SCS, adopted in April 2016, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the Westlake Community Plan area that implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's growth capacity, which accommodated a projected population of 121,987 and housing base of 66,780 units by 2010.¹⁶ No further projections beyond 2010 have been prepared by the City.

As shown in Table 3.3-4, the Project would develop approximately 478 residential units, 220 hotel rooms, an approximately 69,979 square-foot new cultural and performing arts center, including an 850-seat theater and a classroom/dance studio space capable of accommodating up to 50 students. The Project could add approximately 1,343¹⁷ residents to the Plan area, based on the City's projected household density. This would marginally increase population in the South Coast Air Basin. This is a conservative projection because the Project residents may not be new to the South Coast Air Basin or the City as they may be relocating from other parts of the South Coast Air Basin or the City. While the Project Site is classified as "Regional Center Commercial" and "Community Commercial" in the Community Plan, these designations allow residential uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table 3.3-4
Project Consistency With Air Quality Management Plan's Growth Forecast

Forecast Year	City Population	Project	City Households	Project
2020	4,017,000	1,343	1,441,400	478
2040	4,609,400		1,1,690,300	

¹⁶ Westlake Community Plan, <http://cityplanning.lacity.org/complan/pdf/wlkcptxt.pdf>. 1997.

¹⁷ The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf>.

Source: DKA Planning 2016 based on SCAG 2016 Regional Transportation Plan Growth Forecast.
<http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf>
 Assumes 2.81 persons per household per 2010 Census. Employment forecast based on SCAG “Employment Density Study”, October 31, 2001.

City of Los Angeles General Plan Air Quality Element

The City’s General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City’s clean air goals. As illustrated in Table 3.3-5, the Project is consistent with the applicable policies in the General Plan. As such, the Project’s impact on the City’s General Plan would be considered less than significant.

The air quality impacts of residential development on the Project Site are accommodated in the region’s emissions inventory for the 2012 and 2016 RTP/SCS and 2012 AQMP. The Project will therefore not conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be less than significant. Similarly, the Project is consistent with the City’s General Plan Air Quality Element’s policies and does not conflict with its six goals and 15 objectives.

**Table 3.3-5
General Plan Air Quality Element**

Policy	Analysis
Policy 1.3.1 Minimize particulate emissions from construction sites.	Consistent. Construction activities will comply with SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM ₁₀ and PM _{2.5} .
Policy 1.3.2 Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	Consistent. There will be no unpaved roads or parking lots. All areas will be paved and developed.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and the LADOT DASH buses and the Metro Red Line Westlake station.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Where appropriate, the Project could include tenants that encourage telecommuting in the future.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. Where appropriate, the property management company could encourage future tenants to promote rideshare programs and subsidies. The project would have WiFi available for guests that would encourage telecommuting.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. Where appropriate, the Project could institute parking management practices in the future and could include incentives to employees for transit usage and ride-sharing.

**Table 3.3-5
General Plan Air Quality Element**

Policy	Analysis
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable. The Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The Project would minimize traffic impacts below significance thresholds with mitigation measures described in the Transportation/Traffic section.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be approved and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.2.2 Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	Consistent. The Project is an infill development that providing residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project includes pedestrian activity on the ground-floor with retail spaces. Bicycle parking will be provided. Vehicle parking will be on site.
Policy 4.2.4 Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to Metro Red and Purple Line Westlake/MacArthur Park Station and bus routes operating by the Metro and LADOT DASH buses.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities.

**Table 3.3-5
General Plan Air Quality Element**

Policy	Analysis
Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Consistent. The Project will comply with CalGreen requirements as required by LA Green Building Code. In addition, the Project will include several features that will help to minimize energy consumption, including access to public transportation and designated bike storage areas.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Not Applicable. This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs.
<i>Table: CAJA Environmental Services, June 2016.</i>	

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

Less Than Significant Impact with Mitigation Incorporated. A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Construction Phase

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 32 months. Table 3.3-6 summarizes the proposed construction schedule that was modeled for air quality impacts.

**Table 3.3-6
Construction Assumptions**

Phase	Schedule	Duration
Demolition	Month 1 to 3	2 months
Site Prep	Month 3	1 month
Grading and Excavation, 90,000 cy export	Month 4 to 7	3 months
Adaptive Reuse of Existing Building to Hotel	Month 8 to 32	24 months
Core/shell Construction	Month 8 to 32	24 months
Finishing and Tenant Improvements	Month 25 to 32	7 months
<i>Construction schedule, including start, end, and duration dates are estimates only. Client provided information, November 2016 Table: CAJA Environmental Services, November 2016.</i>		

As shown in Table 3.3-7, the construction of the Project will produce VOC, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. However, NO_x emissions could exceed the SCAQMD's thresholds, particularly from combustion of diesel fuel from construction equipment. In addition, VOC emissions from the application of architectural coatings to finish the construction process could exceed SCAQMD thresholds, particularly if there is overlap with the construction of the facility and adaptive reuse activities. As a result, construction of the Project could contribute substantially to an existing violation of air quality standards for regional pollutants (i.e., ozone). This impact is considered significant but mitigable.

In terms of local air quality, the Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for CO during the construction phase. However, construction activities could produce NO₂, PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during any concurrent grading and building construction phases. As a result, construction impacts on localized air quality are considered significant but mitigable.

Mitigation Measure 3-1 calls for the use of technically-feasible construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related NO₂, PM₁₀ and PM_{2.5} emissions. **Mitigation Measure 3-2** would further reduce emissions from off-site operation of haul trucks and other vehicles accessing the Project site. **Measures 3-3** and **3-4** are intended to ensure that concurrent construction and application of architectural coatings toward the end of the construction period don't exceed the SCAQMD's daily threshold of 75 lb/day of VOC emissions.

Table 3.3-7
Estimated Daily Construction Emissions - Unmitigated

Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2017	18	144	117	<1	23	14
2018	16	129	113	<1	10	8
2019	241	121	115	<1	9	7
Maximum Regional Total	241	144	117	<1	23	14
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	Yes	Yes	No	No	No	No
Maximum Localized Total	227	128	95	<1	12	9
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	Yes	No	N/A	Yes	Yes
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles County source receptor area.</i>						

There are several regulatory compliance measures that must be implemented under SCAQMD Rule 403, which governs fugitive dust emissions. The following regulatory compliance measures addresses fugitive dust emissions of PM₁₀ and PM_{2.5} that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3.3-7 conservatively does not assume the application of BACMs to control fugitive dust. The regulatory measures would also require that all coatings comply with SCAQMD Rule 1113, which governs the VOC content of coatings.

Regulatory Compliance Measures

RCM-3-1 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).

- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

RCM-3-2 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

RCM-3-3 In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RCM-3-4 In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Construction Mitigation Measures

MM-3-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by ARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and ARB or SCAQMD operating permit shall be provided.

MM-3-2 Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NO_x emissions requirements.

MM-3-3 Require the use of architectural coatings that average 50 g/L VOC content for interior applications and 75 g/L VOC content for exterior applications.

MM-3-4 Ensure a minimum of seven months for application of architectural coatings to ensure daily emissions don't exceed 75 lb/day of VOC.

Construction Phase Air Quality Impacts After Mitigation

As shown in Table 3.3-8, implementation of **Mitigation Measures 3-1 to 3-4** and regulatory compliance measures would substantially reduce on-site NO_x, PM₁₀ and PM_{2.5} emissions during the construction process, particularly during the site preparation and grading phases. As a result, construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Table 3.3-8
Estimated Daily Construction Emissions - Mitigated

Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2017	6	63	118	<1	9	6
2018	6	48	116	<1	4	2
2019	50	45	119	<1	4	2
Maximum Regional Total	50	63	119	<1	9	6
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total		32	83	<1	4	<3
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles County source receptor area.</i>						

Operational Phase

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project would add up to 1,355 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.¹⁸ Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5} emissions (Table 3.3-9). As a result, the Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Project would emit minimal emissions of NO₂, CO, PM₁₀, and PM_{2.5} from area and energy sources on-site. As shown in Table 3.3-9, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality are considered less than significant.

The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

¹⁸ *Traffic Study*, Gibson Transportation Consulting, July 2016.

Table 3.3-9
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	25	<1	40	<1	<1	<1
Energy Sources	<1	2	1	<1	<1	<1
Mobile Sources	16	48	197	1	42	12
Regional Totals	41	50	237	1	43	12
Existing Operations	-20	-19	-80	<1	-12	-3
Net Regional Total	21	31	157	1	31	9
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	4	2	41	<1	<1	<1
Localized Significance Threshold	-	74	680	-	2	1
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning 2016 based on CalEEMod 2013.2.2 model runs. Data in Appendix B to this IS/MND. Numbers may not add up due to rounding.						

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

Less Than Significant Impact with Mitigation Incorporated. Construction of the Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants (see Table 3.3-8). For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. As such, the Project's impact on cumulative ozone precursor emissions would be considered less than significant. Similarly, regional emissions of PM₁₀ and PM_{2.5} would not exceed mass thresholds established by the SCAQMD (see Table 3.3-8); therefore, construction emissions impacts would be considered less than significant.

Construction

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

are two proposed developments nearby the Project Site that were identified by the Project's traffic study.¹⁹

- No. 24 – 619 S. Westlake Avenue, 52 apartment units, approximately 350 feet north.
- No. 71 – 1728 W. 7th Street, 9,600 sf restaurant and 3,500 sf bar, approximately 650 feet south.

If any other of these proposed projects were to undertake construction concurrently with the Project, localized CO, PM_{2.5}, PM₁₀, and NO₂ concentrations would not exceed ambient air quality standards at nearby receptors for the following reasons. The application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM_{2.5}, PM₁₀, and NO₂. Any projects that would exceed LST thresholds would perform dispersion modeling to confirm whether health-based air quality standards would be violated and mitigate any significant localized emissions accordingly. Receptors that are located further away would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM₁₀ that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

Construction of the Project would produce cumulative considerable emissions of localized nonattainment pollutants PM₁₀ and PM_{2.5} (see Table 3.3-7), as the anticipated emissions would exceed LST thresholds set by the SCAQMD. This is considered a significant but mitigatable impact.

Mitigation Measure 3-1 calls for the use of technically-feasible construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related NO₂, PM₁₀ and PM_{2.5} emissions. Mitigation Measure 3-2 would further reduce emissions from off-site operation of haul trucks and other vehicles accessing the Project site. Mitigation Measures 3-3 and 3-4 are intended to ensure that concurrent construction and application of architectural coatings toward the end of the construction period don't exceed the SCAQMD's daily threshold of 75 lb/day of VOC emissions.

In addition, the SCAQMD would regulate fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. This is captured in Regulatory Compliance Measures. These measures could be applied to other related projects as needed to substantially reduce any significant impacts.

Operation

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level (see Table 3.3-9). Because the

¹⁹ *Traffic Study*, Gibson Transportation Consulting, July 2016.

Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table 3.3-9, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a residential and commercial project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM₁₀ and PM_{2.5} would be minimal. Similarly, existing land uses in the area include residential and commercial land uses that do not produce substantial emissions of localized nonattainment pollutants. Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant. Impacts would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. Construction of the Project could produce air emissions that impact several existing sensitive receptors near the Project Site. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. ARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. There are several existing or reasonably foreseeable sensitive receptors near the Project Site, including:

- 681 South Bonnie Brae Street is a residential development adjacent to the south of the Project Site.
- 2000 West Wilshire Boulevard is a medical office building, approximately 60 feet east of the Project Site, across Westlake Avenue.
- 1905 West Wilshire Boulevard is a residential apartment building, approximately 90 feet north of the Project Site, across Wilshire Boulevard.
- 2000 West Wilshire Boulevard is a medical office building, approximately 60 feet west of the Project Site, across Westlake Avenue.
- 676 South Bonnie Brae Street is the Mid-Wilshire Convalescent Hospital, approximately 60 feet southeast of the Project Site, across Bonnie Brae Street.

Construction

As illustrated in Table 3.3-7, these nearby receptors could be exposed to substantial concentrations of localized pollutants PM₁₀ and PM_{2.5} from construction of the Project. Specifically, construction activities would exceed SCAQMD LST thresholds for PM₁₀ and PM_{2.5} and represent a significant but mitigatable impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Mitigation Measure 3-1 calls for the use of technically-feasible construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related NO₂, PM₁₀ and PM_{2.5} emissions. Mitigation Measure 3-2 would further reduce emissions from off-site operation of haul trucks and other vehicles accessing the Project site. In addition, the SCAQMD would regulate fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. This is captured in Regulatory Compliance Measures. These measures could be applied to other related projects as needed to substantially reduce any significant impacts.

Operation

The Project would generate long-term emissions from mobile sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at sensitive receptors and would be considered less than significant. Long-term operations of the Project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area because the Project Area's climate does not experience extremely cold conditions (what about unusual atmospheric conditions, give examples). Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO nonattainment areas focus on emissions from traffic intersections where air quality may get worse.²⁰ Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the study intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2020 horizon scenarios.²¹ In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode (due to the weather) or substantially worsen traffic flow.

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by ARB based on chronic exposure to these emissions.²² However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term Project

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

²¹ *Traffic Study*, Gibson Transportation Consulting, July 2016.

²² California Office of Environmental Health Hazard Assessment. *Health Effects of Diesel Exhaust*. http://oehha.ca.gov/public_info/facts/dieselfacts.html.

operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.²³ The Project's operation would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant. Long-term operation of the Project would not have any significant impacts on pollutant concentrations at nearby receptors. Impacts would be less than significant.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project will introduce additional commercial and residential uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses such as SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations). As a result, any odor impacts from the Project would be less than significant.

²³ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

4. BIOLOGICAL RESOURCES

The section is based in part on the following item, included as Appendix D of this MND:

D Existing Tree Survey, JMD Landscape Architecture, June 2016.

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

Less Than Significant Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife²⁴ (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a building and surface parking lot. There are no City or County significant ecological areas on the Project Site.²⁵ The Project will result in the removal of vegetation around the Project Site and excavation of the ground for subterranean parking. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Compliance with the regulations of the CDFW²⁶ and USFWS²⁷ would ensure impacts are less than significant.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.²⁸ Therefore, the Project will not result in the direct removal, filling, or

²⁴ *Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: <http://www.dfg.ca.gov/about/namechange.html>.*

²⁵ *Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>.*

²⁶ *http://www.leginfo.ca.gov/html/fgc_table_of_contents.html*

²⁷ *<https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php>*

²⁸ *U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, June 16, 2016.*

hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. Therefore, no impact to riparian habitat or sensitive natural community will occur.

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

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. The Project Site is located in an urbanized area of the City. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is at MacArthur Park Lake classified as Freshwater Pond and located approximately 700 feet from the Project Site.²⁹ No impact to federally protected wetlands will occur.

- d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No Impact. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

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

Less Than Significant Impact with Mitigation Incorporated. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance, which protects certain trees (including Valley Oak and California Live Oak, Southern California Black Walnut, Western Sycamore, and California Bay).³⁰ Landscaping and trees exist along the periphery of the Project Site, in the courtyard area behind the existing building, and on the roof. The Project Site has 95 existing trees, including 17 street trees and 78

²⁹ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Layer*: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed April 11, 2016.

³⁰ City of Los Angeles, *Ordinance No. 177404*: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

onsite trees. The Project would remove 79 trees (one street tree and 78 onsite trees) and replace them per the City's Tree Replacement Program. The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Project Site and in the right-of-way. The potential impacts will be mitigated to a less than significant level with **Mitigation Measure 4-1**.

Mitigation Measure

MM-4-1 Tree Removal

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

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

No Impact. A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site. There are no City or county significant ecological areas.³¹ The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

³¹ Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>.

5. CULTURAL RESOURCES

The section is based in part on the following items, included as Appendix E of this MND:

E-1 Historic Resources Technical Report, Historic Resources Group, June 2016.

E-2 Paleontology response, Natural History Museum, May 26, 2016.

E-3 Tribal Consultation List, Native American Heritage Commission, May 17, 2016.

a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?**

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

Existing Setting

Resources located both within and immediately outside the Project Site are examined in the following analysis for the purposes of identifying potential historical resources. The context of their previous evaluations, criteria for significance and integrity issues are explored.

Wilshire Medical Building

The Project Site contains an existing medical office building known as the Wilshire Medical Building and as the Crocker Bank Building located at 1930 Wilshire Boulevard. Completed in 1928 and designed by father and son architects John and Donald B Parkinson, the fourteen-story building, originally known as the Wilshire Medical Building, was built by the Los Angeles County Medical Holding Corporation. This building is designated with a status code of 2S2, which is defined as an "Individual property determined eligible for the National Register by a consensus through Section 106 process. Listed in the California Register." The building was found to meet National Register Criteria A, associated with an event, and C, work of a master architect. It was first evaluated in 1977 and given a status code 2S, defined as an "Individual property determined eligible for the National Register by the Keeper. Listed in the California Register." In 1996, the building was included, but not reevaluated, in a survey of the Westlake/Pico Union Recovery Study Area prepared for the Community Redevelopment Agency as part of an Environmental Impact Report. The building retained its 2S2 status code. More recently, the building was included in the

2009 Westlake Recovery Redevelopment Project Area Intensive Survey. It was not reevaluated, but was updated and found to retain integrity. It again retained its 2S status code.

Individual properties located outside the Project Site are analyzed here for the purpose of identifying potential historic resources. Properties that were previously evaluated as a historic resource, that meet the fifty-year age threshold, or that exhibit characteristics or associations known to be significant are included below. The context of their previous evaluations, criteria for significance and integrity issues are explored.

Primary character-defining spaces and features are listed below:

Wilshire Medical Building Exterior

- Thirteen-story reinforced concrete tower with rectangular plan and regular massing
- Flat roof with concrete elevator penthouse
- Symmetrical composition of north and west primary façades and horizontal division into three parts
- Pressed brick cladding with terra cotta details including rusticated base, quoins, string and sill courses, molded architraves, and cornice
- Black marble base
- Regular window fenestration in upper floors on all facades
- Arched storefront windows with decorative metal cross bar
- Main arched entrance on Wilshire Boulevard with glazed metal-framed bronze doors, fanlight and transom windows with decorative metal grilles, terra cotta caduceus above arched opening, and two flanking decorative metal lanterns on terra cotta brackets
- Rear entrance with glazed bronze double doors, metal sash divided light transom with decorative metal cross bar

Wilshire Medical Building Interior

- Main ground floor lobby accessed from Wilshire Boulevard and from surface parking to rear of building
- Lobby spaces with marble floors and base, marble veneer walls, plaster walls, plaster coffered ceiling
- Bronze-framed building directory in lobby
- Bronze U.S Mail letter box and chute in lobby

- Main ground floor elevator lobby with four elevator bays with original decorative incised bronze doors
- Fire hose cabinet with wood and glazed paneled door
- Stairwell with stairs comprised of marble treads, metal risers and metal balustrades with wood handrails
- Double-loaded corridors and elevator lobbies on upper floors with marble floors and base and marble wainscot; four eight-paneled metal elevator doors with metal molded frames
- Men's and women's restrooms throughout with hexagonal floor tiles, ceramic tile wainscot, marble partitions with wood doors
- Wood paneled doors on utility closets and access panels; fire hose cabinets with wood and glazed paneled doors

2001 Wilshire Boulevard

The Westlake Professional Building has been found eligible for listing in the National Register in previous surveys including the 2009 Westlake CRA survey. In 1984 it was determined to be a contributor to a National Register eligible historic district by Part I Tax Certification and listed in the California Register. Because the building has been found eligible for the National Register and is listed in the California Register, it is a historical resource under CEQA. This nine-story reinforced concrete commercial property constructed in 1923 is located north of Wilshire Boulevard and just northwest of the Project Site. The building is Commercial Vernacular in style with a moderate amount of decorative detail, large expanse of windows, a rectangular plan and a flat roof. It was one of the first large-scale buildings to cater to the medical profession in the area after the expansion of St. Vincent's Hospital and the Good Samaritan Hospital in the early 1920s. The Westlake Professional Building maintains a high level of architectural integrity and retains significant exterior character-defining features.

666 S. Bonnie Brae Street

This building has been found eligible for listing in the National Register in previous surveys including the 2009 Westlake CRA survey. Because the building has been found eligible for the National Register, it is a historical resource under CEQA. This three-story Craftsman style multifamily residential property constructed in 1910 is located on the east side of Bonnie Brae and a half block east and three parcels south of the Project Site. The property is representative of the development of Westlake as a streetcar suburb during the early twentieth century. Westlake underwent a profound transition, from quiet parkside neighborhoods sparsely settled with elegant single-family residences to a densely settled urban area dominated by apartments, bungalow courts, and apartment hotels during the first two decades of the 20th century. This transition to multi-family properties in Westlake reflects the increased need for affordable housing near streetcar lines to accommodate a growing population. The building at 666 S. Bonnie Brea

Street is a rare example of a small multifamily residential building in Westlake that filled the need for housing near streetcar lines.

635 S. Westlake Avenue

This building has been found eligible for listing in the National Register in previous surveys including the 2009 Westlake CRA survey. Because the building has been found eligible for the National Register, it is considered a historical resource under CEQA. This two-story commercial property constructed in 1939 is located on the west side of Westlake Avenue and two parcels north of Wilshire Boulevard from the Project Site. The building is Art Deco in style with a modest amount of surface decoration. Rectangular in plan with a flat roof and a stepped parapet, the symmetrical primary façade retains rows of steel sash divided-light casement windows that wrap the corners of the building. The property was developed as medical offices by Dr. Charles C. Coghlan, a physician who was a pioneer in allergen research. Dr. Coghlan was also the owner of Hillcrest Sanitarium in La Crescenta and had offices in the Wilshire Medical Building. The building was located in the heart of the burgeoning medical community at Wilshire Boulevard and Westlake Avenue and was part of the proliferation of medical support facilities spurred by the expansion of the major hospitals in the Westlake area.

2010 Wilshire Boulevard

The “2010 Wilshire Building” has been found eligible for listing in the California Register in previous surveys including the 2009 Westlake CRA survey. Because the building has been found eligible for the California Register, it is considered a historical resource under CEQA. Completed in 1952, this ten-story, reinforced concrete commercial property is located on the south side of Wilshire Boulevard, directly west of the Project Site across Westlake Avenue. The 2010 Wilshire Building was designed by architect Earl Heitschmidt in 1950 for Wilshire Medical Properties Inc. (owners of the Wilshire Medical Building at 1930 Wilshire Boulevard on the Project Site). 2010 Wilshire originally contained medical offices and shops with a branch of California Bank occupying the majority of the first floor. Mid-Century Modern in style, the ten-story building sits on a wide two-story base of travertine and black marble. Rectangular in plan, the cubical tower with a flat roof is unadorned concrete with rows of punched windows. There is a surface parking lot to the rear with an entry on Westlake Avenue. At the time of its completion the building was promoted as an efficient plan adapted to the needs of the medical profession. 2010 Wilshire was strategically located in relation to major traffic arteries and hospitals and was surrounded by other buildings and facilities used exclusively by the medical and dental profession. The Los Angeles County Medical Association headquarters and library, built in 1934, was located diagonally across the street. The 2010 Wilshire Building maintains a high level of architectural integrity and retains significant exterior character-defining features.

Summary of Historic Resources

The Project Site contains one individual property that is a historical resource under CEQA. Four properties near the Project Site are also considered historical resources as individual properties. These historical resources are listed in Table 3.5-1 along with their historic resource status.

**Table 3.5-1
Historic Resources**

Resource	Date Built	Address	Current Status / Notes
Property Within the Project Site			
Commercial Building (Wilshire Medical Building)	1928	1930 Wilshire Blvd.	Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR. (Status Code 2S2) 2011 CA Historic Resources Inventory
Properties Near the Project Site			
Commercial Building (Westlake Professional Building)	1923	2001 Wilshire Blvd.	Contributor to a district determined eligible for NR by Part I Tax Certification. Listed in the CR. (Status Code 2D3) 2011 CA Historic Resources Inventory
Multi-family Residential	1910	666 S. Bonnie Brae St.	Appears eligible for listing in the NR as an individual property through survey evaluation. (Status Code 3S) 2009 CRA Historic Resources Survey
Commercial Building	1939	635 S. Westlake Ave.	Appears eligible for listing in the NR as an individual property through survey evaluation. (Status Code 3S) 2009 CRA Historic Resources Survey
Commercial Building	1952	2010 Wilshire Blvd.	Appears eligible for CR as an individual property through survey evaluation. (Status Code 3CS) 2009 CRA Historic Resources Survey
<i>Historic Resources Technical Report, Historic Resources Group, June 2016</i>			

Project Impacts

Impacts from Rehabilitation of the Wilshire Medical Building

The Project would rehabilitate and adaptively reuse the Wilshire Medical Building for use as a hotel. As detailed in the Project description, the existing lobby and retail spaces on the ground floor would be rehabilitated as the lobby, bar and restaurant of the hotel. The second floor would be rehabilitated as a business center, and the remaining floors would be rehabilitated with guestrooms. Without mitigation to ensure that essential character-defining features are retained, rehabilitation of the Wilshire Medical Building has the potential to alter or remove character-defining features that are important in conveying the historic significance of the building.

Potential Impacts from New Construction to the Wilshire Medical Center

The Project proposes substantial new construction to be located immediately adjacent to the Wilshire Medical Building. The new construction will be built on land that is currently occupied by surface parking. The existing parking lot is not considered a character-defining feature of the Wilshire Medical Center and is not critical to understanding the building's original use, architecture and configuration. The Project includes a new cultural and performing arts center to be constructed immediately east of the

Wilshire Medical Building at the north east corner of the Project Site. The cultural and performing arts center building will contain five levels, rising to the height of the 9th floor of the Wilshire Medical Building. The proposed cultural and performing arts center building will be approximately two-thirds the height of the Wilshire Medical Building, and the Wilshire Medical Building will remain the dominant building when viewed from Wilshire Boulevard.

The proposed cultural and performing arts center will attach to the Wilshire Medical Building at ground level. A narrow bridge will also connect the cultural and performing arts center rooftop to the 10th floor of the Wilshire Medical Building. The ground floor connection from the cultural and performing arts center to the Wilshire Medical Building and the bridge connection from the cultural and performing arts center rooftop will be minimally invasive with minor material loss, and the new construction will not substantially alter the Wilshire Medical Building. At both locations, the cultural and performing arts center will connect to the east façade of the Wilshire Medical Building which is a secondary façade with minimal architectural articulation. The majority of the façade will remain intact and unaltered after connection to the proposed new cultural and performing arts center. A parking structure will be constructed on the southern half of the Project Site. A 41-story residential tower will rise from the southeast half of the parking structure. The parking structure and residential tower will be spatially separate and distinct from the Wilshire Medical Building and will not attach to it. The proposed new construction will alter the spatial relationships on the Project Site by inserting new buildings in an area currently occupied by a surface parking lot. In order for this alteration to be considered a substantial adverse change, however, it must be shown that the integrity and/or significance of the Wilshire Medical Building would be materially impaired by the proposed adjacent new construction.

In deference to the Wilshire Medical Building, the proposed new residential tower will be located at the rear and to the east of the Project Site where it will not interfere with or detract from viewing and fully experiencing the Wilshire Medical Building's primary northern and western facades. The Wilshire Medical Building was designed with an orientation towards Wilshire Boulevard and it is from Wilshire Boulevard, or from Westlake Avenue where the building's original massing, configuration and its important architectural features are best perceived and experienced. In contrast, the east and south-facing facades are treated in a much simpler and straightforward manner, largely devoid of articulation and detailing. The east- and south-facing facades are clearly secondary, and were designed in anticipation of possible new construction on the adjacent parcels. Even so, the majority of the Wilshire Medical Building's secondary eastern and southern facades will also remain largely visible from most vantage points due to the siting of the apartment tower to the southern and eastern portions of the Project Site.

The Project will not involve any relocation or demolition of the Wilshire Medical Building and only minor alteration of its east-facing façade. Therefore, the Project will not affect integrity of location, design, materials, workmanship, feeling or association. All the existing physical elements will continue to convey the historic significance of the property after implementation of the Project. The Project will insert substantial new construction on what is currently surface parking which will affect integrity of setting. Despite this alteration, the Wilshire Medical Building will continue to convey its historic significance after Project construction and will not be materially impaired. The general configuration and orientation of the building will remain discernible after construction and the primary north- and west-

facing facades will remain intact and unobstructed. For these reasons, the significance and integrity of the Wilshire Medical Building will remain intact and the building will retain its eligibility for listing in the National Register of Historic Places and the California Register of Historical Resources.

Potential Impacts to Historic Resources Adjacent to the Project Site

The Project will construct substantial new buildings on a site currently occupied by surface parking. The addition of this new construction will alter the surroundings of adjacent and nearby historic resources. Any alteration of the surroundings of nearby historical resources that adversely affect the integrity of those historical resources can potentially constitute a substantial adverse change in that resource. An analysis of the alteration to the immediate surroundings of each of the potentially affected historical resources using the seven aspects of historic integrity is provided below.

2001 Wilshire Boulevard

The Westlake Professional Building at 2001 Wilshire Boulevard has been found eligible for listing in the National Register and listed in the CR through survey evaluation and is considered a historical resource for the purposes of CEQA. The Westlake Professional Building is located northwest of the Project Site across Wilshire Boulevard and the Project will not physically impact the building in any way. The immediate surroundings of the Westlake Professional Building will not be significantly altered by the Project given the distance between the two properties. The Project will not affect the integrity of location, design, materials, workmanship, feeling, association, or setting of the Westlake Professional Building. After Project construction, the Westlake Professional Building will remain unchanged and the building will continue to convey its historic significance. Therefore, the Project will not adversely affect the Westlake Professional Building in a manner that would materially impair its significance as a historical resource.

666 S. Bonnie Brae Street

666 S. Bonnie Brae Street has been previously found eligible for listing in the National Register through survey evaluation and is considered a historical resource for the purposes of CEQA. The three-story Craftsman residential building at 666 S. Bonnie Brae Street is located east of the Project Site across S. Bonnie Brae Street. New construction associated with the Project will be substantially larger than the three-story Craftsman building. Because the Project will add substantial mass and height to an area currently occupied by surface parking, the Project will change the physical environment of the three-story Craftsman building at 666 Bonnie Brae Street. The Project will not involve any relocation, demolition or alteration of this adjacent property; therefore, it will not affect integrity of location, design, materials, workmanship, feeling or association. All the existing physical elements will continue to convey the historic significance of the property after implementation of the Project. The only aspect of integrity that is potentially relevant here is setting. The surroundings of 666 S. Bonnie Brae Street have been substantially altered since its original construction through successive demolitions and new construction. Therefore, integrity of setting is not critical to conveying its historic significance and all of the other aspects of integrity will remain. After Project construction, the Craftsman building at 666 S. Bonnie Brae Street will remain unchanged and the building will continue to convey its historic significance. Therefore,

the Project will not adversely affect the building located at 666 S. Bonnie Brae Street in a manner that would materially impair its significance as a historical resource.

635 S. Westlake Avenue

This two-story commercial building has been previously found eligible for listing in the National Register through survey evaluation and is a historical resource under CEQA. The property is located in the west side of Westlake Avenue and two parcels north of Wilshire Boulevard from the Project Site and the Project will not physically impact the building in any way. The immediate surroundings of the property will not be significantly altered by the proposed Project given the distance between the two properties. The Project will not affect the integrity of location, design, materials, workmanship, feeling, association, or setting of 635 S. Westlake Avenue. After Project construction, the two-story commercial building at 635 S. Westlake Avenue will remain unchanged and the building will continue to convey its historic significance. Therefore, the Project will not adversely affect the building located at 635 S. Westlake Avenue in a manner that would materially impair its significance as a historical resource.

2010 Wilshire Boulevard

The ten-story commercial building at 2010 Wilshire Boulevard has been previously found eligible for listing in the California Register through survey evaluation and is a historical resource for the purposes of CEQA. The property is located on the south side of Wilshire Boulevard, directly west of the Project Site across Westlake Avenue, and the Project will not physically impact the building in any way. The immediate surroundings of the 2010 Wilshire Boulevard building will not be significantly altered by the Project as the majority of the mass and height of the proposed new construction will be located on the eastern portion of the Project Site substantially east of 2010 Wilshire Boulevard. The Project will not affect the integrity of location, design, materials, workmanship, feeling, association, or setting of the 2010 Wilshire Boulevard building. After Project construction, the 2010 Wilshire Boulevard building will remain unchanged, and the building will continue to convey its historic significance. Therefore, the Project will not adversely affect the building located at 2010 Wilshire Boulevard in a manner that would materially impair its significance as a historical resource.

Conclusion

The analysis of the potential impacts to historical resources has concluded that the Project rehabilitation of the Wilshire Medical Building has the potential to result in a significant impact if not mitigated to ensure that the rehabilitation will be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. The Project will add new construction on land that was previously used for surface parking. This addition, however, will not result in substantial adverse changes that reduce the integrity or significance of historic resources either adjacent to or in the near vicinity of the Project Site. **Mitigation Measure 5-1** and **5-2** would protect historic resources from potential impacts associated with the Project. Impacts would be reduced to less than significant.

Mitigation Measure

MM-5-1 Historic Resources

1. The applicant shall engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to oversee the design development and construction for compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant shall conduct on-site construction monitoring throughout the construction phase.
2. The Project shall include a shoring plan to ensure the protection of the Wilshire Medical Building at 1930 Wilshire Boulevard during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

MM-5-2 The Project shall include an onsite interpretive display commemorating the history of the Wilshire Medical Building at 1930 Wilshire and its historic significance. This display may include historic photos, drawings and text.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and a parking lot. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading. The Project will comply with the following regulatory compliance measure, and impacts will be less than significant.

Regulatory Compliance Measure

RCM-5-1 Archaeological

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

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

Less Than Significant Impact. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains existing buildings and surface parking. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading. However, there is still the potential for buried paleontological resources to be found within the Project Site. The Natural History Museum states the following:³²

We do not have any vertebrate fossil localities that lie within the proposed project area boundaries, but we do have localities nearby from the same sedimentary deposits that occur in the proposed project area, either at the surface or at depth...

Very shallow excavations of only a few feet in the older Quaternary Alluvium exposed throughout the proposed project area may not encounter any significant fossil vertebrate remains. Deeper excavations that extend down into older sedimentary deposits including possibly the Fernando Formation and the Puente Formation, however, may very well uncover significant vertebrate fossils. Any substantial excavations in the proposed project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples from the finer-grained deposits should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

The Project will comply with the following regulatory compliance measure, and impacts will therefore be less than significant.

Regulatory Compliance Measure

RCM-5-2 Paleontological

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local

³² Natural History Museum, May 26, 2016. Response included in the appendices.

guidelines, including those set forth in California Public Resources Code Section 21083.2.

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

Less Than Significant Impact. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains existing buildings and surface parking. The Project would require excavation for two subterranean parking levels, utility and foundation work, and grading. Public Resources Code Sections 21080.3.1 and 21080.3.2 require public agencies to consult with California Native American Tribes identified by the Native American Heritage Commission (NAHC) for the purpose of mitigating impacts to tribal cultural resources. The Project would comply with this requirement. The NAHC was contacted and a consultation tribal list was received on May 17, 2016 (included as an Appendix to this MND). Environmental impacts may result from Project implementation due to discovery of unrecorded human remains. However, the Project will comply with the following regulatory compliance measure, and impacts will thus be less than significant.

Regulatory Compliance Measure

RCM-5-3 Human Remains

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

- Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American.

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

6. GEOLOGY AND SOILS

The section is based in part on the following items, included as Appendix F of this MND:

F-1 Geotechnical Investigation, GeoKinetics, July 29, 2016.

F-2 LADBS Correction Letter, September 21, 2016.

F-3 Response to LADBS Correction Letter, GeoKinetics, November 29, 2016.

F-4 LADBS Approval Letter, December 23, 2016.

- a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
- (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles.

California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered “inactive” or “potentially active.” Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered “active faults.” Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture. No known active faults cross the Project Site, and the Project Site is not located within an Alquist-Priolo Fault Rupture Study Area.³³ The Project Site is not crossed by any known faults, with the closest mapped fault (Hollywood Fault) located approximately 5.8 km (3.6 miles) to the north.³⁴ Therefore, there is no potential for surface fault rupture at the Project Site, and impacts would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The principal seismic hazard to the Project Site and proposed project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and

³³ ZIMAS search: <http://zimas.lacity.org/>.

³⁴ Geotechnical Investigation, GeoKinetics, July 29, 2016.

reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

Seismic Hazard Zones

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various “seismic hazards zones.” The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act requires a site investigation by a certified engineering geologist and/or civil engineer with expertise in geotechnical engineering, for projects sited within a hazard zone. The investigation is to include recommendations for a “minimum level of mitigation” that should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

Seismic Hazard Zone delineations are based on a combination of factors, including the following: surface distribution of soil deposits; physical relief; depth to historic high groundwater; shear strength of the soils; and occurrence of past seismic deformation. The Project Site is located within the United States Geologic Survey, Hollywood Quadrangle. The nearest fault is the Puente Hills Fault, approximately 0.68 kilometers away.³⁵ The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

Although not crossed by any active fault, the Project Site is underlain by the Los Angeles segment of the deeply buried Puente Hills Blind Thrust Fault system, with a modeled depth of approximately 5 to 6 km below the ground surface. This fault system does not have a surface expression, but it is considered seismically active and is in part a contributor to regional tectonic uplift as indicated by the presence of the Elysian Park Hills.³⁶ The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts related to seismic ground shaking will be less than significant.

³⁵ ZIMAS search: <http://zimas.lacity.org/>.

³⁶ *Geotechnical Investigation*, GeoKinetics, July 2016.

(iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a process that occurs when saturated sediments are subjected to repeated strain reversals during an earthquake. The strain reversals cause increased pore water pressure such that the internal pore pressure approaches the overburden pressure and the shear strength approaches zero. Liquefied soils may be subject to flow or excessive strain, which can cause settlement. Liquefaction occurs in soils below the groundwater table. Soils commonly subject to liquefaction include loose to medium dense sand and silty sand. Predominantly fine-grained soils, such as silts and clay, are less susceptible to liquefaction. Generally, plastic soils with a clay content of greater than 15 percent, a Plasticity Index greater than 18, and/or a fines content (percent passing the 200 sieve) greater than 30 to 50 percent, are not considered subject to liquefaction.

According to the City of Los Angeles ZIMAS mapping system the Project Site is not classified within an area susceptible to liquefaction.³⁷ According to the General Plan Safety Element, the Project Site is not within a liquefaction area.³⁸ In addition, based upon GeoKinetics review of published mapping by the California Division of Mines and Geology (CDMG, 1998), former name of the California Geological Survey (CGS), for the Hollywood 7.5-minute quadrangle, the Project Site is not located within mapped zones for liquefaction. Shallow groundwater conditions do not exist below the Project area, and the Project Site is underlain by firm bedrock. There is no potential for ground deformation at the site associated with liquefaction.³⁹ Therefore, no impact will occur. The Project will comply with the following regulatory compliance measure.

Regulatory Compliance Measure

RCM-6-1 Liquefaction Area

The Project shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5 Liquefaction Potential and Soil Strength Loss.

RCM-6-2 Geotechnical Conditions

The Project shall comply with the recommendations and conditions contained within the Geotechnical Report for the Project, and as it may be subsequently amended or modified.

The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

³⁷ ZIMAS search: <http://zimas.lacity.org/>.

³⁸ Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed April 11, 2016.

³⁹ *Geotechnical Investigation*, GeoKinetics, July 29, 2016.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.⁴⁰ The General Plan Safety Element does not identify any around the Project Site as a bedrock or probable bedrock landslide area.⁴¹ Therefore, no impacts with respect to landslides will occur.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing buildings) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur.

The Project includes two subterranean levels at an approximate depth of 35 feet below grade. Grading and excavation will also include a depth required foundation footings and soil compaction. All grading activities require permits from the City of Los Angeles Department of Building and Safety, which reviews compliance with requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation will comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of Building and Safety's Grading Division.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of the required construction BMPs detailed in the required SWPPP, soil erosion during construction impacts will be less than significant. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure and existing building; thus, no

⁴⁰ ZIMAS search: <http://zimas.lacity.org/>.

⁴¹ Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed April 11, 2016.

exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

Mitigation Measure

MM-6-1 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- The Project shall prepare a Grading Plan that shall conform with the City of Los Angeles Department of Building and Safety Grading Division's Landform Grading Manual Guidelines.
- Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 shall be provided to the satisfaction of the Los Angeles Department of Building and Safety.

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

Less Than Significant Impact. A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. As discussed in the response to Questions 6(a)(iii), 6(a)(iv), the Project Site is not at risk for landslides and would contain regulatory compliance measures for its liquefaction potential.

Construction of the proposed improvements is feasible from a geotechnical standpoint, provided that GeoKinetics recommendations are incorporated into the design plans and specifications, and implemented during construction.⁴² The recommendations are incorporated by reference as a regulatory compliance measure (requiring compliance with the recommendations and conditions in the Geotechnical Report and LADBS Approval Letter), above. Therefore, impacts will be less than significant.

⁴² *Geotechnical Investigation, GeoKinetics, July 29, 2016.*

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils contain significant amounts of clay which may expand or shrink with moisture variations. The recommendation for shoring and excavation is included as a regulatory compliance measure (requiring compliance with the recommendations and conditions in the Geotechnical Report and LADBS Approval Letter), above. Therefore, impacts associated with expansive soils will be less than significant.

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

No Impact. This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

7. GREENHOUSE GAS EMISSIONS

The section is based in part on the following item, included as Appendix C of this IS/MND:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, August 2016.

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

Less Than Significant Impact. The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single project's impact will be negligible. .

Climate change analyses are also unique because emitting CO₂ into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO₂ in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO₂ into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Pollutant and Effects

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is retained, warming the atmosphere. This phenomenon is known as the greenhouse effect. GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO₂) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO₂ emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO₂ comprises over 80 percent of GHG emissions in California.⁴³
- Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater

⁴³ California Environmental Protection Agency, *First Update to the Climate Change Scoping Plan*, May 2014.

treatment. Methane makes up 8.3 percent of all GHGs, and mobile sources and general fuel combustion represent 0.69 percent of overall methane emissions.⁴⁴

- Nitrous Oxide (N₂O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 12 percent of N₂O emissions.⁴⁵ N₂O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF₆) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF₆ are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.⁴⁶ As shown in Table 3.7-1, the other GHGs are less abundant but have higher GWP than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. High GWP gases such as HFCs, PFCs, and SF₆ are the most heat-absorbent.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to

⁴⁴ California Environmental Protection Agency, *First Update to the Climate Change Scoping Plan*, May 2014.

⁴⁵ United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N₂O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001.

⁴⁶ California Air Resources Board, *Climate Change Emission Control Regulations*, 2004.

35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

Table 3.7-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	25
Nitrous Oxide (N ₂ O)	298
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbons (HFCs)	124-14,800
Sulfur Hexafluoride (SF ₆)	22,800
<i>Source: Southern California Association of Governments, Draft Program EIR for 2016 RTP/SCS. November 24, 2015.</i> <i>Global warming potential measures how much heat a GHG traps in the atmosphere, such as over a 100-year period.</i>	

Regulatory Setting

International

Kyoto Protocol. In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt. The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have

estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020 and acknowledges that \$100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed on April 22, 2016 and ratified by 177 countries.

The Western Regional Climate Action Initiative (WCI). The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The U.S. Environmental Protection Agency has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.⁴⁷ In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the

⁴⁷ *Massachusetts v. Environmental Protection Agency et al* (127 S. Ct. 1438 [2007]).

National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon. In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding \$8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

Vehicle Standards

Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (NHTSA) joint rulemaking for vehicle standards.

Energy Independence and Security Act (EISA)

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”

State

Assembly Bill 1493. California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by vehicles used for personal transportation.

Executive Order S-3-05. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below

1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team (“CAT”) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.⁴⁸ Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.⁴⁹ According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15. On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State’s GHG targets with those set in October 2014 by the European Union and is intended to help the State meet its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs the CARB to update the Climate Change Scoping Plan. A recent study shows that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.⁵⁰

Assembly Bill 32. In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air

⁴⁸ California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006.

⁴⁹ California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 57.

⁵⁰ Greenblatt, Jeffrey, *Energy Policy*, “Modeling California Impacts on Greenhouse Gas Emissions” (Vol. 78, pp. 158-172).

conditioning maintenance, and increasing methane capture from landfills.⁵¹ On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year and make up 94 percent of the point source CO₂ emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the “2008 Scoping Plan”). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state’s dependence on oil, diversify the state’s energy sources, save energy, create new jobs, and enhance public health. It accommodated the State’s projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

An important component of the plan is a cap-and-trade program covering 85 percent of the state’s emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California’s clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 “business-as-usual” (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).⁵² ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic

⁵¹ California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

⁵² California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED)*, Attachment D, August 19, 2011.

recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.⁵³ Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent) to achieve 1990 levels.

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan (First Update), recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons (MMT) MMTCO₂e 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 MMTCO₂e. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the First Update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 MMTCO₂e or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.^{54,55}

As shown in Table 3.7-2, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Table 3.7-2
Emission Reductions Needed To Meet AB 32 Objectives In 2020

Sector	Million Metric Tons of CO ₂ e Reduction	Percent of Statewide CO ₂ e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions

⁵³ California Air Resources Board, *Greenhouse Gas Inventory – 2020 Emissions Forecast*, <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>. Accessed June 2014.

⁵⁴ CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].

⁵⁵ CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014.

			from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	-78	-15.3%	
<i>Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.</i>			

Cap and Trade. ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program’s duration. Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO₂e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO₂e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California’s direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California’s direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by ARB in AB 32, the reductions attributed to

the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,⁵⁶ the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.⁵⁷ However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."⁵⁸ The "expected completion date" for this recommended action is 2017.⁵⁹ It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

Senate Bill 1368. Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines. In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;

⁵⁶ *California Health & Safety Code § 38551(a)* ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.").

⁵⁷ *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

⁵⁸ *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

⁵⁹ *Id.*

- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375. On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations ("MPOs") to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.⁶⁰

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO₂e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.⁶¹ There is currently no timetable for finalized thresholds. On September 23, 2010, ARB adopted regional targets for the reduction of GHG

⁶⁰ American Planning Association, California Chapter, Analysis of SB 375, <http://www.calapa.org/en/cms/?2841>.

⁶¹ California Air Resources Board.
<http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>.

emissions applying to the years 2020 and 2035.⁶² For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.⁶³

Title 24 Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (CCR), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds. The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO₂ equivalent

⁶² California Air Resources Board. *Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*. <http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf>.

⁶³ CARB. 2011. *Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375*.

(MTCO₂e) as a screening numerical threshold for stationary sources. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 MTCO₂e for residential projects, 1,400 MTCO₂e for commercial projects, and 3,000 MTCO₂e for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 MTCO₂e per service population as a 2020 target and 3.0 MTCO₂e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO₂e and the plan-level target for 2035 was 4.1 MTCO₂e. The SCAQMD has not established a timeline for formal consideration of these thresholds.⁶⁴ In the meantime, the project level thresholds are used as a non-binding guide. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the “RTP/SCS”) update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State’s goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of mitigation measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.⁶⁵ These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Local (City of Los Angeles)

Green LA Plan. In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

ClimateLA Implementation Plan. To implement the Green LA Plan, the City published “ClimateLA”, which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

⁶⁴ SCAG, *Final PEIR for the 2016-2040 RTP/SCS, Appendix G*. Accessible at http://rtpscs.scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.

⁶⁵ Southern California Association of Governments, *Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8*.

- Green Building: The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.
- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.
- Waste: Reduce or recycle 70 percent of trash by 2015.
- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to “daylight” streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan. On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City’s mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan’s call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.⁶⁶ Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.⁶⁷ The City’s ordinance affects the following types of development:⁶⁸

⁶⁶ City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).

⁶⁷ U.S. Green Building Council. “Interpretation 10396” accessed at <http://www.usgbc.org/leed-interpretations?keys=10396> February 26, 2015.

⁶⁸ Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

1. New non-residential building or structure of 50,000 gross square feet or more of floor area;
2. New mixed-use or residential building of 50,000 gross square feet or more in excess of six stories;
3. New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
4. The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
5. The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.
6. The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals)
2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Existing Emissions

The Project site includes an existing medical office building with surface parking. As shown in Table 3.7-3, the bulk of emissions come from the 2,052 average daily vehicle trips that travel to and from the Project Site.

**Table 3.7-3
Existing Annual CO₂e Greenhouse Gas Emissions**

Scenario and Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources	<1	<1	<1	<1
Energy Sources	2,245	<1	<1	2,250

Table 3.7-3
Existing Annual CO₂e Greenhouse Gas Emissions

Scenario and Source	CO₂	CH₄	N₂O	CO₂e
Mobile Sources	1,943	<1	0	1,944
Waste Sources	168	10	0	376
Water Sources	142	<1	<1	156
Total Emissions	4,497	11	<1	4,726
<i>Metric tons per year. Numbers may not add up due to rounding.</i>				
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2. Data in Appendix to this MND.</i>				

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁶⁹ The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."⁷⁰ Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements. The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

⁶⁹ California Climate Action Registry, *General Reporting Protocol Version 3.1, January 2009*, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed March 2, 2015.

⁷⁰ *Ibid.*

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).⁷¹

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

ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.⁷² For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁷³ Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD’s California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. 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.⁷⁴

⁷¹ Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

⁷² California Air Resources Board, *Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32)*, Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2016.

⁷³ OPR Technical Advisory, p. 5.

⁷⁴ See www.caleemod.com.

Significance Criteria

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a Project's impact on greenhouse gases and climate change applicable to this Project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; 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). Further, it states that:

- A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment;
- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance for GHG emissions. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA

Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program 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.⁷⁵ Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.”⁷⁶ Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.⁷⁷

Although GHG emissions can be quantified, ARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.⁷⁸ Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation

⁷⁵ See www.caleemod.com.

⁷⁶ See www.caleemod.com.

⁷⁷ See, for example, San Joaquin Valley Air Pollution Control District, *CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation, APR—2030* (June 25, 2014), in which the SJVAPCD “determined that GHG emissions increases that are covered under ARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO₂e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, *Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project*, SCH No. 2012041014 (October 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, *Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project*, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA*, SCH No. 2014101040 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and *Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project*, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

⁷⁸ The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2.

program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.⁷⁹

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- SB 375;
- SCAG's Sustainable Communities Strategy; and
- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

Project Impacts

Construction

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the 32-month duration of construction activities. As illustrated in Table 3.7-4, construction emissions of CO₂ would peak in 2017, when up to 21,711 pounds of CO₂e per day are anticipated following implementation of recommended Mitigation Measures 3-1 to 3-4 and regulatory compliance measures. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 3.7-4
Estimated Construction Emissions - Mitigated

Construction Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
2017	21,650	3	0	21,711
2018	19,435	3	0	19,493
2019	19,888	3	0	19,945
<i>Pounds per day</i>				
<i>Source: DKA Planning, 2016 based on CalEEMod 2013.2.2. Data in Appendix to this MND.</i>				

⁷⁹ 14 CCR § 15064(h)(3).

Operation

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach mirrors the concepts used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when ARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in Table 3.7-5, the emissions for the Project and its associated ARB 2020 NAT scenario are estimated to be 9,637 and 14,314 MTCO₂e per year, respectively, which shows the Project will reduce emissions by 33 percent from the ARB 2020 NAT scenario. This represents an increase of 4,911 MTCO₂e

per year. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table 3.7-5
Estimated Annual CO₂e Greenhouse Gas Emissions

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	8	8	-	0%
Energy Sources	5,454	3,163	-2,291	-42%
Mobile Sources	8,009	5,622	-2,387	-30%
Waste Sources	155	155	-	0%
Water Sources	506	506	-	0%
Construction	182	182	-	0%
Total Emissions	14,314	9,637	-4,677	-33%
Net Emissions	-	4,911	N/A	N/A

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2016.

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the proposed project's impact (i.e., 15.3 percent reduction from NAT). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

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

As illustrated in Table 3.7-6, the Project's profile as an urban infill project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would reduce about 25 percent of vehicle trips from the substantial mode share from public transit, along with reductions because of its mixed-use nature and the opportunity for pass-by trips to the theater facility. These would result in concomitant reductions in CO₂e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the proposed project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

Table 3.7-6
Daily Vehicle Travel Reductions Associated with Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Apartments	10%	-	25%
Theater	-	10%	25%
Classroom	-	-	25%
Hotel	10%	-	25%
<i>Traffic Study, Gibson Transportation Consulting, July 2016.</i>			

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by the City's Green Building code.
- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the Project contains regulatory compliance measures and project design features (utility and service system section) that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. Project-specific impacts related to the emission of greenhouse gases would be less than significant.

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

Less Than Significant Impact. The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with relevant plans and policies that govern climate change.

Consistency with Executive Orders S-03-05 and B-30-15.

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and other transit providers.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by ARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis 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 is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "...for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in ARB's First Update to the AB 32 Scoping Plan.^{80,81} As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. Table 3.7-7 evaluates the Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan. The Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the

⁸⁰ CARB, *First Update*, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].

⁸¹ CARB, *First Update*, Table 6: *Summary of Recommended Actions by Sector*, pp. 94-99, May 2014.

Project's emissions level.⁸² Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.⁸³

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.⁸⁴
- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.⁸⁵
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.⁸⁶

Table 3.7-7
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	Not Applicable. The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	Not Applicable. The development of standards is not relevant to the Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	Consistent. The Project will be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, with compliance with the City's Green Building Ordinance, the Project will exceed Title 24 standards.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	Consistent. The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy. LADWP had an average of 23% renewables as of 2013.

⁸² CARB, *First Update*, pp. 37-39, 85, May 2014.

⁸³ CARB, *First Update*, pp. 40-41, May 2014.

⁸⁴ CARB, *First Update*, pp. 55-56, May 2014.

⁸⁵ CARB, *First Update*, p. 65, May 2014.

⁸⁶ CARB, *First Update*, p. 69, May 2014.

Table 3.7-7
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	Not Applicable. The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	Not Applicable. The development of regional planning goals is not relevant to the Project.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not Applicable. State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	Neutral. This is a state-wide goal and whether the Project does or does not include solar roofs will not affect the state-wide implementation of this program.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	Not Applicable. This measure addresses industrial facilities. The Project is not an industrial facility.
High Speed Rail. Support implementation of a high speed rail system.	Not Applicable. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The Project will be compliant with the City's Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	Consistent. Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project will be compliant with the City's Green Building Ordinance and will incorporate water saving features and energy efficient fixtures into its design.

Table 3.7-7
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. The Project does not include agricultural facilities.
<i>Source: CAJA Environmental Services, 2016.</i>	

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Site's location near substantial local transit and bus services places it in a High Quality Transit Area (HQTa). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

Further, the vertical integration of land uses on the Project Site will produce substantial reductions in auto mode share to and from the Project Site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

At least 5 percent of the total code-required parking spaces will be equipped with EV charging stations. Plans will indicate the proposed type and location(s) of charging stations, and plan design will be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5 percent requirement results in a fractional space, round up to the next whole number.

Table 3.7-8 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table 3.7-8
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis ^a
<i>Land Use Strategies</i>		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	Consistent. The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	Consistent. The Project would help further jobs/housing balance objectives. The Project is also consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	Not Applicable. While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	Consistent. The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
<i>Transportation Strategies</i>		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	Consistent. The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.

**Table 3.7-8
Project Consistency With SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis ^a
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
<i>Technological Innovation and 21st Century Transportation</i>		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	Consistent. While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	Consistent. While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	Not Applicable. While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
<i>Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.</i>		

Consistency with the City of Los Angeles ClimateLA Implementation Plan

Construction of the Project would generally be consistent with “ClimateLA” implementation plan, including its goal of making Los Angeles a worldwide leader in green buildings. Specifically, compliance with the City’s LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (Present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions.

Construction of the Project is consistent with the “ClimateLA” plan’s goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City’s Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operations of the Project is also consistent with the “ClimateLA” focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project is consistent with the Plan’s focus on reducing emissions from private vehicle use. Specifically, the site’s infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the mixed-use nature of the Project is consistent with the Plan’s land use policies

that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the Project would be consistent with “ClimateLA” and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State’s renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City’s water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project is subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the “ClimateLA” plan.

With regard to waste, the Project would be consistent with the “ClimateLA” goal of reducing or recycling 70 percent of trash by 2015. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City’s Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with “ClimateLA” and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to “daylight” streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Project will comply with the City of Los Angeles' Green Building Ordinance standards, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level or equivalent. Projects that are LEED certified or the equivalent generally exceed Title 24 (2013) standards by at least 10 percent.⁸⁷ As such, the Project would incorporate several design elements and programs that will reduce its carbon footprint, including:

1. GHG Emissions Associated with Planning and Design. The Project will implement measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

- Access to several public transportation lines, the Metro, bus lines LADOT DASH lines, and Metro Red Line Westlake Station. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

2. GHG Emissions Associated with Energy Demand. The Project will meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This would include:

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
 - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
 - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
 - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
 - Installed tank type water heaters will have an Energy Factor higher than .6.
 - Installed tankless water heaters will have an Energy Factor higher than .80.

⁸⁷ U.S. Green Building Council. "Interpretation 10396" accessed at <http://www.usgbc.org/leed-interpretations?keys=10396> July 20, 2016.

- Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
- Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit will be adequately sized by the designer but shall not be less than one inch. The conduit will be labeled as per the Los Angeles Fire Department requirements. The electrical panel will be sized to accommodate the installation of a future electrical solar system.
- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location will be suitable for installing future solar panels as determined by the designer.
- Appliances will meet Energy Star designations as applicable for that appliance.

3. GHG Emissions Associated with Water Use. The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It will also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
 - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
 - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.
- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.
- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:
 - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

- Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. GHG Emissions Associated with Solid Waste Generation. The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. GHG Emissions Associated with Environmental Quality. The Project will meet the strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.
- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project is consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that

climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program. Currently, there are no quantitative ARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles policies (e.g., Green Building Ordinance, Mobility 2035 Plan, ClimateLA).

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. The Project is consistent with the approach outlined in ARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by ARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by ARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP. The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code). Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 22 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions. As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts are not cumulatively considerable. Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following items, included as Appendix G of this IS/MND:

G-1 Phase I Environmental Site Assessment, EFI Global Inc., August 15, 2016.

G-2 Site Investigation and Request for Site Closure Report, EFI Global Inc., August 18, 2016.

G-3 Soils Management Plan, EFI Global Inc., August 19, 2016.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less than significant.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of hotel, residential, cultural, and parking uses. These typical urban uses do not involve the routine use of hazardous materials. Instead, the operation of the Project has limited hazardous materials similar to any other mixed-use urban development. For example, the proposed hotel uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's commercial and office uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with the operation of the Project would be less than significant.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, potential impacts associated with the minimal transport of any hazardous materials would also be less than significant.

b) Would the project create 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 with Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Site History

According to EFI Global's interpretation of the historical research data, the Project Site was undeveloped land as early as 1894. The following describes the historical development for each corner of the Project Site.

Southwestern corner - Circa 1906, two dwellings were located on the southwestern portion of the Project Site. An auto repair structure was located near the south/central portion of the Project Site circa 1950. The southwestern corner of the subject appears to have been cleared of any structures by 1953 and has since been utilized as a parking lot.

Northwestern corner - Circa 1928, the current 13-story commercial building (1930 Wilshire Boulevard) was constructed on the Project Site. Since construction, this building has been occupied by various commercial offices, medical clinics, pharmacies, restaurants, and other commercial occupants.

Northeastern corner - Circa 1933, a medical/commercial office building (1908-1914 Wilshire Boulevard) was constructed near the north/central portion of the Project Site, which was eventually demolished sometime prior to 1989. Circa 1936 through 1956, a gasoline station (1900 Wilshire Boulevard) with at least two configurations was located on the northeastern corner of the Project Site. Circa 1962 through at

least 1976, this northeastern corner of the Project Site was occupied by various food stands and florists, and has since been utilized as a parking lot.

Southeastern corner - From at least 1910 through at least 1922, this portion of the Project Site was developed with several residential structures, which were demolished by 1935. Circa 1936, a multi-level parking garage was constructed, which was eventually demolished in 1987. Since then, this portion of the Project Site has been utilized as a parking lot.

Previous occupants of the Project Site have included a former gasoline station, former auto repair facility, and a former parking garage (with associated underground storage tanks), which are further discussed in the Environmental Data Search section below.

Environmental Data Search

The Project Site is listed on the following regulatory databases researched.

- Dr. Walter Jayasinghe (1930 Wilshire Boulevard) - The Project Site is listed on the Facility and Manifest Data (HAZNET) database. Hazardous waste generated by the property owner in 1993 and again in 2006 consisted of asbestos containing waste (disposed via landfill). This waste material is likely related to renovation activities at the Project Site and is not expected to represent a significant environmental concern.
- CME Medical Inc. (1930 Wilshire Boulevard Suite 1400) - This tenant of the Project Site is listed on the HAZNET database. Hazardous waste generated by this facility from 1994-2001 included photochemical/photoprocessing waste (disposed via recycler). Based on the proper disposal and lack of unauthorized releases or violations, the above listing does not represent a significant environmental concern.
- ASPAC Investment Co. (659 South Bonnie Brae Street) - This historical address for the Project Site is listed on the Statewide Environmental Evaluation and Planning System Underground Storage Tank (SWEEPS UST) and Facility Inventory (CA FID UST) databases. The SWEEPS UST database does not identify any USTs at the Project Site and the CA FID UST database indicates that this site is currently inactive. Former USTs at the Project Site are further discussed below.

In our opinion, none of the other sites listed on the regulatory database report pose a significant threat to the Project Site as there is no indication of a release at the respective sites, a release has occurred but groundwater has not been impacted, a release has occurred but the case is closed, or the sites are located cross or down gradient of the Project Site and in excess of 1/10 mile from the Project Site.

The user did not provide EFI Global Inc. any information either verbally or in writing (i.e. Title Report) regarding environmental cleanup liens or activity and use limitations encumbering the Project Site. An environmental lien search was not requested by the user; however, based on our review of the Department of Toxic Substances Control (DTSC) EnviroStor Database, no environmental liens enforced by the DTSC were identified.

The following documents were provided to EFI Global, Inc. by the Report User.

- Environmental Managers & Auditors, Inc., Limited Subsurface Soil Sampling and Testing, dated December 27, 2000 - This report discusses a September 1994 soil gas survey in the area of the former gasoline station (1950-1960s), which identified the presence of petroleum hydrocarbon contamination at the site. Five (5) borings were advanced in the area of the former gasoline station for this assessment (maximum depth of 20 feet below ground surface [bgs] with soil samples collected every 5 feet). The following maximum concentrations were detected: total petroleum hydrocarbons (TPH) at 7,530 milligrams per kilogram (mg/kg), benzene at 28,200 mg/kg, toluene at 26,000 mg/kg, ethylbenzene at 54,800 mg/kg, xylenes at 162,000 mg/kg, and methyl tert-butyl ether (MTBE) at 83,400 mg/kg. The deepest soil samples (approximately 20 feet bgs) were non-detect.
- Enviropro Inc., Preliminary Report on Environmental Site Assessment of Gasoline Spill Contributors conducted at 1930 Wilshire Boulevard, dated August 23, 2001 - This report included a historical and regulatory agency information review. Enviropro Inc. identified three potential contributors to soil contamination at the 1930 Wilshire Blvd property: (1) 1925 Wilshire Boulevard, (2) 1930 West 6th Street, and (3) 668 South Bonnie Brae Street.
- EEI, Phase II Site Assessment, dated January 2002 - EEI advanced 10 soil borings to approximately 30 feet bgs. Five of the borings were converted to temporary groundwater monitoring wells. The borings were located primarily in the northeastern portion of the Project Site (area of former onsite gasoline station). Maximum soil concentrations include the following: benzene at 0.39 mg/kg, toluene at 0.037 mg/kg, ethylbenzene at 21 mg/kg, xylenes at 26 mg/kg, 1,2,4-trimethylbenzene at 80 mg/kg and 1,3,5-trimethylbenzene at 22 mg/kg. Notable maximum groundwater concentrations include the following: benzene at 1,800 micrograms per liter (µg/L), toluene at 970 µg/L, ethylbenzene at 200 µg/L, xylenes at 300 µg/L, and TBA at 1,300 µg/L.
- EEI, Additional Phase II Report, dated November 20, 2002 - In August and November of 2002, EEI collected soil samples from four (4) soil borings (TW13, TW16, TW17, TW18) drilled to maximum depth of 25 feet bgs. These borings were also converted into temporary groundwater monitoring wells. The boring locations extended to the southwestern portion of the Project Site. Maximum soil concentrations included toluene at 0.04 mg/kg, xylenes at 0.82 mg/kg, n-butylbenzene at 1,860 mg/kg, naphthalene at 6,060 mg/kg, and pentachloroethane at 956 mg/kg. On October 3, 2002, EEI collected groundwater samples from seven previously-installed temporary monitoring wells. Maximum groundwater concentrations included MTBE at 63 µg/L, benzene at 1650 µg/L, toluene at 949 µg/L, ethylbenzene at 140 µg/L, xylenes at 686 µg/L, naphthalene at 17 µg/L of naphthalene, 1,2,4-trimethylbenzene at 63 µg/L, 1,2-dichloroethane at 202 µg/L, isopropylbenzene at 4.9 µg/L, and n-propylbenzene at 5.4 µg/L. EEI concluded that the soil/groundwater benzene plume exists beneath the northeastern corner of the Project Site, but appeared to be confined both laterally and vertically in this area. Regulatory agency records for the former gasoline station on the northeastern corner (1900 Wilshire Boulevard) and a fueling station located on the southeastern portion (659-661 South Bonnie Brae Avenue) are discussed below.

- The City of Los Angeles NavigateLA Online Mapping System was reviewed to obtain substructure maps for the Project Site. According to a review of the substructure maps, two USTs were identified near the center portion of the Project Site. The two USTs appear to be located in the vicinity of the 659-661 Bonnie Brae Avenue property. Former USTs at this property are discussed below.
- The Division of Oil, Gas, and Geothermal Resources (DOGGR) Online Mapping System was reviewed for information pertaining to oil and gas exploration on or nearby the Project Site. No oil wells were identified within 500 feet of the Project Site.
- The Los Angeles Regional Water Quality Control Board (LARWQCB), Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), Los Angeles County Department of Public Health, Public Health Investigation (PHI), Los Angeles Bureau of Sanitation (LABS), and the Los Angeles Fire Department (LAFD) Central Industrial Unit (CIU), Hazardous Materials Division (HMD), and Underground Storage Tanks Division (USTD) were contacted regarding hazardous materials, underground storage tank, industrial wastewater, and air emissions equipment files for the Project Site. Additionally, the State Water Resources Control Board's GeoTracker database, the DTSC's EnviroStor and Hazardous Waste Tracking System (HWTS) databases, and the SCAQMD's Facility Information Detail (FIND) database were reviewed for the Project Site. According to responses from the above agencies and review of the above databases, there are no files for the Project Site with the exception of the following:
- SCAQMD and FIND files includes permits for the onsite diesel-powered emergency generator from 2004 and 2011. No violations or unauthorized releases were identified for the generator. Two Notices of Violation (NOVs; from 2003 and 2011) were issued to the Project Site for the improper operation of boiler units for the property building. Both NOVs were subsequently abated. Furthermore, according to Mr. Lafreniere, the Chief Engineer for the property building, the out-of-compliance boiler units are no longer in use. The review of SCAQMD did not identify any significant environmental concerns.
- HWTS records consist of the hazardous waste manifest records discussed previously above and do not represent a significant environmental concern at this time.

Available LABS records include various wastewater discharge permits (for 1930 Wilshire Boulevard only). In 1963, a permit was issued to discharge boiler blowdown and water softener backwash into the sewer (treated via special size trap). This permit was originally issued in 1952. In 1964, a permit was issued to discharge cooling water from an x-ray unit. In 1978, a permit was issued to discharge air conditioning and boiler blowdown. In 1979, a permit was issued to discharge medical lab waste and refrigeration/boiler blowdown. In 1982, a permit was issued to discharge air conditioning bleed off and boiler blowdown. In 1997, a permit was issued to discharge cooling tower blowdown. In 2004 and 2007, permits were issued for dental office and dental laboratory discharges. No outstanding violations or unauthorized releases were identified in the above records. The review of LABS records did not identify any significant environmental concerns.

LAFD HMD records were available for 1926 and 1930 Wilshire Boulevard and consisted primarily of hazardous material inventories and permits from 1993-2014. Hazardous materials listed include various photochemicals (fixer and developers for onsite medical facilities) and cooling tower chemicals (GCO 10). No violations were listed for the above chemical use. Based on this, the LAFD HMD records do not represent a significant environmental concern. Available LAFD USTD and LAFD CIU records include various permits and correspondences related to underground storage tanks (USTs) at the Project Site. LAFD USTD and CIU records for the 1900 Wilshire Boulevard property and 661-681 South Westlake Avenue are described as follows:

1900 Wilshire Boulevard - In 1936, four USTs were reportedly installed: three 1,500 gallon gasoline USTs and one 120-gallon waste oil UST. These USTs were reportedly installed 20 feet west of the onsite building and four feet underground. This appears to have been within the alley way to the east of the current onsite building; however, the exact locations were not provided and could not be confirmed. Circa 1950, one of the 1,500-gallon gasoline USTs was removed and replaced with another 1,500-gallon gasoline UST; another 1,500-gallon gasoline UST was abandoned in place and filled with sand at that time. In 1954, a 1,500-gallon UST and the 120-gallon UST were abandoned in place (filled with sand). In 1965, four USTs (three 1,500-gallon and one 120-gallon) were removed from the Project Site. No confirmation sampling records were provided during the time of the removal. Prior environmental investigations for the former gasoline station are discussed in the User Provided Documents above. On April 30, 2001, EnviroPro, Inc. issued a letter notifying the LAFD USTD that an unauthorized release/contamination had occurred under the property located at 1900-1936 Wilshire Boulevard. Based on the results from the "Limited Subsurface Soil Sampling and Testing Report" from December 2000 (discussed above), soils were determined to contain elevated concentrations of benzene and MTBE. On May 17, 2001, the LAFD issued a Fire/Life Safety Violation which requested compliance on the following items: development of a workplan that must be submitted and approved by the LAFD, prepare a site assessment certified by a registered geologist or engineering geologist, testing of petroleum compounds (TPHg, TPHd, BTEX, and MTBE), and advancement of borings that extend to a minimum of 20 feet below the lowest level of non-detection.

659-661 South Bonnie Brae Avenue - In 1936, two 550-gallon gasoline USTs were installed in this portion of the Project Site. In 1944, a 1,000-gallon gasoline UST was installed. In January of 1948, a 550-gallon UST was removed. In February of 1948, a 1,000-gallon gasoline UST was installed. In 1950, two 1,000-gallon gasoline USTs and one 280-gallon waste oil UST were installed. In 1953, one 1,000-gallon UST was removed and one 1,000-gallon UST was abandoned in place (filled with sand). Also in 1953, two 2,000-gallon gasoline USTs were installed. Site plans and descriptions appear to indicate that the USTs were installed along the alleyway that runs through the center of the Project Site; however, the exact locations of the USTs could not be confirmed. Fire permits were available for the onsite fueling station from 1944, 1965, 1974 and 1977. On January 13, 1987, the LAFD approved a permit to remove/abandon one atmospheric tank at 659 South Bonnie Brae. No removal records were available for any of the other USTs. Furthermore, no sampling data specific to these USTs were available.

Based on the above information, it is unclear whether all of the former onsite USTs have been removed from the Project Site. The results of the prior environmental investigations (summarized above) confirm

that the former fueling and auto repair operations have negatively impacted the property subsurface and that further assessment is necessary to determine the extent of these impacts. Therefore, the subsurface contamination identified by previous investigation in the areas of the former fueling stations and auto repair facilities on the northeastern and southern portions of the Project Site represent a recognized environmental condition. A Phase II and Closure Report was conducted (summarized below) in which a geophysical survey indicated that there is no evidence of USTs or former UST cavities identified in the surveyed areas.

Additional Issues

- Based on the age of the onsite structure, there is a potential for asbestos containing building materials and lead-based paint at the site. However, no testing was completed as part of this report. Suspect materials (vinyl tile, acoustical tile, spray-on texture, drywall, stucco, roofing material) and painted surfaces were observed to be primarily in good to fair condition. Prior to any renovation or demolition work, a comprehensive survey must be conducted.
- According to our research, radon potential at the Project Site is considered low.
- EFI Global, Inc. did not observe visible or olfactory indications of the presence of mold, nor did EFI Global, Inc. observe obvious indications of significant water damage. Stained ceiling tiles (from leaking HVAC equipment) were observed throughout the property building. No sampling was conducted as part of this assessment.
- The City of Los Angeles Department of Building and Safety methane zone data was reviewed to determine if the Project Site is located in a methane or methane buffer zone. According to the information reviewed, the Project Site not located within a methane or methane buffer zone.

Conclusion

EFI Global has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice 1527-13, at 1930 Wilshire Boulevard, Los Angeles, California, the Project Site. This assessment has revealed no evidence of recognized environmental conditions in connection with the Project Site except for the following:

- Recognized Environmental Conditions (REC) - The former fueling stations and auto repair facilities on the northeastern and southern portions of the Project Site represent a recognized environmental condition.
- Historical Recognized Environmental Conditions (HREC) - In our opinion, no HRECs were revealed during the course of our assessment.
- Controlled Recognized Environmental Conditions (CREC) - In EFI Global's opinion, no CRECs were revealed during the course of our assessment.

- Recommendations - Based upon the foregoing a Phase II Environmental Site Assessment is recommended. Based on this recommendation, EFI completed a Phase II, which is summarized below and included as an Appendix to this MND.

Phase II and Closure Report

According to information obtained from previous environmental investigations, the northeast portion of the Site was used for gas station and auto repair operations from 1936 through 1956. Historical records indicate that several underground storage tanks (USTs) were removed or abandoned in place. Information regarding additional tank removal or subsequent soil sampling was not identified. Previous environmental assessments included soil sampling and the installation of approximately eight groundwater monitoring wells. Analytical results for soil and groundwater samples from previous assessments indicated the presence of petroleum hydrocarbons and fuel-related volatile organic compounds (VOCs).

As part of an initial site inspection, EFI Global identified six existing groundwater monitoring wells at the Site, with four of the wells containing measurable water. Water samples were collected and analyzed from the four wells and analytical results indicate the presence of petroleum hydrocarbons and fuel-related VOCs.

Based on the water analytical results and on the finding in the Phase I Environmental Site Assessment (ESA) Report dated August 15, 2016 that a gasoline service station occupied the property from approximately 1950 to 1953, EFI Global conducted additional subsurface investigation to further evaluate the petroleum hydrocarbon and VOCs in subsurface soils at the Site. Initially, a geophysical survey was conducted, with no evidence of existing USTs or UST cavities identified at the Site. A total of seven soil borings (B1 through B7) were strategically advanced around the Site to a maximum depth of 35 feet bgs.

Analytical results of soil samples collected during drilling identified the presence of residual petroleum hydrocarbons and fuel-related VOCs in soil down to 15 feet bgs. Detections did not exceed regulatory guidelines, and the soil impacts appear to be localized to the northeast portion of the Site and limited in extent.

Four of the seven borings were converted into groundwater monitoring wells; however, groundwater was not encountered during this assessment and the wells remain dry. Furthermore, groundwater was not encountered to the maximum exploration depth of 71.5 feet bgs during recent geotechnical drilling at the Site. Based on the lack of observed groundwater to 71.5 feet bgs, it is suspected that water encountered in the wells installed during previous environmental investigations is not representative of either the water table or confined aquifer conditions at the Site. Rather, the standing water in the well casings appears to be a remnant from a wetter time when a shallow perched groundwater zone was present beneath the Site.

Based on the results of this assessment, the Site is a good candidate for formal case closure under the Low Threat Underground Storage Tank Case Closure Policy (LTCP), as adopted by the SWRCB. Following site closure, excavation of soils during redevelopment of the Site will be conducted under a Soils Management Plan.

Conclusions

EFI Global conducted water sampling from four of the existing on-site groundwater monitoring wells, conducted a geophysical survey in select areas of the Site, and collected additional soil samples in strategic locations across the Site to further evaluate the petroleum hydrocarbon and fuel-related VOCs previously detected at the Site:

- On June 10, 2016, EFI Global mobilized to the Site to identify and inspect the existing groundwater wells. Wells TW-3, TW-16, TW-17, TW-18, DPT-2, and DPT-8 were observed and inspected and any remaining wells were not located. Of the six groundwater monitoring wells located, only four (DPT-8, TW-3, TW-16, and TW-18) contained measurable water. It is suspected that water encountered in DPT-8, TW-3, TW-16 and TW-18 is not representative of either the water table or confined aquifer conditions at the Site.
- On June 15, 2016, Blaine Tech collected grab groundwater samples from existing groundwater monitoring wells DPT-8, TW-3, TW-16, and TW-18. All groundwater samples were analyzed for TPHcc, BTEX and OXYs.
- On July 15, 2016, EFI Global field personnel directed SSS in performing a geophysical survey at the Site.
- On July 15 and 16, 2016, a total of seven borings (B1 through B7) were advanced throughout the Site to depths ranging between 15 and 35 feet bgs. Soil samples were collected and analyzed for TPHcc, BTEX, and fuel oxygenates. Soil borings B1 through B4 were converted to groundwater monitoring wells. However, groundwater was not encountered during drilling or during gauging of the wells on July 16, 2016.

The following are EFI Global's Conclusions for the Site based on the acquired data:

- TPH, BTEX, and fuel oxygenates were detected in water samples collected from existing wells. However, based on the lack of presence of groundwater during this assessment to 35.5 feet bgs and during the geotechnical investigation (maximum exploration depth of 71.5 feet bgs), it is suspected that water encountered in DPT-8, TW-3, TW-16 and TW-18 is not representative of either the water table or confined aquifer conditions at the Site. Rather, the water in the well casings is likely remnant/residual standing water from a historically wetter time when an ephemeral perched water zone was present beneath the Site. As such, EFI Global does not consider the collected water to be representative of water table conditions, and groundwater is considered to be present beneath the Site at depths greater than 71.5 feet bgs.
- The geophysical survey did not produce any evidence of current USTs or former UST cavities at the Site.
- TPH-g and TPH-o were detected in up to five of 37 soil samples, but their respective MSSSLs were not exceeded in any samples analyzed. Therefore, detected petroleum hydrocarbons are not expected to

present a significant threat to groundwater. This conclusion is supported by the by the non-detect concentrations in deeper samples collected from the locations with detected TPH-g and TPH-d, indicating attenuation with depth.

- BTEX and TBA were detected in up to seven of 37 soil samples. The detected concentrations of these fuel-related VOCs did not exceed their respective RSLs. Therefore, VOCs in soil do not appear to represent a significant risk to human receptors.
- Based on the non-detect concentrations at depths between 25-30 feet bgs, the lack of observed groundwater to a maximum depth of 71.5 feet, and the lithology beneath the Site (relatively impermeable siltstone bedrock), detected VOC concentrations in soil are not considered to represent a threat to groundwater.

The following are EFI Global's Recommendations for the Site based on comparison to the LTCP criteria:

- Comparing maximum detected concentrations of the benzene and ethylbenzene in soil to the values for commercial/industrial properties (see Appendix G-3 of this MND), it is clear that no maximum detected concentrations of these driving constituents exceed the values of the LTCP. This indicates the residual impacted soils could remain in-place without significant risk of adversely affecting the health of ground level commercial site occupants. Accordingly, maximum detected soil concentrations of VOCs indicate the Site is a potential candidate for low threat closure according to the soil criteria.
- Although no secondary source removal from the Site has been reported in the documents reviewed, it appears the remaining concentrations of fuel constituents have attenuated to very low levels which, in our professional opinion, do not warrant removal by excavation. Accordingly, based on the LTCP criteria for VOCs in soil, corrective remedial action with respect to VOCs in soil should not be necessary at this commercial Site to achieve case closure and is thus not recommended. As such, EFI Global respectfully requests that the LARWQCB issues a uniform closure letter for the Site under the LTCP.
- It is recommended that excavation activities during redevelopment are conducted under an SMP prepared by a qualified environmental professional to ensure the proper handling of petroleum-impacted soil.

This potential issue with soils will be mitigated to a less than significant level by **Mitigation Measure 8-1**, which is compliance with the requirements and conditions of the Soils Management Plan, prepared by EFI Global (included as Appendix G-3 to this MND). Therefore, impacts would be less than significant.

Methane

The Project Site is not within a Methane Zone.⁸⁸

Operational Health Hazards

Environmental impacts to human health may result from project implementation due to a release of chemical or microbiological materials into the community, or from a lack of vector control. The following Project Design Feature would ensure that operational health hazards are less than significant:

Project Design Feature

PDF-8-1 Human Health Hazard (Vector Control)

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

Regulatory Compliance Measures

Exposure to materials, such as asbestos and lead, during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. The Project Site is required to comply with methane regulations per the LAMC. Compliance with regulations will ensure that impacts are less than significant. The Project will comply with the following regulatory compliance measures:

RCM-8-1 Explosion/Release (Existing Toxic/Hazardous Construction Materials)

(Asbestos) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

(Lead Paint) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials

⁸⁸ ZIMAS search: <http://zimas.lacity.org/>.

be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

(Polychlorinated Biphenyl) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

Mitigation Measure

MM-8-1 Soil Management Plan

The Project shall comply with the recommendations and conditions contained within the Soils Management Plan prepared by EFI Global, dated August 19, 2016 for the Project, and as it may be subsequently amended or modified.

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

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is in proximity to the following schools:⁸⁹

- Camino Nuevo Charter Academy, (Burlington Campus), located at 697 S. Burlington Avenue, approximately 200 feet south
- Camino Nuevo Charter Academy (Early Education Campus), located at 661 S. Burlington Avenue, approximately 200 feet southeast
- Esperanza Elementary School, located at 680 Little Street, approximately 625 feet southeast
- Liechty Middle School, located at 650 S. Union Avenue, approximately 1,250 feet southeast
- MacArthur Park Primary Center School, located at 2300 W 7th Street, approximately 1,300 feet west

However, the Project will have a less than significant impact during construction (with regulatory compliance measures for asbestos, lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that adaptive reuse of existing structures does not emit hazardous materials. The schools would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other

⁸⁹ LAUSD and Google Maps.

emissions from the Site as listed in the project design feature below. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

Project Design Feature

PDF-8-2 Temporary construction fencing and sheeting typical for a demolition and construction project shall be placed along the periphery of the active construction areas to reduce dust and other emissions from the Project Site.

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

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists (see question b), above) and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California EPA:

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.⁹⁰

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.⁹¹

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.⁹² There are no active Cease and Desist Orders or Cleanup and

⁹⁰ California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, July 20, 2016.

⁹¹ California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, July 20, 2016.

⁹² California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, July 20, 2016.

Abatement Orders from the California Water Resources Control Board associated with the Project Site.⁹³ The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.⁹⁴ Therefore, as the Project Site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment, no impact would occur.

- 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?**

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard. The Project is not within an airport hazard area.⁹⁵ The Project Site is not located within two miles of a public airport. Therefore no impact would occur.

- 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. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no nearby private airstrips. Therefore, no impacts will occur.

- g) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Wilshire Boulevard, and would not interfere with any adopted emergency response plan or emergency evacuation plan. Major roadways throughout the City, such as Hoover Street, are selected disaster routes.⁹⁶ Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate

⁹³ California Environmental Protection Agency, Cortese List Data Resources, List of “Active” CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, July 20, 2016.

⁹⁴ California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, April 11, 2016.

⁹⁵ ZIMAS search: <http://zimas.lacity.org/>.

⁹⁶ Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the routes, and emergency access would be maintained at all times. The future traffic conditions with the Project show that none of the 14 study intersections would have a significant impact.⁹⁷

The Project Site is not within a Hillside Area.⁹⁸ The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Environmental impacts may result from Project implementation due to possible interference with an emergency response plan. However, these potential impacts will be mitigated to a less than significant level by **Mitigation Measure 8-2**. Therefore, impacts would be less than significant.

Mitigation Measure

MM-8-2 Emergency Evacuation Plan

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

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone⁹⁹ or in the wildlands fire hazard Mountain Fire District.¹⁰⁰ The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

⁹⁷ Gibson Transportation Consulting, July 2016.

⁹⁸ ZIMAS search: <http://zimas.lacity.org/>.

⁹⁹ ZIMAS search: <http://zimas.lacity.org/>.

¹⁰⁰ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

9. HYDROLOGY AND WATER QUALITY

This section is based on the following report, included as Appendix H of this IS/MND:

H Hydrology and Water Quality, EFI Global, June 13, 2016.

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

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.¹⁰¹ Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPs).

¹⁰¹ *Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities; Retail gasoline outlets"; Restaurants Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). <http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/>.*

(determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include

1. Infiltration Systems
2. Stormwater Capture and Use
3. High Efficiency Biofiltration/Bioretenention Systems
4. Combination of Any of the Above

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.¹⁰² The City is in compliance with all requirements of the NPDES Municipal Permit.¹⁰³ Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the total site area is 1.64 acres)¹⁰⁴, the Project Applicant will be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of

¹⁰² <http://water.epa.gov/polwaste/npdes/>.

¹⁰³ <http://www.lastormwater.org/about-us/npdes-municipal-permit/>.

¹⁰⁴ See Section 2, Project Description Table 2-1, Project Site.

a Storm Water Pollution Prevention Plan (SWPPP).¹⁰⁵ Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards, or discharge requirements, or otherwise substantially degrade water quality. BMPs are methods to prevent or control stormwater runoff and the discharge of pollutants. The plan requires (1) advance planning and training to ensure implementation of the BMPs, (2) erosion and sediment control BMPs in place until the area is permanently stabilized, (3) pollution prevention BMPs to keep the construction site clean and (4) regular inspection of the construction site to ensure proper installation and maintenance of BMPs.¹⁰⁶ Construction-related impacts to water quality will be less than significant. The Project shall comply with the following regulatory compliance measures.

Regulatory Compliance Measures

RCM-9-1 National Pollutant Discharge Elimination System General Permit

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

RCM-9-2 Low Impact Development Plan

Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan

¹⁰⁵ California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed April 11, 2016.

¹⁰⁶ <http://www.lastormwater.org/about-us/regulatory-mandates/>

shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RCM-9-3 Development Best Management Practices

The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

RCM-9-4 Waste Discharge Requirements (WDR)

The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the project would have to obtain coverage under this permit.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. In fact, by removing the existing surface parking uses and developing a hotel project, the type of urban runoff would likely improve in quality. The parking for the Project would be located within the building and not subject to rain that can create runoff. The Project would be required to submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles and the State Water Resources Control Board (SWRCB) for review and approval prior to development of any drainage improvements. In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality will be less than significant.

- b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a**

lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is MacArthur Park Lake. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby. Groundwater was not encountered to the maximum depth explored of 71 feet.¹⁰⁷

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.¹⁰⁸ The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with buildings and a surface parking lot. The Project will similarly occupy the entire Project Site with existing and new buildings. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Proper surface drainage is critical to the future performance of the Project. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper Site drainage should be maintained at all times. The Project Site is located in an urbanized area of the City. The Project Site is primarily occupied by a building and a surface parking lot. The Project will similarly occupy the entire Project Site with existing and new buildings. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the proposed project will not cause changes in existing drainage patterns or surface water bodies in a

¹⁰⁷ *Geotechnical Investigation*, GeoKinetics, July 29, 2016.

¹⁰⁸ LADWP, *Water, Sources of Water*: <https://www.ladwp.com/>, accessed April 11, 2016.

manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, impacts related to site drainage and erosion will be less than significant.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a 14-story building and a surface parking lot. The Project will similarly occupy the entire Project Site with buildings. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system on Wilshire Boulevard.¹⁰⁹ Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Additional discussion of the construction and operation impacts is discussed below.

Construction

The Project would require excavation for two subterranean levels and utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not

¹⁰⁹ *Navigate LA, Storm Drains Layer: <http://navigatela.lacity.org/navigatela/>.*

controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, “good housekeeping” procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these “good-housekeeping” practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the City of Los Angeles’ Low Impact Development (LID) Best Management Practices (BMPs), which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPs are incorporated into the Project design plans. Compliance with existing regulations would reduce the potential for construction water quality impacts to a less than significant level.

Operation

Activities associated with operation of the Project will not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing surface parking lot and developing a mixed-use project, the type of urban runoff would likely improve in quality. The parking for the Project would be located below grade, within the building and not subject to rain that can create runoff. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

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

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project would not be located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.¹¹⁰ Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based. The Site is not within a Flood Zone.¹¹¹ Therefore, the Project will not place housing within a 100-year flood hazard area and no impact will occur.

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

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.¹¹² Additionally, the Project Site is not located within a City-designated 100-year floodplain.¹¹³ The Site is not located within a 500-year special flood hazard area, which begins approximately south of Westminster Elementary.¹¹⁴ Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

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

No Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface

¹¹⁰ Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

¹¹¹ ZIMAS search: <http://zimas.lacity.org/>.

¹¹² FEMA, Flood Map Service Center: <https://msc.fema.gov/portal>, April 11, 2016.

¹¹³ Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

¹¹⁴ Navigate LA, Stormwater Layer: <http://navigatela.lacity.org/navigatela/>

water in the vicinity is the Hollywood Reservoir, approximately 5.4 miles northwest of the Project Site. The Project Site is not located within a potential inundation area.¹¹⁵ In addition, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.¹¹⁶

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.¹¹⁷

Therefore, the dams in the Los Angeles basin, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential dam or levee failure will not be exacerbated by the development of the Project. No impacts related to flooding will occur.

¹¹⁵ Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

¹¹⁶ Page II-16, Los Angeles Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

¹¹⁷ LADWP, Water System Reservoir Surveillance Program: http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf.

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

No Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.¹¹⁸ The Project is located approximately 12.5 miles away from the Pacific Ocean and is not located within an area potentially impacted by a tsunami.¹¹⁹

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.¹²⁰ The City's General Plan Safety Element has no areas around the Project Site identified as a bedrock or probable bedrock landslide area.¹²¹ Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impact related to tsunamis, seiches, and mudflow will occur.

¹¹⁸ Page II-16, Los Angeles General Plan Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>.

¹¹⁹ ZIMAs search: <http://zimas.lacity.org/>.

¹²⁰ ZIMAs search: <http://zimas.lacity.org/>.

¹²¹ Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed April 11, 2016.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site currently improved with an office building and surface parking lot. The Project's uses are compatible with the residential uses to the south, which are higher density multi-family units located in an urbanized area. Throughout the City and near the Project Site, there are similar hotel and residential uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. As such, impacts related to physical division of an established community will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in *Sequoyah*, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (*Friends of Lagoon Valley*).

The following is a list of applicable land use plans, policies, and regulations:

Regional Level

- *Southern California Association of Governments*
 - *Regional Comprehensive Plan and Guide (RCPG)*
 - *Regional Comprehensive Plan (RCP)*
 - *Regional Transportation Plan (RTP)*
- *South Coast Air Quality Management District's (SCAQMD)*
 - *Air Quality Management Plan (AQMP)*
- *Los Angeles County Metropolitan Transportation Authority's (Metro)*
 - *Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan*
- *Westlake Community Plan*
- *Westlake Redevelopment Plan and ZI-2275 Westlake Recovery Redevelopment Project*
- *ZI-2452 Transit Priority Area in the City of Los Angeles*
- *ZI-2374 Los Angeles State Enterprise Zone*
- *Los Angeles Municipal Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Comprehensive Plan and Guide (RCPG)

The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.
2. A proposed residential development of more than 500 dwelling units.
3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
5. A proposed hotel/motel of more than 500 rooms.
6. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.
8. A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.
9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.
10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.
11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.
12. A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapters overall goals are to:¹²²

- re-invigorate the region's economy,
- avoid social and economic inequities and the geographical dislocation of communities, and
- maintain the region's quality of life.

¹²² SCAG, RCPG Growth Management Chapter, page 3-1:
<http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf>.

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with and not interfere with implementation of the goals of the Growth Management Chapter of the RCPG. The Project would include a hotel, retail, office, restaurant, and residential uses providing additional jobs, revenue, and economic activity in the area. The Project would not dislocate a community or increase social or economic inequalities. The Project would include a hotel use near similar compatible uses, such as retail and restaurant uses in Westlake.

Regional Comprehensive Plan (RCP)

SCAG's RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and local governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. Table 3.10-1, SCAG Regional Comprehensive Plan, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

Regional Transportation Plan (RTP)

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making the best transportation and land use choices for the future and supporting those choices with wise investments. The RTP will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP will create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2040. The RTP is built on the vision of mobility, economy, and sustainability.¹²³ The RTP contains goals and policies that are directed to transportation planners and

¹²³ SCAG, RTP: <http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>.

decision-makers. They are not applicable to local and private projects, such as this Project. Nonetheless, they are provided below:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness
2. Maximize mobility and accessibility for all people and goods in the region
3. Ensure travel safety and reliability for all people and goods in the region
4. Preserve and ensure a sustainable regional transportation system
5. Maximize the productivity of our transportation system
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
7. Actively encourage and create incentives for energy efficiency, where possible
8. Encourage land use and growth patterns that facilitate transit and non-motorized transportation
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

Policies

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators
2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region
3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives
4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1
5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1
6. The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.

7. The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run
8. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan

Applicability of SCAG Plans

The goals and policies of the RCPG, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206, which SCAG uses to determine regionally significant projects.¹²⁴ The threshold size for a proposed hotel/motel is 500 or more rooms. The threshold size for a commercial building is employing more than 1,000 persons or more than 250,000 square feet. The Project would not meet the thresholds for a regionally significant project. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, RCP, or RTP.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP).¹²⁵ The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

The 2012 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management. As demonstrated in the Air Quality analysis section above, the Project would not result in significant regional emissions. In addition, implementation of the Project would not interfere with air pollution control

¹²⁴ CEQA, Section 15206, *Projects of Statewide, Regional, or Areawide Significance*: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, accessed February 20, 2014.

¹²⁵ SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>.

measures listed in the 2012 AQMP. Additionally, the Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. The Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP. See Section 16, Transportation and Traffic, question b), in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion:

“Based on the trip generation and distribution of the project, it is not expected that 50 or more new project trips per hour would be added at Wilshire and Alvarado CMP intersection. Therefore, no further analysis of potential CMP impacts is required. In addition, the Project is expected to add less than 150 new trips per hour, in either direction, to any freeway segments based on the project trip generation.”

Therefore, no further analysis of CMP freeway monitoring stations is required.¹²⁶

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.¹²⁷ The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

¹²⁶ *Traffic Study*, Gibson Transportation Consulting, July 2016. Included in the Appendices.

¹²⁷ *California Government Code Section 65300.*

The Project Site is designated Regional Center Commercial and Community Commercial.¹²⁸

Regional Centers¹²⁹

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Land Use Framework Element identifies the Project Site as Regional Center Commercial. Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and wellbeing necessary for ensuring public nighttime use of transit facilities. They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services. Physically, the regional centers are generally characterized by three forms of development:

1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.
2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.
3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

Community Commercial¹³⁰

¹²⁸ ZIMAS search: <http://zimas.lacity.org>

¹²⁹ General Plan, Chapter 3-Land Use: <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm>.

The land use definition "General Commercial" applies to a diversity of retail sales and services, office, and auto-oriented uses comparable to those currently allowed in the "C2" zone (including residential). They are located outside of districts, centers, and mixed-use boulevards and occur at the intersections of major and secondary streets, or as low rise, low-density linear "strip" development along major and secondary streets.

Table 3.10-2, General Plan Land Use, lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable policies of the General Plan for each land use (within a developer's control or developer focused).

Westlake Community Plan

The Project Site is located within the Westlake Community Plan (WCP), which was adopted in September 1997.¹³¹ Table 3.10-3, Westlake Community Plan, sets forth the WCP's objectives for residential and commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals, objectives, and policies of the Westlake Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

The Project would also implement and be consistent with the applicable goals and policies of the General Plan and the General Plan Framework. The Project includes a mix of urban infill uses (hotel, residential, cultural and performing arts center, parking) with bicycle parking and is located near public transit. Additionally, the Project would promote economic development by providing a number of construction and permanent jobs. The Project supports and promotes a pedestrian oriented streetscape along Wilshire Boulevard, Westlake Avenue, and Bonnie Brae Street.

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). The Project provides on-site open spaces including a courtyard and on the residential, cultural center, and parking structure roof-tops. The Project would provide natural surveillance and transition zones due to the large glass windows and distinction between public space and private building.

Westlake Redevelopment Plan and ZI-2275 Westlake Recovery Redevelopment Project

All applications within the Westlake Recovery Redevelopment Project Area requesting a permit for construction, remodeling, improvements, alterations including seismic compliance, demolition and/or signs must be referred to the Community Redevelopment Agency (CRA) for both CEQA clearance and permit approval.¹³² On December 29, 2011, the California Supreme Court issued its decision in *California*

¹³⁰ *General Plan, Chapter 3-Land Use*: <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03.htm>

¹³¹ *Westlake Community Plan*: <http://cityplanning.lacity.org/complan/pdf/wlkcptxt.pdf>.

¹³² <http://zimas.lacity.org/documents/zoneinfo/ZI2275.pdf>.

Redevelopment Association v. Matosantos. The decision upheld recently enacted state law dissolving all California redevelopment agencies including the CRA/LA and made the dissolution of the agencies effective February 1, 2012. For purposes of this analysis, any references to the former CRA/LA are intended to mean the Designated Local Authority pursuant to changes in state law as discussed above. CRA is statutorily prohibited from entering any new agreements and is currently only allowed to wind down CRA affairs, including honoring existing obligations and addressing land use issues consistent with CRA's land use powers under the Redevelopment Plan. To date, the CRA has not transferred its land use powers to the Los Angeles Department of City Planning.

The Westlake Redevelopment Plan objectives include the following general topics: Commercial; Safety; Housing; Public; Transportation and Traffic; Services; General; Public Art. The Project would promote the economic well-being of the area by increasing the tax revenue at the Site, redevelop the parking lot into a cultural center, and include a hotel use. The Project would enhance the safety of the area by removing a parking lot and fencing and building uses that increase the population and employees at the Site providing a natural surveillance around the Site into the night. The Project would add housing to the Site. The other objectives are for government policies and services. As shown in Table 3.10-4, the Project would thus not conflict with the Westlake Redevelopment Plan.

ZI-2452 Transit Priority Area in the City of Los Angeles

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant 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.¹³³

The Project contains multiple uses, include hotel, residential, and cultural center. An apartment hotel is classified as a residential building designed or used for both two or more dwelling units and six or more guest rooms or suites of rooms.¹³⁴ The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.¹³⁵ The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit

¹³³ <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

¹³⁴ LAMC Section 12.03. The City classifies an apartment hotel as a residential use.

¹³⁵ California Public Resources Code Section 21099(a)(4).

stop.¹³⁶ The Project Site is within one block east of the Metro Red and Purple Line Westlake/MacArthur Park Station as well as multiple Metro and LADOT DASH lines.

ZI-2374 Los Angeles State Enterprise Zone

The Site is within an Enterprise Zone/Employment and Economic Incentive Program Area (EZ). The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZ special provisions applicable to plan check include parking standards and height.¹³⁷

Vacations

Balconies will project into the right-of-way (ROW) of the street by approximately 5' along a portion of Wilshire Blvd and those projections will need to be approved as airspace vacations that will be processed with the Final Tract Map. There will be two balcony airspace vacations processed with the map. These balconies will provide a scenic view of downtown Los Angeles for the Community. In addition, a vacation of approximately 7' of a remnant piece of alley no longer necessary also will be vacated together with the Tract Map.

City of Los Angeles Planning and Zoning Code

The Project will require approval of the following discretionary actions:¹³⁸

1. **General Plan Amendment (GPA).** General Plan Amendment to change the split Regional Center Commercial and Community Commercial land use designations and to apply the Regional Center Commercial land use designation to the entire site, and to exempt a portion of the Project Site (approximately 16,556 square feet of the 70,906 square-foot Project Site) from Community Plan Footnote No. 2, which limits certain areas to Height District No. 2.
2. **Density Bonus (DB).** A 35% density bonus to increase the unit density from 354 units to 478 units, 35% floor area increase from 541,330 square feet to 730,796 square feet, and floor area averaging over the 10 contiguous lots and three commercial zones of the Project Site. (LAMC 12.22.A.25(g)(2) and/or LAMC 11.5.11)
3. **Site Plan Review (SPR).** Site plan review for any development project which creates, or results in an increase of 50 or more dwelling units or guest rooms. (LAMC 16.05.C.1.)
4. **Vesting Conditional Use (VCU).** A Vesting Conditional Use Permit for a hotel in a C4 zone within 500 feet of an R zone. (LAMC 12.24.T.)

¹³⁶ California Public Resources Code Section 21099(a)(7).

¹³⁷ ZI-2374: <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>.

¹³⁸ Client representative, May 2016.

5. **Conditional Use (CUB).** A Conditional Use to permit the sale or dispensing for consideration of alcoholic beverages, including beer and wine, for consumption on the premises or off-site of the premises. (LAMC 12.24.W.1)
6. **Development Agreement (DA).** A Development Agreement (DA) between the City of Los Angeles (City) and the Applicant will be prepared pursuant to Government Code Sections 65864-65869.5.
7. **Vesting Tentative Tract Map (VTT).** A merger and re-subdivision of the Project Site for airspace subdivision purposes, including any necessary vacations and haul routes. (LAMC 17.15)
8. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, revocable permits, building permits and other Department of City Planning approvals.

Conclusion

The requested discretionary actions do not conflict with existing land uses in the area, and the Project would not introduce incompatible uses. The Project is consistent with SCAG guides and other regional guides, the General Plan, the WCP goals, objectives and policies related to commercial use and urban design guidelines, to the extent feasible and applicable, as discussed above and below in Tables 3.10-1 to 3.10-4.

Footnote No. 2 of the General Plan limits certain areas to Height District No. 2, which is inconsistent with the existing zoning of the entire Site. Thus, with the approval of the requested General Plan Amendment, the Project would be consistent with the Community Plan land use designation for the Project Site. Implementation of the requested General Plan Amendment would support the intent of the General Plan and Community Plan with regard to the amount of development and range of land uses for development sites that serve regional commercial needs. As such, impacts would be less than significant.

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

No Impact. A significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized and fully developed portion of the City. Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. Therefore, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

Table 3.10-1
SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing¹	
<p>LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
Open Space and Habitat²	
<p>OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space 	<p>Consistent. The Project is an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located in a developed and urban area of the City surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site.</p> <p>The Project would not impact any protected trees. However, environmental impacts may result due to the loss of any trees on the Site. The potential impacts will be mitigated to a less than significant level with Mitigation Measure 4-1.</p>

Policies	Discussion
resulting from implementation of regionally significant projects.	
OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	Consistent. The Project Site would not impede access to natural lands for outdoor recreation such as the nearby MacArthur Park.
OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	Consistent. The Project is an infill development in an existing community.
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-12 Developers and local governments should promote water-efficient land use and development.	Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	Consistent. The Project contains multiple uses (hotel, residential, cultural and performing arts center, and parking) and be a redevelopment of an urban area.
Water ³	
WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	Consistent. The Project includes conservation features to reduce operational water use.
WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.	Consistent. Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form of conjunctive use utilizes artificial recharge, where surface water is intentionally percolated or injected into aquifers for later use. The Project would not conflict or

Policies	Discussion
	preclude the City from exploring conjunctive use as a water management strategy.
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	Consistent. The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project Applicant will implement any upgrade to the water infrastructure serving the Project Site that is needed to accommodate the Project's water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	Consistent. The Project includes landscaping around the periphery of the Project Site, on the roof-tops of the residential tower, cultural center, and parking structure, and in courtyard areas. The landscaping will be irrigated with water conservation techniques.
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	Not Applicable. The Project will not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	Consistent. The Project Site consists of impermeable surfaces as it is almost fully paved and developed. The Project will not result in a change in the amount of impervious surface area at the Project Site.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	Consistent. The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy ⁴	
EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: <ul style="list-style-type: none"> Mixed-use residential and commercial development that is connected with public 	Consistent. The Project is a mixed-use hotel, residential and cultural center development that is located near local and regional transit lines. The Project will encourage biking and walking trips with bicycle parking and ground-floor pedestrian attractions.

Policies	Discussion
<p>transportation and utilizes existing infrastructure.</p> <ul style="list-style-type: none"> Land use and planning strategies to increase biking and walking trips. <p>EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> Using energy efficient materials in building design, construction, rehabilitation, and retrofit Encouraging new development to exceed Title 24 energy efficiency requirements. Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. Encouraging neighborhood energy systems, which allow communities to generate their own electricity Orienting streets and buildings for best solar access. Encouraging buildings to obtain at least 20% of their electric load from renewable energy. 	<p>Consistent. The Project will be in compliance with the City's Green Building Ordinance, which contains energy efficient practices.</p>
<p>EN-11 Developers and local governments should submit projected electricity and</p>	<p>Consistent. Electrical service is available and will be provided in accordance with the</p>

Policies	Discussion
natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.	LADWP's Rules Governing Water and Electric Service. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety, as included in Mitigation Measures 17-1 and 17-2 . In the event that Southern California Gas (SCG) cannot provide service from the existing infrastructure, SCG will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.
EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	Consistent. The Project will have pre-wiring for future solar facilities and off-grid pre-wiring for future solar facilities.
EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	Consistent. The Project is located in an urban area with significant infrastructure to facilities providing alternative transportation to reduce single occupancy vehicle trips, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and the LADOT DASH buses and the Metro Red Line Westlake station.
Solid Waste⁵	
<p>SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). 	Consistent. The Project would include a demolition and construction waste recycling program as well as an operational recycling program. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

Policies	Discussion
<ul style="list-style-type: none"> • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	Not Applicable. The Project is not a composting, or composting, recycling, or conversion technology facility.
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	Not Applicable. The Project is not a waste management facility.
SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	Not Applicable. The Project is not an eco-industrial park.
SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	Not Applicable. The Project is not a solid waste management facility.
<p>SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf ¹ Page 21; ² Pages 34 and 39; ³ Pages 59-61; ⁴ Pages 75-76; ⁵ Pages 105-106; Table: CAJA Environmental Services, April 2016.</p>	

Table 3.10-2
General Plan Land Use

Goal, Objective, Policies	Discussion
Regional Centers	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	Consistent. The Project would create a mix of uses (hotel, residential, cultural and performing arts center, and parking) that provides jobs and culture, and serves the region.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	Consistent. The Project would create a mix of uses ((hotel, residential, cultural and performing arts center, and parking)) that provides jobs and is served by the Metro Red Line at a nearby station, which provides access to the greater region. The uses are compatible with other existing uses in the area. The Project will also enhance urban lifestyles by developing a size and scale more appropriate for an urban regional center compared to the Project Site's existing underutilized condition.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans	Consistent. The Project would create a hotel and residential development that serves the region and is accessible due to the Metro Red Line at a nearby stations. The commercial uses support the hotel uses and also would be available to the public. Table 3-1 of General Plan Land Use policy 3.10.1 states that Regional Commercial typically includes eating and drinking establishments, retail/commercial, and commercial overnight accommodations, among other uses. The Project would satisfy this requirement.
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	Not Applicable. A multi-modal transportation center is typically a location served by a variety of transportation agencies, types, services, and frequencies. The Project is an infill development in Westlake.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers. <i>Policy 3.16.1</i> Enhance pedestrian activity in areas designated as a Pedestrian-Oriented	Consistent. The Project is located along Wilshire Boulevard, which is a high pedestrian activity area. The Project includes ground-floor commercial uses and a design that enhances the pedestrian experience with glass storefronts and material and design changes on the upper levels to scale to pedestrians. Policy 3.16.1 is not applicable because the area is not designated –PD. The Project

Goal, Objective, Policies	Discussion
<p>District ("PD") by the design and siting of buildings in accordance with the policies contained in Chapter 5: Urban Form and Neighborhood Design.</p> <p><i>Policy 3.16.2</i> Locate parking in pedestrian districts to the rear, above, or below the street-fronting uses.</p> <p><i>Policy 3.16.3</i> Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.</p>	<p>would comply with the standards of the Urban Design Chapter of the Community Plan.</p> <p>Policy 3.16.2 is applicable, and parking would be provided on-site in a subterranean level consistent with this policy.</p> <p>Policy 3.16.3 is not applicable because the Project does not include ground level parking. Parking would be in subterranean levels.</p>
<p>Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.</p>	<p>Consistent. The Project will include public streetscape improvements including activated ground floor, cultural center art, and landscaping.</p>
<p>Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.</p>	<p>Neutral. The Project is an infill development with landscaping. The Project will provide 62,497 square feet of open space and amenities, including an amphitheater, observation deck, and terrace bar on the cultural center roof deck, and a swimming pool and fitness area on top of the apartment complex. Other aesthetic open space features provided by the new multi-cultural performing art center will enhance the community by providing a culturally inclusive learning/exchange center with a ground-level public plaza along its Wilshire street frontage.</p>
<p>Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.</p>	<p>Consistent. The Project lighting would be standard for hotel, residential, parking and cultural center uses. Lighting will be designed and installed with shielding if necessary.</p>
Community Commercial	
<p>GOAL 3H Lower-intensity highway-oriented and local commercial nodes that accommodate commercial needs outside centers and districts.</p>	<p>Consistent. The Project uses are highway-oriented and provide local commercial uses (such as cultural center).</p>
<p>Objective 3.12 Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.</p>	<p>Consistent. The Project would provide hotel and residential uses.</p>
<p>Policy 3.12.1 Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with <u>Tables 3-1</u> and 3-7. The range</p>	<p>Not Applicable. Table 3-1 (as part of the General Plan Land Use policy 3.10.1) states that General Commercial allow permitted uses by existing zoning for C2. The</p>

Goal, Objective, Policies	Discussion
and densities/intensities of uses permitted in any area shall be identified in the community plans.	Project's uses are permitted by the zoning. Table 3-7 (of the General Plan) states that General Commercial Land Use designation corresponds to C2 and [Q]C2 zones. The Project is zoned C2 and it would be maintained.
<p>Policy 3.12.2 Consider adjusting permitted densities of areas designated for General Commercial, where existing buildings are developed at densities substantially below the maximum permitted by amendments to the community plans, where appropriate, based on consideration of the following:</p> <ul style="list-style-type: none"> a. Where commercial parcels of less than 150 feet in depth abut areas designated for single-family residential; b. Where the total area and/or configuration of the commercial parcel precludes the development of adequate on-site parking, unless adjacent to a transit station or code-required parking is provided in a common parking facility in proximity to the site; c. Where site driveways may adversely impact traffic flows along principal streets or in adjacent residential neighborhoods; and/or d. Where there are local community objectives for the preservation of the prevailing scale and character of development. 	<p>Not Applicable. The Site is not a commercial parcel of less than 150 feet in depth. The Site does not preclude the development of adequate on-site parking. The driveways on Westlake and Bonnie Brae would not adversely impact traffic flows. The Project is of a scale and character that fits with the local area.</p>
<p>Policy 3.12.3 Permit the re-construction of existing commercial structures destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing intensity.</p>	<p>Not Applicable. The Project is not proposing reconstruction of existing commercial structures that were destroyed by a natural catastrophe.</p>
<p><i>General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm and http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm Table: CAJA Environmental Services, July 2016.</i></p>	

**Table 3.10-3
Westlake Community Plan**

Objective and Policies	Discussion
Residential	
Objective 1 To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.	Consistent. The Project provides residential uses with a variety of bedroom sizes.
Objective 2 To conserve and improve existing viable housing for persons desiring to live in Westlake, especially low and moderate income families	Not Applicable. The Project Site does not currently contain residential uses and would not result in a loss or displacement of housing as it proposes to add 478 units The Project will provide 39 very-low income affordable housing units.
Objective 3 To sequence housing development so as to provide a workable, efficient, and adequate balance between land use, circulation, and service system facilities at all times.	Not Applicable. The Project Applicant has no authority on other housing developments.
Policy 1 That the existing Low and Low Medium density housing be preserved where such housing is in relatively good condition or can be made so with moderate improvements.	Not Applicable. The Project Site does not contain housing to be preserved.
Policy 2 That medium density housing be located near commercial corridors where access to public transportation and shopping services is convenient and where a buffer from or a transition between low density housing can be achieved.	Consistent. The Project would include high density housing adjacent to the Metro Red Line Westlake Station.
Policy 3 That housing for the elderly have convenient access to public transportation, commercial services, recreational and health facilities.	Not Applicable. The Project is not a specified elderly housing facility.
Policy 4 That the City shall support continued affordability of units subject to termination of Federal mortgage or rent subsidies and expiring bond projects.	Consistent. The Project proposes to add 478 units. The Project will provide 39 very-low income affordable housing units..
Policy 5 That the City shall discourage the demolition of affordable housing unless there is adequate assurance that suitable equivalent replacement units will be made available.	Not Applicable. The Project Site does not contain affordable housing to be preserved.
Commercial	
Objective 1 To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.	Consistent. The Project provides a mix of hotel, residential, parking, and cultural center uses that would strengthen viable commercial development and provide new services within existing commercial areas. The Project will rehabilitate an existing historic commercial building and would also help to further activate Wilshire Boulevard.
Objective 2 To provide a range of commercial facilities at various locations to	Not Applicable. The Project Applicant has no authority on other commercial

Objective and Policies	Discussion
accommodate the shopping needs of residents and to provide increased employment opportunities within the community.	developments.
Objective 3 To improve the compatibility between commercial and residential uses.	Consistent. Commercial and residential uses are compatible with each other.
Objective 4 To encourage all new large scale commercial development to provide adequate parking and access to public transportation.	Consistent. The Project provides code required parking and is located near the Metro Red Line Westlake Station and bus lines.
Policy 1 That commercial facilities be located on existing traffic arteries and commercial corridors.	Consistent. The Project includes hotel and cultural center along Wilshire Boulevard, a major street.
Policy 2 That the pedestrian oriented commercial centers around MacArthur Park continue to serve as a focal point for shopping, social, and entertainment activities.	Not Applicable. The Project is not located at MacArthur Park.
Policy 3 That the neighborhood commercial areas along Temple Street, Beverly Boulevard, and Third Street continue to serve the everyday shopping needs of residents providing supermarkets, drugstores, retail shops, and other neighborhood oriented services.	Not Applicable. The Project is not located along Temple Street, Beverly Boulevard, and Third Street.
Policy 4 That neighborhood markets and retail and service establishments oriented to the residents be retained throughout the community, within walking distance of residents.	Not Applicable. The Project does not remove any existing markets and does not include proposed markets.
Policy 5 That Highway-Oriented commercial uses such as drive-thru establishments, auto-repair, and other similar uses be located away from pedestrian oriented areas.	Not Applicable. The Project does not include drive-thru establishments, auto-repair, and other similar uses.
Policy 6 That development of new high intensity uses activities be designed to emphasize service or employment of local residents.	Consistent. The Project includes a service-oriented hotel and cultural center that could serve as employment for local residents.
Policy 7 That new commercial development be oriented so as to facilitate pedestrian access by locating parking to the rear of structures.	Consistent. The Project pedestrian access is along Wilshire and the parking structure is accessed and developed in the rear of the Site
Policy 8 That adequate parking be provided for all types of retail and office commercial development, and that all parking areas adjacent to residential lands be appropriately buffered by a wall and/or landscaped setback.	Consistent. The Project provides code required parking in a parking structure buffered by the buildings around it.
<p>Source: Westlake Community Plan, http://cityplanning.lacity.org/complan/pdf/wlkcptxt.pdf</p> <p>Table: CAJA Environmental Services, August 2016.</p>	

**Table 3.10-4
Westlake Redevelopment Plan**

Objective	Discussion
Commercial	
1. To promote the economic well being of Westlake through the encouragement of the revitalization of viable commercial areas.	Consistent. The Project provides a mix of hotel, residential, parking, and cultural center uses that would strengthen viable commercial development and provide new services within existing commercial areas.
2. To rebuild appropriate new businesses where commercial facilities were damaged or destroyed and to promote new investment through new development.	Consistent. The Project will rehabilitate an existing historic commercial building and would also help to further activate Wilshire Boulevard.
3. To control street vending through establishment of off-street markets and/or the creation and enforcement of regulations.	Not Applicable. Street vending enforcement is under the jurisdiction of LAPD.
Safety	
4. To enhance the safety of residents, business owners, employees and visitors, and their property.	Consistent. The Project would remove a surface parking lot and increase the uses and activity at the Site, which could act as surveillance (eyes on the street principle) to reduce crime and ensure safety.
5. To encourage increased Los Angeles Police Department (LAPD) deployment including foot and bicycle patrols, and a police substation.	Not Applicable. LAPD deployment is a City policy and funding issue.
6. To establish neighborhood and business watch groups throughout the community.	Not Applicable. The Project is not required to develop a neighborhood or business watch group
7. To promote the integration of public and private security through cooperation of building owners and managers, institutions, LAPD, Metropolitan Transportation Authority (MTA), and others.	Consistent. The Project will coordinate with LAPD on building design and operations to reduce crime potential. The Project is not required to work with Metro to further reduce crime in the area.
Housing	
8. To make provisions for housing as is required to satisfy the needs and desires of the various age, income, and disabled groups of the community, maximizing the opportunity for individual choice.	Consistent. The Project proposes to add 478 units. The Project will provide 39 very-low income affordable housing units..
9. To encourage the preservation and enhancement of the varied and distinctive residential character of the community.	Not Applicable. The Project Site does not contain housing to be preserved.
10. To provide housing choices and to increase the supply and improve the quality of housing for all income and age groups, especially affordable housing including housing for very low-, low- and moderate-income large families and individuals. To eliminate overcrowding in individual units, and to provide home ownership opportunities, and other housing choices which meet the needs of the community.	Consistent. The Project proposes to add 478 units. The Project will provide 39 very-low income affordable housing units..

Objective	Discussion
11. To provide housing related services in the Project Area.	Consistent. The Project includes housing and related services at the Site.
12. To assure fair distribution of housing throughout the community, avoiding concentrations by status or income.	Consistent. The Project proposes to add 478 units. The Project will provide 39 very-low income affordable housing units.
13. To balance the affordable housing objective with that of the economic viability of private ownership.	Consistent. The Project proposes to add 478 units. The Project will provide 39 very-low income affordable housing units.
<p>Source: Westlake Redevelopment Plan, http://www.crala.org/internet-site/Projects/Westlake/upload/Westlake.pdf</p> <p>Table: CAJA Environmental Services, August 2016.</p>	

11. MINERAL RESOURCES

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.¹³⁹ MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.¹⁴⁰ Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not within a Methane Zone.¹⁴¹

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas. The nearest one is #10 LA City Oil Field, located near 3rd Street and Alameda Street.¹⁴² The California Department of Conservation has more detailed online mapping of wells. No oil wells exist on the Project Site.¹⁴³ Therefore, no impacts to mineral resources of regional or statewide significance will occur.

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

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future

¹³⁹ City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed April 11, 2016.

¹⁴⁰ City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed April 11, 2016.

¹⁴¹ ZIMAS search: <http://zimas.lacity.org/>.

¹⁴² City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: <http://cityplanning.lacity.org/cwd/gnlpln/saftevelt.pdf>, accessed April 11, 2016.

¹⁴³ California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: <http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>, April 11, 2016.

locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

12. NOISE

The section is based in part on the following item, included as Appendix I of this IS/MND:

I Noise Appendices, DKA Planning, July 2016.

- a) **Would the project result in 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. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 3.12-1 provides examples of A-weighted noise levels from common sources.

**Table 3.12-1
A-Weighted Decibel Scale**

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
<i>Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.</i>	

Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. when background ambient noise levels are higher. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because

CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.

- Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Small perceptible changes in sound levels for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level for a hard surface of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, an unobstructed visual path between noise source and receptor. Barriers such as walls or buildings that break line-of-sight between sources and receivers can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA or more. However, if barriers are not high or long enough to break line-of-sight from sources to receivers, their effectiveness can be greatly reduced.

Regulatory Setting

Federal

Federal noise standards do not regulate environmental noise associated with short-term construction or long-term operation of development projects.

State

The State of California's 2003 General Plan Guidelines establish county and city guidelines for acceptable exterior noise levels based on land use. These standards and criteria are incorporated into the land-use planning process to reduce future noise and land-use incompatibilities. Table 3.12-2 illustrates State guidelines on considering the compatibilities between various land uses and outdoor noise levels.

**Table 3.12-2
Land Use Compatibility for Community Noise Environments**

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
					CU			
Residential – Multi-Family	NA							
			CA					
					NU			
					CU			
Transient Lodging – Motels, Hotels	NA							
			CA					
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
			CA					
					NU			
							CU	
Auditoriums, Concert Halls, Amphitheaters	CA							
				CU				
Sports Arenas, Outdoor Spectator Sports	CA							
					CU			
Playgrounds, Neighborhood Parks	NA							
				NU				
						CU		
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
				NU				
								CU
Office Buildings, Business Commercial and Professional	NA							
				CA				
						NU		
Industrial, Manufacturing, Utilities, Agriculture	NA							
				CA				
						NU		

NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Noise Control, Department of Health Services.

City of Los Angeles

Construction Noise Standards

The City of Los Angeles Municipal Code (LAMC) contains the following regulations applicable to the Project's construction activities:

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be

subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

75 dBA 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;

75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

However, the LAMC notes that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said 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 41.40 of the LAMC prohibits construction activity from occurring between 9:00 p.m. and 7:00 a.m. Monday through Friday, and before 8 a.m. and after 6 p.m. on Saturday and national holidays.¹⁴⁴ Construction is prohibited on Sunday. This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempt from these standards.

The City released the L.A. CEQA Thresholds Guide in 2006 to provide further guidance determining the significance of noise impacts. According to the Guide, a project's construction noise levels would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than ten days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

¹⁴⁴ City of Los Angeles, *Municipal Code Chapter IV-Public Welfare (Section 41.40)*, 1984.

- Construction activities exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.¹⁴⁵

Additionally, a project would, under normal circumstances, have a significant impact on community noise levels if:

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories recommended by the land-use compatibility guidelines set forth in the State of California’s 2003 General Plan; or
- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.¹⁴⁶

Operation Noise Standards

LAMC Chapter XI, “Noise Regulation,” regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment use, or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, they do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but allowable noise levels are generally determined relative to existing ambient noise levels at affected locations. According to LAMC Chapter XI, ambient noise is “the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured,” and that “ambient noise shall be averaged over a period of at least 15 minutes...”¹⁴⁷ Table 3.12-3 summarizes minimum ambient noise levels for various land uses. In the event that ambient levels at a subject location are lower than that provided in the table, the level in the table shall be assumed.

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used.¹⁴⁸ The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

¹⁴⁵ City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.

¹⁴⁶ City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.

¹⁴⁷ City of Los Angeles, Municipal Code Chapter XI. Section 111.01.

¹⁴⁸ The City’s noise ordinance does not define the length of time over which an average noise level should be assessed. However, based on the noted reference to “60 consecutive minutes,” it is concluded that the one-hour L_{eq} metric should be used. Regarding the location at which the noise measurements should be taken, the LAMC states that “except when impractical, the microphone shall be located four to five feet above the ground and ten

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dBA.
- For repeated impulsive noise – reduce allowable noise level by 5 dBA.
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 a.m. and 10:00 p.m. – increase allowable noise level by 5 dBA.

Table 3.12-3
City Of Los Angeles Minimum Ambient Noise Levels

Zone	Allowable Average Noise Level (L _{eq})	
	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)
M2 and M3	65 dB(A)	65 dB(A)
<i>Source: City of Los Angeles Municipal Code, Section 111.03, 1982</i>		

Additionally, the LAMC states that a noise level increase of 5 dBA or more over the existing average ambient noise level at an adjacent property line is considered a noise violation.¹⁴⁹ This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas, and motor vehicles driven onsite. The LAMC also prohibits use of air conditioning, refrigeration, heating, pumping, or filtering equipment that increases ambient noise levels by 5 dBA or more.¹⁵⁰ It also limits noise increases from motor driven vehicles on private property to no more than 5 dBA at adjacent residential properties.¹⁵¹ Finally, between 10:00 p.m. and 7:00 a.m. the City prohibits the loading or unloading of vehicles, or use of dollies, carts, forklifts, or other wheeled equipment that causes any impulsive sound and/or raucous or unnecessary noise within 200 feet of any residential building.¹⁵²

The L.A. CEQA Thresholds Guide states that a project's operations would normally have a significant impact if:

feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."

¹⁴⁹ City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.04), 1986.

¹⁵⁰ City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.02), 1982.

¹⁵¹ Ibid.

¹⁵² City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.03), 1982.

- The Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the “normally unacceptable” or “clearly unacceptable” categories recommended by the land-use compatibility guidelines set forth in the State of California’s 2003 General Plan; or
- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.¹⁵³

Construction Noise Impacts

During demolition, construction, ground clearing, grading, structural, and other Project phases, noise-generating activities could occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m., and between 8 a.m. and 6 p.m. on Saturday in accordance with the LAMC. Table 3.12-4 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project Site include multi-family residential buildings, institutional land uses, and commercial land uses. Of these, there are a number of nearby sensitive receptors in the vicinity of the Project Site, including:

- MacArthur Park Apartments: a multi-family mixed-use residential complex located approximately 10 feet south of the Project Site.
- Los Angeles Medical Center: a medical facility located approximately 60 feet west of the Project Site.
- Wilshire Pointe Apartments: a multi-family mixed-use residential complex located approximately 90 feet north of the Project Site.
- People’s College of Law: a law school located approximately 60 feet east of the Project Site along Bonnie Brae Street.
- Mid-Wilshire Convalescent Hospital: a medical facility located approximately 60 feet east of the Project Site.

On August 8, 2016, DKA Planning took short-term, 15-minute noise readings at these receptors to ascertain their current ambient noise levels.¹⁵⁴ At all receptors, ambient noise levels were primarily a product of vehicular travel along Wilshire Boulevard, Westlake Avenue, and Bonnie Brae Street. As

¹⁵³ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page I.2-3.

¹⁵⁴ Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day’s measurements, and set at approximately five feet above the ground.

shown in Table 3.12-4, ambient noise levels ranged from 64.8 dBA L_{eq} at People's College of Law and Mid-Wilshire Convalescent Home to 73.1 dBA L_{eq} at Los Angeles Medical Center.

Construction activities would generate noise from a variety of on- and off-site activities and would include the use of on-site heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries. For this analysis, construction noise impacts were modeled using the noise reference levels of equipment to be operated during the Project's grading phase, specifically excavators and front-end loaders, as these vehicles typically operate in tandem. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA.¹⁵⁵ Other construction phases would not require equipment as loud as those required for site grading activities. Therefore, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction phases would not exceed those analyzed here.

Table 3.12-4
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
MacArthur Park Apartments	10	79.1	66.6	79.4	12.8
Los Angeles Medical Center	60	77.6	73.1	78.9	5.8
Wilshire Pointe Apartments	90	74.0	72.9	76.5	3.6
People's College of Law	60	77.6	64.8	77.8	13.0
Mid-Wilshire Convalescent Hospital	60	77.6	64.8	77.8	13.0

Source: DKA Planning, 2016.

Given the ambient conditions in the Project area and the proximity of receptors, significant noise impacts could occur at the following receptors during construction of the Project:

- MacArthur Park Apartments are projected to experience noise levels of 79.4 dBA, an increase of 12.8 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.
- Los Angeles Medical Center is projected to experience noise levels of 78.9 dBA, an increase of 5.8 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a

¹⁵⁵ Federal Highway Administration. *Construction Noise Handbook*, 2006.

significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

- People's College of Law is projected to experience noise levels of 77.8 dBA, an increase of 13.0 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.
- Mid-Wilshire Convalescent Hospital is projected to experience noise levels of 77.8 dBA, an increase of 13.0 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

Additionally, the Project's construction noise levels would exceed LAMC Sec.112.05's 75 dBA limit for powered construction equipment within 500 feet of residential zones. These on-site construction-related noise impacts would be considered significant but mitigable. **Mitigation Measures 12-1** through **12-5** are recommended to reduce incremental increases in noise levels and limit construction noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, haul trucks would export some 90,000 cubic yards of excavated soils from the Project site. Over the course of the Project's 3 month grading phase, anticipated to be the most intensive hauling phase, an average of 107 haul trips per day would transport cut soils from the Project site to Sunshine Canyon Landfill, accessing the US-101 North via Wilshire Boulevard and Alvarado Street. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land use. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let alone augment their traffic to levels capable of producing 5.0 dBA increases. As a result, Project haul trucks would produce negligible noise increases, and the Project's off-site construction noise impacts would be **less than significant**.

The Project would comply with the following requirements of the City:

Regulatory Compliance Measures

RCM-12-1 Demolition, Grading, and Construction Activities

- The project shall comply with the City of Los Angeles Noise Ordinance No. 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 Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Mitigation Measures

- MM-12-1** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- MM-12-2** All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.
- MM-12-3** All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.
- MM-12-4** Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.
- MM-12-5** At all Project boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound walls with acoustical blankets) shall be erected to obstruct line-of-sight noise travel from the Project site to all Project receptors.

Impacts After Mitigation

As shown in Table 3.12-5, implementation of **Mitigation Measures 12-1** through **12-5** would minimize ambient noise increases at all receptors to below the L.A. CEQA Thresholds Guide's 5 dBA threshold of significance for construction activities lasting more than 10 days in a three month period. These measures would also reduce construction noise to below the LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones. Given the Project's own height, some construction activities would occur at levels above the temporary sound barriers required by **Mitigation Measure 12-5**, thus negating their abilities to block line-of-sight noise travel from Project to receptors in these instances. However, construction activities at these heights would mainly utilize hand-held tools, pneumatic devices, and other smaller types of equipment that produce considerably less noise than heavy-duty construction vehicles that operate on the ground. As a result, these specific construction noise impacts would be less than significant.

**Table 3.12-5
Construction Noise Levels - Mitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
MacArthur Park Apartments	10	66.1	66.6	69.4	2.8
Los Angeles Medical Center	60	64.6	73.1	73.7	0.6
Wilshire Pointe Apartments	90	61.0	72.9	73.2	0.3
Bonnie Brae Street Residences	60	64.6	64.8	67.7	2.9
Mid-Wilshire Convalescent Hospital	60	64.6	64.8	67.7	2.9
<i>Source: DKA Planning, 2016.</i>					

Operational Phase Noise Impacts

During project operations, the development would produce direct noise impacts on the site from residential, restaurant, and commercial activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include:

Mechanical Equipment: Stationary noises associated with building operations, such as ground-level heating, ventilation, and air conditioning (HVAC) systems, would generate noise levels between 50 and 65 dBA at 50 feet.¹⁵⁶ Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. Based on the distance from the Project site to nearby receptors, ambient noise levels, intervening site features, and the relatively quiet operation of HVAC systems, these on-site noise sources would be incapable of causing the ambient noise levels of affected uses to increase by 3 dBA CNEL to or within their appropriate L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" land use compatibility categories, or by 5 dBA or greater overall.

Auto-Related Activities: Operations of the proposed parking garage would introduce recurrent, intermittent noise events, such as door slamming and vehicle engine start-ups. Of all Project receptors, MacArthur Park Apartments, particularly its residential units that directly face the Project site, would be most impacted by such noises. However, it is unlikely that noises related to the operations of the Project's parking garage would contribute to sustained 5 dBA increases in ambient noise at MacArthur Park Apartments or any more distant receptors. First, MacArthur Park Apartments is already exposed to auto-related noises from parking facilities, including the existing lot located at the Project site and the parking garage incorporated within MacArthur Park Apartments itself. Second, the predominant source of

¹⁵⁶ Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.

ambient noise at MacArthur Park Apartments is vehicular travel along Wilshire Boulevard. The Project's residential tower and parking garage would block the direct line-of-sight travel of this noise to MacArthur Park Apartments, likely providing a significant reduction in overall ambient noise levels for Project-facing units. Finally, according to the FTA, parking garages with a peak hourly activity of 1000 vehicles can produce a noise level of 56.4 dBA L_{eq} at a reference distance of 50 feet from the source's center.¹⁵⁷ A similar parking garage would not be capable of creating 5 dBA or greater noise impacts at MacArthur Park Apartments or any other Project receptor. Given the Project's maximum projected vehicle activity of only 273 trips per hour (during the P.M. peak hour), the proposed parking garage would have even lesser impacts on ambient noise levels.¹⁵⁸ While the characteristics of ambient noise experienced by MacArthur Park Apartments may change as a result of the Project's multi-story parking garage, sustained decibel level increases of 5 dBA or greater would not be expected.

Rooftop Stage: The proposed cultural center would include a stage and seating for entertainment events. As a matter of regulatory compliance with the LAMC, any musical instruments or amplified sounds would be prohibited from being audible at a distance of greater than 150 feet from the Project's property line and would be restricted from emitting volumes capable of raising ambient noise levels at adjacent residential receptors and other sensitive uses by greater than 5 dBA. However, given the high ambient noise levels of the Project area, the height of the rooftop stage, the center's wrap-around façade, and the presence of numerous multi-story buildings to obstruct sound's line-of-sight travel, it is doubtful that rooftop events would be capable of raising ambient noise levels at any Project receptors by greater than 5 dBA.

Rooftop Lounge/Dining: Given the height of the proposed cultural center and residential tower, it unlikely that noises such as conversation and voices from rooftop lounge or dining areas would be audible at any Project receptors. And as previously discussed, any amplified noises, such as ambient music, would be prohibited from being audible at a distance of greater than 150 feet from the Project's property line and would be restricted from emitting volumes capable of raising ambient noise levels at adjacent residential receptors and other sensitive uses by greater than 5 dBA.

Landscape Maintenance: Lawnmowers and leaf blowers generate about 70 dBA at 5 feet of distance from the source. Because sound levels decrease by 6 dBA or more for each doubling of distance from a point noise source, these temporary activities would cause short-term increases in noise that would not result in sustained increases in ambient noise levels of 5 dBA or more. The Project would comply with LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), which applies to lawn mowers, backpack blowers, small lawn and garden tools and riding tractors

Residential Land Uses: Noise from recurrent activities (e.g., conversation, consumer electronics) or non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noise.

¹⁵⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

¹⁵⁸ Gibson Transportation Consulting, Inc.; *Traffic Study for the 1930 Wilshire Boulevard Project*; July 2016.

These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be considered less than significant. The majority of the Project's operational noise impacts would be from indirect noise impacts associated with its 1,355 net new daily vehicle trips.¹⁵⁹ The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled with FHWA TNM 2.5, comparing an existing year (2016) no project scenario to existing year (2016) with project scenarios.

As shown in Table 3.12-6, the greatest project-related noise increase would be 0.1 dBA, occurring at multiple segments of Alvarado Street during both A.M. and P.M. peak hours. This increase in ambient noise levels would be far below thresholds of audibility and would not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA CNEL to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. As a result, these inaudible, off-site vehicular noise impacts would be considered less than significant. Operational noise impacts would be less than significant, and no mitigation measures are required.

Table 3.12-6
Estimated Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2016)	With Project (2016)	Project Change	Significant Impact?
N/B Alvarado St., south of 3 rd St.	AM	71.1	71.2	0.1	No
	PM	72.0	72.0	0.0	No
S/B Alvarado St., south of 3 rd St.	AM	71.2	71.3	0.1	No
	PM	71.4	71.4	0.0	No
N/B Alvarado St., south of 6 th St.	AM	70.3	70.3	0.0	No
	PM	71.0	71.0	0.0	No
S/B Alvarado St., south of 6 th St.	AM	70.4	70.5	0.1	No
	PM	70.8	70.9	0.1	No
E/B Wilshire Blvd., west of Bonnie Brae St.	AM	70.5	70.5	0.0	No
	PM	70.0	70.0	0.0	No
W/B Wilshire Blvd., west of Bonnie Brae St.	AM	70.2	70.3	0.1	No
	PM	70.1	70.1	0.0	No

Source: DKA Planning, 2016.

¹⁵⁹ *Traffic Study, Gibson Transportation Consulting, July 2016.*

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

Vibration Definitions

Peak particle velocity (PPV) is defined as the maximum instantaneous peak of a vibration signal; it is usually measured in inches per second. PPV can be used to describe vibration impacts to buildings and humans.¹⁶⁰

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.¹⁶¹ Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

Federal

The Federal Transit Administration has established guidelines that provide significant thresholds for ground-borne vibration disrupting various land uses. For operating rooms and medium-powered optical

¹⁶⁰ California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*, September 2013.

¹⁶¹ California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*, September 2013.

and/or imaging equipment, the FTA suggests a maximum vibration level of 72 VdB.¹⁶² Though this level of vibration is not detectable by humans (feelable), it has the potential to interfere with some types equipment.

State

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when considering the impacts construction-related vibrations. Table 3.12-7 summarizes Caltrans' vibration thresholds for building and structural damage.

City

The City of Los Angeles has not adopted any thresholds associated with building damage or land use disruption caused by ground-borne vibration.

**Table 3.12-7
Building Damage Vibration Thresholds**

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
<i>Source: California Department of Transportation, 2013.</i>		

Construction Vibration Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. As a result of drilling operations, vibration velocities of up to 0.223 inches per second PPV are projected to occur at the nearest off-site structures, MacArthur Park Apartments. However, this vibration intensity is below the 0.5 inches per second PPV threshold that is considered potentially harmful to new residential structures. As shown in Table 3.12-8, more distant receptors would experience even lower peak vibration velocities. Given that other construction equipment and activities would produce less vibration and have reduced

¹⁶² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

impacts on nearby receptors, construction-related structural vibration impacts would be considered less than significant.

Table 3.12-8
Vibration Velocities at Off-Site Sensitive Uses from Project Construction

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
MacArthur Park Apartments	10	0.223	0.5	No
Los Angeles Medical Center	60	0.037	0.5	No
Wilshire Pointe Apartments	90	0.025	0.3	No
People's College of Law	60	0.037	0.5	No
Mid-Wilshire Convalescent Hospital	60	0.037	0.5	No
<i>Source: DKA Planning 2016.</i>				

In terms of land-use interference, drilling activities could have significant impacts at Los Angeles Medical Center and Mid-Wilshire Convalescent Hospital. As shown in Table 3.12-9, these receptors are projected to experience maximum ground-borne vibration levels of 75.6 VdB. This would exceed the FTA's recommended 72 VdB maximum vibration level for operating rooms and the types of imaging equipment that could be used at these medical facilities. However, this threshold is primarily intended to apply to long-term operational vibration from transit projects, not from temporary events such as construction activities. While the same thresholds are applied to construction activities when analyzing the potential impacts of vibration producing activities, exceeding them on temporary, short-term timescales is not necessarily cause for significance, as it would be for long-term operation vibration impacts. For instance, onsite drilling activities beyond a distance of 80 feet from these receptors would have an impact less than 72 VdB. Thus, only a limited fraction of the Project's drilling activities would be capable of creating vibration levels above 72 VdB at these receptors, and these levels would only occur at the edges of these medical centers, not at locations or rooms located at a further distance from the Project Site. Furthermore, it is important to consider that these receptors already likely experience regular vibration events of greater than 72 VdB from bus pass-bys along Westlake Avenue, Wilshire Boulevard, and Bonnie Brae Street. According to the FTA, buses can produce vibrations of up to 75 VdB at distances between 10 and 20 feet.¹⁶³ Because of this, the lower levels of Los Angeles Medical Center and Mid-Wilshire Convalescent Hospital, those that would be most susceptible to Project-related vibration, most likely are currently exposed to long-term vibration events of a roughly equal intensity, but far greater frequency, than Project drilling would generate. Given this, the Project's land-use interference impacts would be considered less than significant.

Table 3.12-9
Land Use Interference Vibration Levels (Unmitigated)

Off-Site Receptor – Land Use	Distance to Project Site (ft.)	Estimated VdB	Significant?
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¹⁶³ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

Table 3.12-9
Land Use Interference Vibration Levels (Unmitigated)

Off-Site Receptor – Land Use	Distance to Project Site (ft.)	Estimated VdB	Significant?
Los Angeles Medical Center	60	75.6	No
Mid-Wilshire Convalescent Hospital	60	75.6	No
<i>Source: DKA Planning 2016.</i>			

The Project could also generate vibration from the hauling of cut and demolished materials. This could increase vibration levels at receptors along haul route roadways. However, the proposed haul route accesses the US-101 North via Wilshire Boulevard and Alvarado Street, major arterials with high existing levels of traffic and few roadside sensitive land uses. Any annoyance to residential or other sensitive land uses along these routes would be temporary and minor, especially given the Project's projected peak deployment of approximately 107 haul trips per day. As a result, the Project's off-site construction vibration impacts would be less than significant.

Operational Vibration Impacts

During operation of the Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby land uses and other sensitive receptors during long-term operations to vibration levels far below levels associated with land-use disruption and would be less than significant.

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

Less Than Significant Impact. The majority of any long-term noise impacts would come from traffic traveling to and from the Project Site. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's incremental contribution to permanent off-site ambient noise levels along local roads would be minimal. As shown in Table 3.12-10, off-site noise generated by Project-related traffic would be negligible in both the AM and PM peak hours, respectively, when compared to year 2020 projected traffic volumes. Given that this additional traffic would not contribute to off-site ambient noise increases of greater than 0.1 dBA L_{eq} , the Project's individual and cumulative mobile source noise impacts would be considered less than significant.

Table 3.12-10
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2020)	With Project (2020)	Project Change	Significant Impact?
N/B Alvarado St., south of 3 rd St.	AM	71.6	71.6	0.0	No
	PM	72.3	72.3	0.0	No
S/B Alvarado St., south of 3 rd St.	AM	71.7	71.7	0.0	No
	PM	71.8	71.8	0.0	No
N/B Alvarado St., south of 6 th St.	AM	70.8	70.8	0.0	No
	PM	71.4	71.4	0.0	No
S/B Alvarado St., south of 6 th St.	AM	70.9	71.0	0.1	No
	PM	71.3	71.2	-0.1†	No
E/B Wilshire Blvd., west of Bonnie Brae St.	AM	71.7	71.7	0.0	No
	PM	71.2	71.2	0.0	No
W/B Wilshire Blvd., west of Bonnie Brae St.	AM	71.2	71.3	0.1	No
	PM	71.5	71.5	0.0	No
†Some street segments will experience a net reduction of traffic as a result of the Project, contributing to possible minor decreases in ambient noise levels at these locations. However, any decreases in noise would be imperceptible. Source: DKA Planning, 2016.					

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

Less Than Significant Impact with Mitigation Incorporated. As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors, particularly at residences near the Project Site. Moreover, any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. However, the related projects are located further than the sensitive receptors analyzed above, and intervening urban uses break the line of sight. The related projects would also be subject to regulatory compliance and possible mitigation measures to reduce noise. In addition, given the relatively high ambient noise levels of the Project area, it is unlikely that construction noise from concurrent developments would be audible at Project receptors, let alone contribute to cumulatively considerable noise increases. Persistent traffic noise from Wilshire Boulevard would largely mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would obstruct these sounds' line-of-sight travel. Nevertheless, Project construction itself would have significant but mitigatable noise impacts.

With regard to off-site construction noise from haul trucks, the Project itself would have less than significant impacts. Given the Project's location with direct access along Wilshire Boulevard to Alvarado to the US-101 freeway, its haul route would not be expected to intersect with haul routes of other projects along roadways with numerous roadside sensitive receptors. As a result, any cumulative off-site haul truck noise impacts would be less than significant.

Mitigation Measures 12-1 through **12-5** would reduce the Project's noise impacts from on-Site construction activity. With these mitigation measures in place, the Project's construction noise impacts would be less than significant.

- e) **For a proposed 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 proposed project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project is not located within the vicinity (i.e., five miles) of any public airport. The Project would not expose people to excessive noise levels related to the operation of a public airport. Therefore, the Project would not result in an impact related to public airport noise levels.

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

No Impact. The Project is not located within the vicinity (i.e., five miles) of any private airstrip. As a result, the Project would not expose any people to excessive noise levels associated with any private airstrip activities. Therefore, the Project would not result in an impact related to private airstrip noise levels.

13. POPULATION AND HOUSING

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

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

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

Population generation is shown in Table 3.13-1 and employee generation is shown in Table 3.13-2. This is a conservative estimate as it does not take into account the residential bedroom mix of up to 120 studio units, 240 1-bedroom units, and 118 2-bedroom units. It is estimated that the Project would have approximately 1,343 residents and 283 employees. However, there would be a net loss of 177 employees with removal of existing uses.

**Table 3.13-1
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
Residential	478 DU	2.81 person / DU	1,343
Proposed Population			1,343
<p><i>Note: DU = dwelling unit</i></p> <p><i>Source: The 2010 Census shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf</i></p> <p><i>Table: CAJA Environmental Services, June 2016.</i></p>			

**Table 3.13-2
Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees
Office (to be removed)	30,000 sf	1 employee / 209 sf	(144)
Medical Office (to be removed)	74,000 sf	1 employee / 234 sf	(316)
Hotel (88,000 sf) -Includes the hotel-affiliated restaurant and bar	220 rooms	1 employee / 882 sf	100
Cultural Center - Restaurant (including banquet, café, and kitchen spaces)	18,726 sf	3 employees / 1,000 sf	56
Cultural Center - Offices (including school office and auditorium office)	19,632 sf	1 employee / 209 sf	93
Theater	850 seats	30 employees / theater	30
Classrooms	50 students	1 employee / 13 students	4
Proposed Employees			-177
<p><i>Note: sf = square feet</i> <i>Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11:</i> <i>Office is Standard Commercial Office rate.</i> <i>Medical Office is Medical Offices rate</i> <i>Hotel is Lodging rate. Hotel Rooms: average room is 300 to 400 square feet.</i> http://www.dimensionsinfo.com/hotel-room-size/. <i>This analysis assumes 400 square feet per room. The lodging area is approximately 88,000 sf.</i> <i>Theater and Restaurant is based on RCLCO assumptions from the NoHo West EIR (Case No ENV-2015-888-EIR).</i> <i>Classroom is based on ratio of teachers to students for private schools.</i> http://nces.ed.gov/fastfacts/display.asp?id=28. <i>Cultural Center has no specific rate. Using a representative rate of Office.</i> <i>Table: CAJA Environmental Services, June 2016.</i></p>			

The October 2016 unemployment rate in the Los Angeles-Long Beach-Glendale area is approximately 5.1 percent.¹⁶⁴ Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs. Rather the jobs could be filled by workers already counted within the Los Angeles area. The Project would have approximately 1,343 residents and a net decrease of 177 employees. The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase as compared to existing levels. The Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Thus, it does not represent a substantial or significant growth as compared to the existing

¹⁶⁴ Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.

characteristics. The potential to induce substantial growth may be indicated by the introduction of a project in an undeveloped area or the extension of major infrastructure.¹⁶⁵ The Project does not include introduction in an undeveloped area or the extension of major infrastructure (such as roadways, bridges, infrastructure). The Project would result in no direct impact to population and housing and a less than significant impact to employee growth.

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the community plan and citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

Table 3.13-3 Population and Households in the City of Los Angeles, lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2035.

Table 3.13-4 shows the Southern California Association of Government's (SCAG) planned growth of the City of Los Angeles in population, housing, and employment from 2014 to 2035.¹⁶⁶

Table 3.13-5, Population and Households in the Westlake Community Plan Area, provides data from the WLA CP, adopted in 1999, and the more recent 2014 Growth and Infrastructure Report.

**Table 3.13-3
Population and Households in the City of Los Angeles**

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2016	4,030,904	1,453,271	2.77
2035	4,442,500	1,618,900	2.74
Change 2010 to 2016			
Number Changed	+238,283	+41,265	+0.08
Change 2016 to 2035			
Number Changed	+411,596	+165,629	-0.03
2010: Census data, reported 4/1/2010. 2016: As of January 1, 2016, Department of Finance: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php . 2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf . Table: CAJA Environmental Services, July 2016.			

¹⁶⁵ LA City CEQA Thresholds Guide, page J.1-3.

¹⁶⁶ The 2014 data was from a May 2015 report and profile. The 2035 projection was from the 2016 RTP adopted April 2016.

Table 3.13-4
SCAG Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2014	3,904,657	1,432,553	1,753,559
2035	4,442,500	1,618,900	2,104,100
Change (2014-2035)	+537,843	+186,347	+350,541
2014: SCAG Local Profile for City of Los Angeles, dated May 2015: http://www.scag.ca.gov/Documents/LosAngeles.pdf 2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf . Table: CAJA Environmental Services, July 2016.			

Table 3.13-5
Population and Housing Units in the Westlake Community Plan Area

	2010 (Projection)	2010 Census	2014 Estimate	Change 2010-2014
Population	121,987	110,781	116,296	+5,515
Housing Units	38,860	40,847	41,501	+654
2010 Projection from 1999: West Los Angeles Community Plan, http://cityplanning.lacity.org/complan/pdf/wlacptxt.pdf . This has been superseded by 2010 Census data. 2010 Census: Census data, reported 4/1/2010. 2014 Estimate: City Planning Dept, Demographics Research Unit, Population/Housing Estimate, July 1, 2014. Table: CAJA Environmental Services, July 2016.				

Housing Element

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.¹⁶⁷ The Housing Element provides the Regional Housing Needs Assessment (RHNA) allocation, which is the number of housing units that each community must plan for and accommodate during the 8-year period. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing

¹⁶⁷ City of Los Angeles, Housing Element, 2013-2021:
<http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>.

Element does not have any material effect on development patterns, nor specify areas for increased height or density.¹⁶⁸

The Housing Element has identified 1,853 sites (500 acres) in the Westlake Community Plan Area as having housing capacity for 39,506 net units.¹⁶⁹ The Project Site does not currently provide housing but will add 478 housing units. The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.¹⁷⁰ Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area.

Infrastructure Impacts

The Project Site is developed with a commercial building and is located within an urbanized area. There is adequate infrastructure such as roads and utilities. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by existing infrastructure such as roadways. Impacts will be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

¹⁶⁸ City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>.

¹⁶⁹ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.

¹⁷⁰ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

14. PUBLIC SERVICES

This section is based on the following letters, included as Appendix J of this IS/MND:

J-1 Los Angeles Unified School Districts response, October 10, 2016.

J-2 Los Angeles Department of Recreation and Parks response, May 16, 2016.

J-3 Los Angeles Public Library response, June 25, 2016.

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

i) Fire protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.¹⁷¹ Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between commercial land use and a LAFD station that houses an engine company¹⁷² is 1.0 mile and a station that houses a truck company¹⁷³ is 1.5 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.¹⁷⁴ The Project Site is served by several fire stations, as shown in Table 3.14-1, Fire Stations.

¹⁷¹ http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

¹⁷² LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: <http://lafd.org/about/apparatus>.

¹⁷³ LAFD: Aerial Ladder Fire Engines: <http://lafd.org/about/apparatus>.

¹⁷⁴ http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.

**Table 3.14-1
Fire Stations**

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
11	1819 W. 7 th Street	450 feet	Paramedic Ambulance Rescue Ambulance Assessment Light Force Assessment Engine	Non-EMS: 4:26 min EMS: 4:32 min	Non-EMS: 925 EMS: 4,278
13	2401 W. Pico Boulevard	1.3 miles	Engine Paramedic Ambulance EMS Battalion Captain	Non-EMS: 5:03 min EMS: 4:53 min	Non-EMS: 490 EMS: 2,554
3	108 N. Fremont Avenue	1.8 miles	Task Force Paramedic Ambulance Rescue Ambulance Emergency Lighting Unit Command Post Vehicle Medical Supply Trailer Urban Search and Rescue	Non-EMS: 4:04 min EMS: 5:11 min	Non-EMS: 685 EMS: 2,395

Incident counts: year 2016 (January to June). Non-EMS is fire emergency. EMS is emergency medical service.

Response Time: year 2016 (January to June) average time (turnout time + travel time) in the station area.

Response time listed above does not include call processing, which averages 1:02 minutes citywide in 2016. Call processing is done at a central location and does not differ by fire stations.

Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS2 unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their PPE3 and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.

Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.

Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.

http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf

Task Force: Truck company and two fire engines.

LAFD April 2016 Fire Station Directory.

Table: CAJA Environmental Services, July 2016.

Response Distance

The Project Site is located within the response distance specified by Table 507.3.3 of the 2014 Fire Code. Station No. 11 is within 1 mile away and contains an Assessment Light Force (truck company and engine company)¹⁷⁵ and additional engine and ambulance, respectively. Additionally, the Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response

¹⁷⁵ LAFD: <http://www.lafd.org/about/about-lafd/apparatus>.

distance of a fire station with adequate equipment. There are an additional fire stations located nearby. Therefore, impacts related to response distance will be less than significant.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The routes from the fire stations to the Project Site would likely pass through several of the 14 study intersections. The future traffic conditions with the Project show that none of the 14 study intersections would have a significant impact.¹⁷⁶

Division 118 of the Fire Code requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) to include a fire control station containing a public address system and telephones for LAFD use. The fire control station must contain a fire detection and fire alarm system, an elevator recall switch and status panel for all elevator cars, a sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stair shaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and status indicators for fire pumps and water supply. A sound-powered telephone communication system must be located at every floor level in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Section 57.118.05), a dependable method of sounding a fire alarm throughout the building (Section 57.118.06), an emergency smoke control system (Section 57.118.07), a standby and emergency power system (Section 57.118.08), stair shaft doors for fire department use (Section 57.118.09), pressurized stair shafts (Section 57.118.10), and other devices operable from the fire control station, as previously listed.

Division 118 also requires the installation of automatic sprinkler systems in all new high-rise buildings in addition to a rooftop emergency helicopter landing facility (EHLF) on each high-rise building in a location approved by the Chief of the LAFD (Section 57.4705.4). However, if specific life safety features are provided as outlined in LAFD Requirement No. 10, the EHLF is not required.¹⁷⁷ Such life safety measures include; providing an additional Fire Service Access Elevator in addition to the number of elevators required in the CBC; two (2) stairways (and a third if added) shall have roof access; enclosed elevator lobbies; escalator openings or stairways that are not part of the means of egress system and connect more than two stories protected by approved power-operated automatic shutters at every penetrated floor; automatic sprinkler systems; and a Video Camera Surveillance System with cameras located in all Firefighter Elevator Vestibules and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft.

¹⁷⁶ *Traffic Study*, Gibson Transportation Consulting, July 2016.

¹⁷⁷ http://www.lafd.org/sites/default/files/pdf_files/EHLF-Reg10.pdf

For high-rise buildings, LAMC Section 57.33.19 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan is required to designate at each building a Fire Safety Director, Floor Wardens, Private First Responders, and Essential Building Personnel. Among other tasks, these individuals would be required to call 911 during an emergency incident; report to the building's Emergency Assistance Center; direct evacuation operations; report conditions to the LAFD; conduct monthly inspections; know the location of all exits; direct emergency evacuations and fire drills; and assist the LAFD, emergency responders, and on-site personnel during emergency evacuations. A description of the procedures all occupants should follow in an emergency evacuation or drill is also required in the Emergency Plan. The Emergency Plan also designates appropriate evacuation signs and requires the Fire Safety Director to establish the on-site Emergency Assistance Center. Lastly, LAMC Section 57.33.19 requires that mandatory fire drills be conducted at least once annually. A Fire Safety Officer is required to be present to witness and document the total building evacuation. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access will be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire flow is set at 6,000 to 9,000 gpm. The following fire hydrants are the nearest to the Project Site:¹⁷⁸

- Hydrant (ID 15468, size 4D, 8-inch main) on west side of Bonnie Brae Street, 218 feet south of Wilshire Boulevard.
- Hydrant (ID 7190, size 4D, 12-inch main) on southwest corner of Wilshire Boulevard and Bonnie Brae Street.
- Hydrant (ID 15271, size 4D, 12-inch main) on northwest corner of Wilshire Boulevard and Bonnie Brae Street.

¹⁷⁸ *Navigate LA, Fire Hydrants Layer: <http://navigatela.lacity.org/navigatela/>.*

- Hydrant (ID 16771, size 4D, 8-inch main) on east side of Westlake Avenue, 233 feet south of Wilshire Boulevard.

Upgrades to the hydrants and system will be evaluated at the plan check phase. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient as is standard practice. If it is not, then upgrades to the existing infrastructure may be required. No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, the Project will comply with the required Regulatory Compliance Measures listed below. These measures allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Regulatory Compliance Measures

RCM-14-1 Fire Flows and Hydrants

The Project shall submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then onsite or offsite upgrades to the existing infrastructure, as determined by the LADWP and LAFD shall be required by the applicant.

RCM-14-2 Public Services (Fire)

The Project shall comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit.

ii) Police protection?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, Northeast, and Rampart.¹⁷⁹ The Rampart Community Police Station, located at 1401 West 6th Street, is approximately 2,400 feet driving distance from the Project Site. The Pacific Community is 5.54 square

¹⁷⁹ LAPD, Central Bureau: http://www.lapdonline.org/central_bureau.

miles in size and includes Echo Park, MacArthur Park, and Rampart Victorian Homes, has approximately 165,000 residents, and has approximate 330 sworn officers.¹⁸⁰

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call.

Crime Rate

Crime statistics (Part 1 violent and property crimes) are shown in Table 3.14-2, Crime Statistics. The crime rate, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the LAPD to some extent.

**Table 3.14-2
Crime Statistics**

Type of Crime	Rampart	Citywide
Homicide	11	142
Rape	51	901
Robbery	331	5,398
Aggravated Assault	408	8,215
Burglary	205	8,115
Motor Vehicle Theft	376	9,653
Burglary Theft from Vehicle	604	16,322
Personal/Other Theft	593	16,733
Total (Part 1 Crimes)	2,579	65,479

¹⁸⁰ LAPD: http://www.lapdonline.org/rampart_community_police_station.

**Table 3.14-2
Crime Statistics**

Type of Crime	Rampart	Citywide
<i>Year-to-date: July 16, 2016</i> <i>Rampart: http://assets.lapdonline.org/assets/pdf/rmpprof.pdf</i> <i>Citywide: http://assets.lapdonline.org/assets/pdf/cityprof.pdf</i> <i>Table: CAJA Environmental Services, July 2016.</i>		

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. The Project Site is generally open on the Wilshire Boulevard, Westlake Avenue, and Bonnie Brae Street sides. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Mitigation Measure 14-1**). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This measure would reduce potential construction impacts on police protection services to less than significant.

Operational Impacts

The Project is seeking a Conditional Use Permit for alcohol (CUB). Some CUBs require Standardized Training for Alcohol Retailers (STAR Training). If the Project's CUB requires such training, then all employees involved with the sale of alcoholic beverages shall enroll in the LAPD STAR Training.

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours due to the residential and hotel uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and hotel patrons, and visitors. The potential for crime can be reduced with site-specific designs and features (see **Mitigation Measure 14-2**). The Project will include standard security measures such as adequate security lighting, secure key access to hotel rooms, and front desk that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade facility as part of the buildings. The LAPD will require that the commanding officer of the Rampart Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. This is formally included as **Mitigation Measure 14-3**. The Project will not require the construction of a new or expanded police station. **Mitigation Measures 14-1** through **14-3** will reduce the impacts associated with police services to less than significant.

Mitigation Measures

MM-14-1 Public Services (Police – Demolition/Construction Sites)

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

MM-14-2 Public Services (Police)

The plans shall incorporate a design that enhances the security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

MM-14-3 Upon completion of the Project, the Rampart Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

iii) Schools?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:¹⁸¹

- MacArthur Park Avenue Elementary (K-5), located at 2300 West 7th Street.¹⁸²
- John H. Liechty Middle (6-8), located at 650 South Union Avenue.¹⁸³
- Belmont School Choice Area (9-12):
 - Miguel Contreras Learning Complex, located at 322 Lucas Avenue
 - Academic Leadership Community.¹⁸⁴

¹⁸¹ LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>.

¹⁸² http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=2544.

¹⁸³ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8058.

- School of Business and Tourism.¹⁸⁵
- School of Social Justice.¹⁸⁶
- LA School of Global Studies.¹⁸⁷
- Ramon C. Cortines School of Visual and Performing Arts, located at 450 North Grand Avenue.¹⁸⁸
- Belmont High, located at 1575 2nd Street.¹⁸⁹
- Edward R. Roybal High, located at 1200 West Colton Street.¹⁹⁰

Enrollment Capacities

Each of the schools' enrollments and capacities are shown in Table 3.14-3. There are no anticipated new schools planned for the area.

**Table 3.14-3
LAUSD Schools Enrollments and Capacities**

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ Shortage ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ Shortage ⁸	Overcrowding Future? ⁹
MacArthur Park Avenue Elementary	560	579	542	(19)	Yes	504	709	(205)	Yes
Liechty Middle	1,066	1,226	1,081	(160)	Yes	991	1,253	(262)	Yes
Belmont School Choice (listed below):	6,230	5,708	5,656	522	No	5,856	4,833	1,023	No
Contreras Academic Leadership	433	-	476	-	-	407	-	-	-
Belmont High LA Teacher Prep	253		207			238			
Cortines School of Visual and Performing	1,782		1,567			1,675			

¹⁸⁴ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8207.

¹⁸⁵ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8517.

¹⁸⁶ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8527.

¹⁸⁷ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8774.

¹⁸⁸ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8516.

¹⁸⁹ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8543.

¹⁹⁰ http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8544.

**Table 3.14-3
LAUSD Schools Enrollments and Capacities**

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ (Shortage) ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ (Shortage) ⁸	Overcrowding Future? ⁹
Contreras School of Business and Tourism	435		458			409			
Contreras School of Social Justice	463		514			435			
Belmont High	1,033		930			971			
Roybal High	1,412		1,122			1,327			
Contreras School of Global Studies	419		382			394			

Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2015-2016. Current and projected data are updated annually and become available after May 1st of each calendar.

¹ School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

² The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

³ The number of students actually attending the school now, including magnet students.

⁴ Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

⁵ Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist:

-A school is currently on a multi-track calendar.

-There is currently a seating shortage.

-There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats.

⁶ School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity for magnet programs.

⁷ Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

⁸ Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment).

⁹ Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:

-A school remains on a multi-track calendar.

-There is a seating shortage in the future.

-There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

^Current capacity shown for QEIA (Quality Education Investment Act) schools includes class-size reduction due to QEIA. Excludes capacity used by charter co-locations. Projected capacity excludes class-size reduction due to QEIA.

Source: Written response from Rena Perez, LAUSD, October 10, 2016. Included in the Appendices.

Table by CAJA Environmental Services, November 2016.

Enrollment Generation

As shown on Table 3.14-4, the Project (directly through the residential use and indirectly through its employees) would generate an increase of approximately 234 elementary, 59 middle, and 118 high school students, for a total increase of approximately 411 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

**Table 3.14-4
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential units	478	191	48	96	335
Employees	283	43	11	22	76
Total		234	59	118	411
<i>Residential land uses: Elementary: 0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household</i> <i>Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used.</i> <i>Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.</i> <i>Table: CAJA Environmental Services, July 2016.</i>					

Proximity to Schools

The Project Site is in proximity to the following schools:¹⁹¹

- Camino Nuevo Charter Academy, located at 697 S Burlington Avenue, 200 feet south
- Esperanza Elementary School, located at 680 Little Street, 625 feet southeast
- Liechty Middle School, located at 650 S Union Avenue, 1,250 feet southeast
- MacArthur Park Primary Center School, located at 2300 W 7th Street, 1,300 feet west

The Project will have a less than significant impact during construction (with regulatory compliance measures for asbestos, lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that adaptive reuse of existing structures does not emit hazardous materials. The schools would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site. In addition, the potential construction impacts will be mitigated to a less than significant level by **Mitigation Measure 14-4**.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy

¹⁹¹ LAUSD and Google Maps.

of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.

Regulatory Compliance Measure

RCM-14-3 Payment of School Development Fee

Prior to issuance of a building permit, the Project Applicant shall pay all applicable school facility development fees in accordance with California Government Code Section 65995.

Mitigation Measures

MM-14-4 Public Services (Construction Activity Near Schools)

The developer shall maintain ongoing contact with administrators of Camino Nuevo Charter Academy, Esperanza Elementary School, and Liechty Middle School. The administrators shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from LAUSD's Transportation Branch (323) 342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school are maintained. The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

iv) Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community

parks of 4.0 (or 4 acres per 1,000 persons). The Westlake Community Plan Area has a ratio of 0.37 acres or parkland per 1,000 persons.¹⁹²

Table 3.14-5, Parks and Recreation Centers lists the parks and recreation centers that are located nearby the Project Site. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site.¹⁹³

**Table 3.14-5
Parks and Recreation Centers**

Name	Address	Acres
Pocket Park (less than one acre and with one-half mile radius of the Site)		
Hope and Peace Park	843 South Bonnie Brae Street	0.57
Rockwood Community Parks	1571 West Rockwood Street	0.43
Valencia Triangle	8 th and Valencia Street	0.06
Neighborhood Park (between one and 10 acres and with one mile radius of the Site)		
Echo Park Deep Pool	1419 West Cotton Street	2.07
Lake Street Park	227 North Lake Street	1.52
Vista Hermosa Soccer Fields	1301 West 1 st Street	1.88
Community Park (between 10 and 50 acres and with two mile radius of the Site)		
Echo Park	751 North Echo Park Boulevard	28.41
MacArthur Park	2230 West 6 th Street	29.87
<i>NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm Source: LADRP response, May 16, 2016. Included in the Appendices. Table: CAJA Environmental Services, July 2016. </i>		

The Project would increase the number of residents and employees at the Project Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include open space, a pool, community room and courtyard, and private open space and decks. The amount of open space required is 50,750 square feet, and approximately 62,497 square feet of open space will be provided, which exceeds the required amount. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities. However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

¹⁹² Los Angeles Recreation and Parks Department response, May 16, 2016.

¹⁹³ Los Angeles Recreation and Parks Department response, May 16, 2016.

According to the standards provided in the Public Recreation Plan, the 1,343 net new residents would require 5.37 acres to maintain the standard of four acres per 1,000 people. The City requires developers to dedicate parkland or pay applicable fees (such as dwelling unit construction tax) in lieu of parkland dedication. Therefore, with payment of fees per the following regulatory compliance measure, impacts to parks and recreation centers from the Project would be less than significant.

Regulatory Compliance Measure

RCM-14-4 Recreation (Increased Demand for Parks or Recreational Facilities)

If the applicant seeks a certificate of occupancy for apartments, then the following applies: (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

v) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.¹⁹⁴ On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. Table 3.14-6 describes the libraries that would serve the Project.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies

¹⁹⁴ LAPL website: <http://www.lapl.org/about-lapl/press/2012-library-facts>.

have shown reduce demand at physical library locations^{195,196,197} Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Table 3.14-6
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Central Library	630 West 5 th Street	538,000	2.6 million / 1.2 million	3,792,662	390
Chinatown	639 North Hill Street	14,500	74,709 / 238,872	28,839	13.5
Echo Park	1410 West Temple Street	17,543	43,908 / 111,188	52,661	9.0
Edendale	2011 West Sunset Boulevard	12,500	45,466 / 154,974	39,772	9.0
De Neve	2820 West 6 th Street	9,273	34,538 / 119,340	85,581	9.0
Little Tokyo	203 South Los Angeles Street	12,500	66,634 / 143,317	48,889	10.0
Pico Union	1030 South Alvarado Street	12,500	46,562 / 140,640	34,339	10.5
Pio Pico Koreatown	694 South Oxford Avenue	20,000	77,712 / 253,807	83,534	10.5

Staffing is full-time equivalent. Current Service – 2010 Census.
The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.
Source: Written response from LAPL, June 25, 2016. Included in the Appendices.
Table: CAJA Environmental Services, July 2016.

¹⁹⁵ “To Read or Not To Read”, see pg. 10: “Literary reading declined significantly in a period of rising Internet use”: <http://www.nea.gov/research/toread.pdf>.

¹⁹⁶ “How and Why Are Libraries Changing?” Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

¹⁹⁷ “Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies”, Carol Tenopir: <http://www.clir.org/pubs/reports/pub120/contents.html>.

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?**

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents and employees at the Project Site. Employees and hotel patrons do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under Section 14.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees, identified as a regulatory compliance measure, will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees (identified as a regulatory compliance measure) will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

16. TRANSPORTATION/TRAFFIC

This section is based on the following report and letters, included as Appendix K of this IS/MND:

K-1 Traffic Study, Gibson Transportation Consulting, July 2016.

K-2 Approval Letter, LADOT, August 9, 2016.

- a) **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for 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. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Intersection Analysis Methodology

The scope of intersection analysis for this study was developed in consultation with LADOT. The base assumptions and technical methodologies (i.e., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a Memorandum of Understanding (MOU) dated June 2, 2016, which was reviewed and approved by LADOT. This study analyzes the potential Project-generated traffic impacts on the street system in the vicinity of the Project Site as compared to existing conditions and projected future conditions at the time the Project is expected to be completed (Year 2020). Potential intersection impacts were evaluated for typical weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak periods. A total of 14 signalized intersections in the vicinity of the Project Site were selected with LADOT for detailed traffic analysis. They are listed in below and shown in Table 2 of the Traffic Study by Gibson Transportation Consulting, dated July 2016, and included as Appendix K. All the intersections are under the jurisdiction of the City of Los Angeles.

1. Rampart Boulevard and 6th Street
2. Rampart Boulevard and Wilshire Boulevard
3. Alvarado Street and 3rd Street
4. Alvarado Street and 6th Street
5. Alvarado Street and Wilshire Boulevard
6. Alvarado Street and 7th Street
7. Alvarado Street and Olympic Boulevard

8. Westlake Avenue and 6th Street
9. Westlake Avenue and Wilshire Boulevard
10. Westlake Avenue and 7th Street
11. Bonnie Brae Street and 6th Street
12. Bonnie Brae Street and Wilshire Boulevard
13. Bonnie Brae Street and 7th Street
14. Beaudry Avenue and Wilshire Boulevard

This Traffic Study evaluated the potential for impacts caused by the Project on the street system surrounding the Project Site. The Project's Study Area is generally bounded by 3rd Street to the north, SR 110 to the east, Olympic Boulevard to the south, and Rampart Boulevard to the west. Consistent with Traffic Study Policies and Procedures (LADOT, August 2014), the following traffic conditions were developed and analyzed as part of this study:

Existing Conditions (Year 2016) – The analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions. The Existing Conditions analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Traffic Study Area (Study Area). Intersection turning movement counts were collected in May 2016 and represent Existing Conditions. Fieldwork (lane configurations and signal phasing) for the analyzed intersections was also collected in May 2016. Intersection lane configurations are provided in Appendix B, traffic count worksheets in Appendix C, and level of service worksheets in Appendix D of the Traffic Study in Appendix K of this IS/MND.

Existing with Project Conditions (Year 2016) – This analysis condition projects the potential intersection operating conditions that could be expected if the Project were built under Existing Conditions. This analysis evaluates the potential Project-related traffic impacts as compared to Existing Conditions.

Future without Project Conditions (Year 2020) – This analysis projects the future traffic growth and intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by Year 2020. The Future without Project Conditions are projected by adding ambient traffic growth and traffic from related projects to Existing Conditions. This analysis provides the conditions by which the Project impacts are evaluated in the future at full buildout.

Future with Project Conditions (Year 2020) – This analysis projects the potential intersection operating conditions that could be expected if the Project were built in the projected buildout year. This analysis identifies the potential incremental impacts of the Project at full buildout, prior to mitigation, on projected future traffic operating conditions by adding the Project-generated traffic to the Future without Project traffic forecasts.

Signalized Intersection Analysis Methodology

Intersection capacity has been analyzed using the “Critical Movement Analysis (CMA) – Planning” (Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980) methodology in accordance with the Traffic Study Policies and Procedures. The CMA methodology was implemented using LADOT’s Calcadb Lite spreadsheet application to analyze intersection operating conditions. The methodology calculates the volume-to-capacity (V/C) ratio, which is used to determine the intersection level of service (LOS) according to the LOS definitions provided in Table 3.16-1.

Table 3.16-1
Level of Service Definitions for Intersections

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	> 0.60 – 0.70	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 0.70 – 0.80	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 0.80 – 0.90	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.
E	> 0.90 – 1.00	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.00	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.
<i>Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980.</i> <i>Source: Table 1, Traffic Study, Gibson Transportation Consulting, July 2016</i> <i>Table by CAJA Environmental Services, July 2016.</i>		

The significance of the potential impacts of Project generated traffic at the signalized study intersections was determined using criteria identified in Traffic Study Policies and Procedures. LADOT guidelines indicate that a project is considered to have a significant traffic impact on a signalized intersection if the increase in the V/C ratio attributable to the project exceeds a specific threshold depending on the final intersection LOS. LADOT has developed a sliding scale methodology in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the V/C ratio of the intersection increases, as shown in Table 3.16-2. The relative impact of the added traffic volumes to be generated by the Project was evaluated based on analysis of existing and future operating conditions at the study intersections, with and without the Project.

Table 3.16-2
Significant Impact Criteria, City of Los Angeles

Intersection Conditions with Project Traffic		Significant Impact Threshold for Project-related Increase in V/C Ratio
LOS	V/C	

C	0.701 – 0.800	Equal to or greater than 0.040
D	0.801 – 0.900	Equal to or greater than 0.020
E and F	> 0.901	Equal to or greater than 0.010

Source: City of Los Angeles.

Table by CAJA Environmental Services, July 2016.

Street Segments

As outlined in Traffic Study Policies and Procedures, a local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes as shown in Table 3.16-3.

Table 3.16-3
Street Segment Thresholds

Projected ADT with Project (Final ADT)	Project-related Increase in ADT
0 to 999	120 trips or more
1,000 to 1,999	12% or more of Final ADT
2,000 to 2,999	10% or more of Final ADT
3,000 or more	8% or more of Final ADT

Source: City of Los Angeles.

Table by CAJA Environmental Services, July 2016.

Traffic Signal Automation

The Automated Traffic Surveillance and Control (ATSAC) system represents an advanced system in computer control of traffic signals. It was first put into operation in June 1984 in the Coliseum area of the City to anticipate the expected increase in traffic due to the Summer Olympic Games, and has since been expanded to other parts of the City. The advantages of ATSAC-controlled traffic signals are substantial, including real-time adjustment of signal timing plans to reflect changing traffic conditions, identification of unusual traffic conditions caused by incidents, the ability to implement special purpose short-term signal timing changes in response to incidents, and the ability to identify signal equipment malfunctions quickly. LADOT estimates that implementation of this system improves intersection capacity by an average of 7%.

In addition to ATSAC, the Adaptive Traffic Control System (ATCS) has been implemented in the City. ATCS is a computer-based traffic signal control program that provides fully responsive traffic signal control based on real-time traffic conditions. It automatically adjusts and optimizes traffic signal timing in response to current traffic demands on the entire signal network such that the number of stops and the amount of delay is minimized along with improved traffic signal coordination throughout the network. LADOT estimates that implementation of this system improves intersection capacity by an additional 3%.

over those operating under the ATSAC system alone. Each of the signalized study intersections is equipped with both ATSAC and ATCS. In accordance with standard LADOT procedures, a capacity increase of 10% (0.10 V/C adjustment) was applied to each intersection to reflect the benefits of ATSAC and ATCS control. The capacity increases are applied within the Calcadb Lite software and, therefore, are inherent in the analysis results.

Additional Traffic Analyses

Caltrans Facilities

California Department of Transportation (Caltrans) facilities were evaluated according to the guidelines found in First Amendment to the Agreement Between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures (December 15, 2015) (the “Caltrans Agreement”). The Caltrans Agreement identifies a series of screening criteria that, if any are met by the Project, require a more detailed analysis of Caltrans facilities. As detailed in the MOU provided in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices, the Project did not meet the screening thresholds and, therefore, no detailed analysis of Caltrans facilities was required. Nonetheless, a supplemental Caltrans analysis was conducted, in accordance with Guide for Preparation of Traffic Impact Studies (Caltrans, December 2002), and is provided in Appendix E (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices).

Congestion Management Program

An analysis also was conducted according to 2010 Los Angeles County Congestion Management Program (Metro, 2010) (CMP) guidelines. The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed (1) for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and (2) all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. In addition, it requires a review of potential impacts to the regional transit system.

Existing Conditions

A comprehensive data collection effort was undertaken to develop a detailed description of existing conditions in the Project Study Area. The Existing Conditions analysis includes an assessment of the existing freeway and street systems, an analysis of traffic volumes and current operating conditions, and an assessment of the existing public transit service, as well as pedestrian and bicycle circulation.

The Project’s Study Area is generally bounded by 3rd Street to the north, SR 110 to the east, Olympic Boulevard to the south, and Rampart Boulevard to the west. A traffic analysis study area generally comprises all intersections that have potential to experience significant traffic impacts from project traffic as defined by the City’s impact criteria. The Project Study Area was established in consultation with the

City, taking into consideration the Project's peak hour trip generation estimates, the anticipated distribution of Project traffic, and the existing operation of nearby intersections and corridors. A total of 14 signalized intersections were identified during the MOU process for detailed analysis.

Existing Street System

The existing street system in the Study Area consists of a regional roadway system including Avenues, Collectors and Local Streets that provide sub-regional or local access and circulation within the Study Area. These transportation facilities generally provide two to six travel lanes and usually allow parking on either side of the street. Typically, the speed limits range between 25 and 45 miles per hour (mph). There are no freeways (higher-volume limited-access roadways with speed limits of 65 mph) within the Study Area. Street classifications are designated in Mobility Plan 2035: An Element of the General Plan (Los Angeles Department of City Planning, January 2016). The available facilities in the Study Area are defined by the following:

- Freeways are high-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Avenues are arterial streets that serve through traffic, as well as provide access to major commercial activity centers. Avenues are divided into three categories:
 - Avenue I typically provides 70 feet of paved width within 100 feet of right-of-way.
 - Avenue II typically provides 56 feet of paved width within 86 feet of right-of-way.
 - Avenue III typically provides 46 feet of paved width within 72 feet of right-of-way.
- Collector Streets are intended to assist local traffic flow to Avenues and are typically located at quarter-mile intervals in a grid system.
- Local Streets provide circulation for local adjacent neighborhoods and do not typically serve commercial uses. Local streets provide connections to collector streets, which in turn, connect to the arterial street network.

The Mobility Plan is currently in litigation that could potentially result in its nullification. In that scenario, the previous plan would once more be in effect. City of Los Angeles Transportation Element of the General Plan (Los Angeles Department of City Planning, 1999) designates the following Arterial Streets rather than the Avenues designated in the Mobility Plan:

- Arterial Streets are major streets that serve through traffic, as well as provide access to major commercial activity centers. Arterials are divided into three categories:
 - Major Highway Class I provides up to four travel lanes in each direction and serves ADT of more than 50,000.

- Major Highway Class II provides three travel lanes in each direction and serves ADT of 30,000 to 50,000. These arterials are typically located one mile apart in a grid system.
- Secondary Highway provides two travel lanes in each direction and serves ADT of 20,000 to 30,000. These arterials supplement major highways and are typically located one mile apart midway between major highways.

The following is a brief description of the major roadways in the Study Area, including their classifications under both the Mobility Plan and 1999 Transportation Element:

3rd Street – 3rd Street is a designated Avenue II in the Mobility Plan, and previously a designated Secondary Highway in the General Plan. It travels in the northwest-southeast direction and is located north of the Project Site. It generally provides four travel lanes, two in each direction, with left-turn lanes at intersections. One-hour unmetered parking and two-hour metered parking is generally available on both sides of the street between Rampart Boulevard and Alvarado Street. Unmetered parking with morning peak hour restrictions is generally available on the south side of the street between Westlake Avenue and Witmer Street. One-hour unmetered parking is generally available on both sides of the street between Witmer Street and Lucas Avenue. 10-minute metered parking is generally available east of Bixel Street.

6th Street – 6th Street is a designated Avenue II in the Mobility Plan, and previously a designated Secondary Highway in the General Plan. It travels in the northwest-southeast direction and is located north of the Project Site. It provides four travel lanes, two in each direction, with left-turn lanes at intersections. One-hour metered parking with peak hour restrictions is generally available on both sides of the street between Rampart Boulevard and Park View Street. One-hour metered parking with peak hour restrictions is generally available on the north side of the street between Park View Street and West Lake Avenue. One-hour metered parking with peak hour restrictions is generally available on both sides of the street between Bonnie Brae Street and Valencia Street.

Wilshire Boulevard – Wilshire Boulevard is a designated Avenue I west of Alvarado Street and Avenue II east of Alvarado Street in the Mobility Plan, and previously a designated Major Highway Class II in the General Plan. It travels in the northwest-southeast direction and is located along the northern boundary of the Project Site. It provides four travel lanes and two bus lanes, two travel lanes and one bus lane in each direction, with left-turn lanes at intersections between Rampart Boulevard and Park View Street. It provides four travel lanes, two lanes in each direction, with left-turn lanes at intersections east of Park View Street. One- and four-hour metered parking with peak hour restrictions is generally available on both sides of the street between Rampart Boulevard and Valencia Street. One-hour metered parking is generally available on both sides of the street east of Valencia Street.

7th Street – 7th Street is a designated Avenue II in the Mobility Plan, and previously a designated Secondary Highway in the General Plan. It travels in the northwest-southeast direction and is located south of the Project Site. It generally provides two travel lanes, one lane in each direction, with left-turn lanes at intersections. One-hour metered parking is generally available on both sides of the street within the Study Area.

Olympic Boulevard – Olympic Boulevard is a designated Boulevard II in the Mobility Plan, and previously a designated Major Highway Class II in the General Plan. It travels in the northwest-southeast direction and is located south of the Project Site. It generally provides six travel lanes, three lanes in each direction, with left-turn lanes at intersections. Unmetered and two-hour metered parking with peak hour restrictions is generally available on both sides of the street within the Study Area.

Rampart Boulevard – Rampart Boulevard is a designated Avenue I north of 6th Street and a designated Collector Street south of 6th Street, and previously a designated Secondary Highway in the General Plan. It travels in the northeast-southwest direction and is located west of the Project Site. It provides four travel lanes, two in each direction, with left-turn lanes at intersections between 3rd Street and 6th Street. It provides two travel lanes, one in each direction between 6th Street and Hoover Street. One-hour unmetered parking and unlimited parking is generally available on both sides of the street within the Study Area.

Alvarado Street – Alvarado Street is a designated Avenue II in the Mobility Plan, and was previously a designated Major Highway Class II in the General Plan. It travels in the northeast-southwest direction and is located west of the Project Site. It generally provides six travel lanes, three lanes in each direction. One-hour and two-hour metered parking is generally available on both sides of the street with morning peak hour restrictions on the west side of the street and afternoon peak hour restrictions on the east side of the street within the Study Area.

Westlake Avenue – Westlake Avenue is a designated Local Street in the Mobility Plan and the General Plan. It travels in the northeast-southwest direction and is located along the western boundary of the Project Site. It provides two travel lanes, one lane in each direction. One-hour unmetered parking and one-hour and two-hour metered parking is generally available on both sides of the street between 3rd Street and 7th Street. Unlimited parking and two-hour unmetered parking is generally available on both sides of the street between 7th Street and Olympic Boulevard.

Bonnie Brae Street – Bonnie Brae Street is a designated Local Street in the Mobility Plan, and was previously a designated Collector Street north of 6th Street and a designated Local Street south of 6th Street in the General Plan. It travels in the northeast-southwest direction and is located along the eastern boundary of the Project Site. It generally provides two travel lanes, one lane in each direction. Unlimited parking is generally available on both sides of the street within the Study Area. Four-hour metered parking is available on both sides of the street between Wilshire Boulevard and 7th Street.

Beaudry Avenue – Beaudry Avenue is a designated Avenue II in the Mobility Plan, and was previously a designated Major Highway Class II in the General Plan. It travels in the northeast-southwest direction and is located east of the Project Site. It generally provides three to four travel lanes, one or two lanes in each direction. Four-hour metered parking is generally available on the west side of the street between 5th Street and 6th Street.

Existing Traffic Volumes And Levels Of Service

This section presents the existing peak hour turning movement traffic volumes for the intersections analyzed in the study, describes the methodology used to assess the traffic conditions at each intersection, and analyzes the resulting operating conditions at each intersection indicating V/C ratios or delay and LOS.

Existing Traffic Volumes

Intersection turning movement counts were conducted at the 14 study intersections during the weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak periods in May 2016. Local schools were in session when the traffic counts were conducted. The existing intersection peak hour traffic volumes are illustrated in Table 5 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices).

Existing Intersection Levels of Service

Table 3.16-4 summarizes the weekday morning and afternoon peak hour LOS results for each of the study intersections under Existing Conditions, accounting for the 10% credit to reflect ATSAC and ATCS control. It indicates that all 14 study intersections currently operate at LOS D or better during both the morning and afternoon peak hours.

Table 3.16-4
Existing Conditions (Year 2016) Significant Impact Analysis

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
1	Rampart Blvd. and 6 th St.	AM	0.615	B
		PM	0.770	C
2	Rampart Blvd. and Wilshire Blvd.	AM	0.603	B
		PM	0.605	B
3	Alvarado St. and 3 rd	AM	0.636	B
		PM	0.673	B
4	Alvarado St. and 6 th St.	AM	0.493	A
		PM	0.525	A
5	Alvarado St. and Wilshire Blvd.	AM	0.551	A
		PM	0.545	A
6	Alvarado St. and 7 th St.	AM	0.438	A
		PM	0.479	A
7	Alvarado St. and Olympic Blvd.	AM	0.724	C
		PM	0.803	D
8	Westlake Ave. and 6 th St.	AM	0.332	A
		PM	0.439	A
9	Westlake Ave. and Wilshire Blvd.	AM	0.407	A
		PM	0.457	A
10	Westlake Ave. and 7 th St.	AM	0.302	A
		PM	0.443	A

11	Bonnie Brae St. and 6 th St.	AM	0.425	A
		PM	0.473	A
12	Bonnie Brae St. and Wilshire Blvd.	AM	0.425	A
		PM	0.489	A
13	Bonnie Brae St. and 7 th St.	AM	0.351	A
		PM	0.479	A
14	Beaudry Ave. and Wilshire Blvd.	AM	0.515	A
		PM	0.367	A
Source: Table 5, <u>Traffic Study</u> , Gibson Transportation Consulting, July 2016. Table by CAJA Environmental Services, July 2016.				

Future without Project Conditions

Estimates of future traffic conditions both with and without the Project, representing cumulative conditions, were developed to evaluate the potential impacts of the Project on the local street system. This discussion details the assumptions used to develop the Future without Project Conditions in Year 2020, which corresponds to the anticipated Project buildout year. The existing traffic volumes were factored by an annual ambient growth rate to approximate regional growth and development. In addition to the ambient growth, for purposes of providing a conservative analysis of potential cumulative traffic impacts, the traffic generated by proposed, approved, and under construction projects in and around the Study Area was also added to estimate the Future without Project Conditions.

The forecast of Future without Project Conditions was prepared in accordance with procedures outlined in Section 15130 of Guidelines for Implementation of the California Environmental Quality Act, Chapter 3, Title 14, California Code of Regulations (California Natural Resources Agency, amended July 27, 2007). Specifically, two options are provided for developing the cumulative traffic volume forecast: “(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the [lead] agency, or “(B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.”

As described in detail below, this analysis includes traffic growth both from related present and future development projects that are proposed, approved, or under construction (Related Projects) in accordance with option “A” above and from regional growth projections (i.e., ambient growth) in accordance with option “B” above. Given that the ambient growth factor discussed below likely includes some traffic growth resulting from the Related Projects, the traffic analysis provides a highly conservative estimate of Future without Project traffic volumes.

Ambient Traffic Growth

Traffic levels are expected to increase over time as a result of regional growth and development in and around the Study Area. Based on discussions with LADOT through the MOU process, an ambient growth factor of 1% per year compounded annually was used to adjust the existing traffic volumes to reflect the effects of the regional growth and development by Year 2020. The total adjustment applied over the four-year period was 4.06%. This growth factor accounts for increases in traffic due to potential projects not yet proposed or projects outside the Study Area.

Related Projects

In accordance with the CEQA requirements in Guidelines, this study also considered the effects of the Project in relation to the Related Projects. The list of Related Projects is based on information provided by the Department of City Planning and LADOT, as well as recent studies of projects in the area. The Related Projects are detailed in Table 6 and shown in Figure 5 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices). Though the buildout years of many of these Related Projects are uncertain and may be well beyond the buildout year of the Project, and notwithstanding that some may never be approved or developed, they were all considered as part of this traffic study and conservatively assumed to be completed by the Project buildout Year 2020. The development of estimated traffic volumes added to the Study Area as a result of Related Projects involves the use of a three-step process: trip generation, trip distribution, and trip assignment.

Trip Generation

Trip generation estimates for the Related Projects were provided by LADOT or were calculated using a combination of previous study findings and the trip generation rates contained in Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012). Table 6 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices) summarizes the Related Project trip generation for typical weekdays, including daily trips, morning peak hour trips, and afternoon peak hour trips. These projections are very conservative in that they do not in every case account for either the trips generated by the existing uses to be removed or the likely use of other travel modes (transit, bicycle, walk, etc.) Further, they do not fully account for the internal capture trips within a multi-use development, nor the interaction of trips between multiple Related Projects within the Westlake/downtown area, in which one Related Project serves as the origin for a trip destined for another Related Project.

Trip Distribution

The geographic distribution of the traffic generated by the Related Projects is dependent on several factors. These include the type and density of the proposed land uses, the geographic distribution of the population from which the employees/residents and potential patrons of the proposed developments are drawn, and the location of these projects in relation to the surrounding street system. These factors are considered along with logical travel routes through the street system to develop a reasonable pattern of trip distribution.

Trip Assignment

The trip generation estimates for the Related Projects were assigned to the local street system using the trip distribution pattern described above. Table 6 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices) shows the peak hour traffic volumes associated with these Related Projects at the study intersections. These volumes were then added to the existing traffic volumes after adjustment for ambient growth through the projected buildout year of 2020. As discussed above, this is a conservative approach as many of the Related Projects may be reflected in the ambient growth rate. These volumes represent the Future without Project Conditions (i.e., existing traffic volumes added to ambient traffic growth and Related Project traffic growth) and are shown in Table 7 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices) for the 14 study intersections.

Future Improvements

The roadway network for the Future without Project Conditions within the Study Area could also be affected by regional improvement plans, local specific plans, and programmed improvements. However, upon consultation with LADOT, it was determined that the analysis should conservatively exclude potential improvements within the Study Area because of uncertainty as to the likelihood and timing of their implementation. Therefore, the lane configurations and signal phasing at the study intersections was assumed to remain unchanged between Existing and Future Conditions. However, the potential improvements that were identified are discussed below.

2010 Bicycle Plan

2010 Bicycle Plan identifies the City's vision for a more integrated bicycle network throughout the City, including within the Study Area. It proposes new bicycle lanes on 6th Street and Alvarado Street within the Study Area. It also proposes amenities to create bicycle-friendly streets within the Study Area on Bonnie Brae Street. Bicycle-friendly streets are neighborhood streets that use signage, pavement markings, and other approaches to facilitate bicycle usage without affecting vehicular capacity. Upon consultation with LADOT's bicycle section, no changes to vehicular lane configurations as a result of potential new bicycle lanes were assumed in this analysis.

Mobility Plan

In the Mobility Plan, the City identifies key corridors as components of various "mobility-enhanced networks." Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified and there is no schedule for implementation; therefore, no changes to vehicular lane configurations were made as a result of the Mobility Plan. However, the following mobility-enhanced networks included corridors within the Study Area:

- Transit Enhanced Network: 3rd Street and Alvarado Street were identified as Moderate Plus Transit Enhanced Streets and Wilshire Boulevard was identified as a Comprehensive Transit-Enhanced Street.

- Neighborhood Enhanced Network: 6th Street and Bonnie Brae Street were identified as part of the Neighborhood Enhanced Network.
- Bicycle Enhanced Network / Bicycle Lane Network / Protected Bicycle Facilities Network: Rampart Boulevard, Alvarado Street and 7th Street were identified for Planned Bicycle Lanes.
- Vehicle Enhanced Network: Olympic Boulevard was identified as part of a Vehicle Enhanced Network.
- Pedestrian Segment Analysis: The following corridors were identified as part of the Pedestrian Analysis:
 - 3rd Street
 - 6th Street
 - Wilshire Boulevard
 - 7th Street
 - Olympic Boulevard
 - Rampart Boulevard
 - Alvarado Street

Future Without Project Intersection Levels Of Service

Table 3.16-5 summarizes the weekday morning and afternoon peak hour LOS results for each of the 14 study intersections under Future without Project Conditions. It indicates that 13 of the 14 study intersections are projected to operate at LOS D or better during both the weekday morning and afternoon peak hours. The remaining intersection of Alvarado Street & Olympic Boulevard (Intersection #7) is projected to operate at LOS C during the morning peak hour and LOS E during the afternoon peak hour.

**Table 3.16-5
Future Without Project Conditions (Year 2020) Significant Impact Analysis**

No.	Intersection	Peak Hour	Future Without	
			V/C	LOS
1	Rampart Blvd. and 6 th St.	AM	0.691	B
		PM	0.847	D
2	Rampart Blvd. and Wilshire Blvd.	AM	0.751	C
		PM	0.764	C
3	Alvarado St. and 3 rd St.	AM	0.696	B
		PM	0.744	C
4	Alvarado St. and 6 th St.	AM	0.565	A

		PM	0.605	B
5	Alvarado St. and Wilshire Blvd.	AM	0.718	C
		PM	0.713	C
6	Alvarado St. and 7th St.	AM	0.473	A
		PM	0.561	A
7	Alvarado St. and Olympic Blvd.	AM	0.792	C
		PM	0.902	E
8	Westlake Ave. and 6 th St.	AM	0.388	A
		PM	0.511	A
9	Westlake Ave. and Wilshire Blvd.	AM	0.558	A
		PM	0.613	B
10	Westlake Ave. and 7 th St.	AM	0.320	A
		PM	0.502	A
11	Bonnie Brae St. and 6 th St.	AM	0.493	A
		PM	0.562	A
12	Bonnie Brae St. and Wilshire Blvd.	AM	0.575	A
		PM	0.645	B
13	Bonnie Brae St. and 7 th St.	AM	0.369	A
		PM	0.530	A
14	Beaudry Ave. and Wilshire Blvd.	AM	0.654	B
		PM	0.431	A
Source: Table 7, <i>Traffic Study</i> , Gibson Transportation Consulting, July 2016. Table by CAJA Environmental Services, July 2016.				

Project Trip Generation

The number of trips expected to be generated by the Project was estimated using rates published in Trip Generation, 9th Edition. These rates are based on surveys of similar land uses at sites around the country and are provided as both daily rates and morning and afternoon peak hour rates. They relate the number of vehicle trips traveling to and from the Project Site to the size of development of each land use. Appropriate trip generation reductions to account for public transit usage, pass-by trips, and trips shared between the Project land uses were made in consultation with LADOT. The Project is adjacent to the Metro Red Line / Purple Line Westlake/MacArthur Park Station; therefore a 25% adjustment was made to Project trips, in accordance with Traffic Study Policies and Procedures. The trip generation for the theater component of the cultural center was also reduced by 10% based on Trip Generation Handbook, 3rd Edition (Institute of Transportation Engineers, 2014) and Traffic Study Policies and Procedures methodologies to account for trips made by drivers already passing by the Project Site and stopping on their way to another destination. A 10% internal capture reduction was also applied to the trip generation for the apartment and hotel to account for person trips made between the different uses of the Project without using an off-site road system.

Additionally, the Project trip generation estimates were reduced to account for the trips that are currently generated by the Project Site, which will cease when the existing land uses are removed prior to Project construction. A 25% transit credit was also applied to the existing office/medical office building.

As shown in Table 3.16-6, after accounting for the adjustments above, the Project is expected to generate 1,355 net new trips on a typical weekday, including 85 morning peak hour trips (-44 inbound, 128 outbound) and 61 afternoon peak hour trips (103 inbound, -41 outbound).

Project Trip Distribution

Similar to the trip distribution of traffic for the Related Projects, the geographic distribution of trips generated by the Project is dependent on the location of residential and commercial centers from which employees and patrons of the Project would be drawn, characteristics of the street system serving the Project Site, the location of the proposed driveway, and existing traffic conditions. Based on these considerations, traffic entering and exiting the Project was assigned to the surrounding street system.

The intersection-level trip distribution pattern for the residential component of the Project at the study intersections is shown in Figure 16A (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices). Generally, the pattern is as follows:

- 25% to/from the north (Alvarado Street)
- 20% to/from the south (Alvarado Street)
- 40% to/from the east (6th Street, Wilshire Boulevard, 7th Street)
- 15% to/from the west (6th Street, Wilshire Boulevard)

The intersection-level trip distribution pattern for the hotel component of the Project at the study intersections is shown in Figure 16B (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices). Generally, the pattern is as follows:

- 30% to/from the north (Alvarado Street)
- 20% to/from the south (Alvarado Street)
- 30% to/from the east (6th Street, Wilshire Boulevard, 7th Street)
- 20% to/from the west (6th Street, Wilshire Boulevard)

The intersection-level trip distribution pattern for the cultural center component of the Project at the study intersections is shown in Figure 16C (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices). Generally, the pattern is as follows:

- 25% to/from the north (Alvarado Street)

- 25% to/from the south (Alvarado Street)
- 25% to/from the east (6th Street, Wilshire Boulevard, 7th Street)
- 25% to/from the west (6th Street, Wilshire Boulevard)

Project Trip Assignment

The Project trip generation estimates and the trip distribution patterns were used to assign the Project-generated traffic through the study intersections. Figure 9 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices) illustrates the Project-only traffic volumes at the study intersections during typical weekday morning and afternoon peak hours.

**Table 3.16-6
Project Trip Generation**

Description	ITE Land Use	Rate	Daily Traffic	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Apartment	220	Per du	6.65	20%	80%	0.51	65%	35%	0.62
Hotel	310	Per room	8.17	59%	41%	0.53	51%	49%	0.60
Live Theater	441	Per seat	N/A	N/A	N/A	0.00	50%	50%	0.02
Classroom	534	Per student	N/A	N/A	N/A	0.00	47%	53%	0.60
Office Building	710	Per 1,000 sf	11.03	88%	12%	1.56	17%	83%	1.49
Medical Office Building	720	Per 1,000 sf	36.13	79%	21%	2.39	28%	72%	3.57
Proposed Project									
Apartment	220	478 du	3,179	49	195	244	192	104	296
Transit/Walk-in Reduction		-25%	(795)	(12)	(49)	(61)	(48)	(26)	(74)
Mixed-Use Internal Capture		-10%	(238)	(3)	(19)	(22)	(48)	(24)	(72)
Subtotal			2,146	34	127	161	96	54	150
Theater	441	850 seats	N/A	N/A	N/A	N/A	9	8	17
Transit/Walk-in Reduction		-25%	N/A	N/A	N/A	N/A	(2)	(2)	(4)
Pass-by Reduction		-10%	N/A	N/A	N/A	N/A	(1)	(1)	(1)
Subtotal			N/A	N/A	N/A	N/A	6	5	11
Classroom	534	50 students	65	N/A	N/A	N/A	14	16	30
Transit-Walk-in Reduction		-25%	(16)	N/A	N/A	N/A	(4)	94)	(8)
Subtotal			48	N/A	N/A	N/A	11	12	23
Hotel	310	220 rooms	1,797	69	48	117	67	65	132
Transit/Walk-in Reduction		-25%	(449)	(17)	(12)	(29)	(17)	(16)	(33)
Mixed-Use Internal Capture		-10%	(135)	(5)	(4)	(9)	(5)	(5)	(10)
Subtotal			1,213	47	32	79	45	44	89
Total Proposed			3,407	81	159	240	158	115	273
Existing to be removed									
Office Building	710	30,000 sf	331	41	6	47	8	37	45
Transit/Walk-in Reduction		-25%	(83)	(10)	(1)	(12)	(2)	(9)	(11)

Subtotal			248	31	5	35	6	28	34
Medical Office Building	720	74,000 sf	2,674	140	37	177	74	190	264
Transit/Walk-in Reduction		-25%	(669)	(35)	(9)	(44)	(19)	(48)	(66)
Pass-by Reduction		-10%	(201)	(11)	(2)	(13)	(6)	(14)	(20)
Subtotal			1,804	94	26	120	49	128	178
Total Existing			2,052	125	31	155	55	156	212
Total Net New Project Trips			1,355	(44)	128	85	103	(41)	61

du: Dwelling Unit

ksf: 1,000 square feet

Source: Trip Generation, 9th Edition, Institute of Transportation Engineers, 2012.

Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

Per LADOT Traffic Impact Report Guidelines, live theater and medical office building projects receive 10% pass-by credit in the peak hours.

Per LADOT Traffic Impact Report Guidelines, projects within 1/4 mile of a Metro Rail station receive a 25% transit, walk-in reduction.

Mixed Use Internal Capture credit was estimated based on the NCHRP 8-51 Internal Trip Capture Estimation Tool.

Table 8, *Traffic Study*, Gibson Transportation Consulting, July 2016.

Table: CAJA Environmental Services, July 2016.

Existing with Project Conditions

This chapter describes the results of the analysis of intersection operating conditions associated with the Project when compared to Existing Conditions. The Existing Conditions are defined by the existing traffic volumes, roadways, and intersection configurations. The Existing with Project Conditions reflect Existing Conditions with the addition of Project traffic.

The Project-only weekday morning and afternoon peak hour traffic volumes were added to the Existing Conditions weekday morning and afternoon peak hour traffic volumes. The resulting volumes are illustrated in Table 9 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices). They represent Existing with Project Conditions after development of the Project under Existing Conditions.

Table 3.16-7 summarizes the results of the Existing with Project Conditions during the weekday morning and afternoon peak hours. As shown, all 14 study intersections would continue to operate at LOS D or better during all of the analyzed peak hours under Existing with Project Conditions. When measuring the Existing with Project Conditions against Existing Conditions, the incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 14 study intersections. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 14 study intersections under Existing with Project Conditions, and no mitigation measures are required.

**Table 3.16-6
Existing + Project Conditions (Year 2016) Significant Impact Analysis**

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact
			V/C	LOS	V/C	LOS	Change	
1	Rampart Blvd. and 6 th St.	AM	0.615	B	0.618	B	+ 0.003	No
		PM	0.770	C	0.771	C	+ 0.001	No
2	Rampart Blvd. and Wilshire Blvd.	AM	0.603	B	0.602	B	- 0.001	No
		PM	0.605	B	0.605	B	0.000	No
3	Alvarado St. and 3 rd St.	AM	0.636	B	0.636	B	0.000	No
		PM	0.673	B	0.691	B	+ 0.018	No
4	Alvarado St. and 6 th St.	AM	0.493	A	0.493	A	0.000	No
		PM	0.525	A	0.527	A	+ 0.002	No
5	Alvarado St. and Wilshire Blvd.	AM	0.551	A	0.550	A	- 0.001	No
		PM	0.545	A	0.546	A	+ 0.001	No
6	Alvarado St. and 7th St.	AM	0.438	A	0.457	A	+ 0.019	No
		PM	0.479	A	0.485	A	+ 0.006	No
7	Alvarado St. and Olympic Blvd.	AM	0.724	C	0.723	C	- 0.001	No
		PM	0.803	D	0.812	D	+ 0.009	No
8	Westlake Ave. and 6 th St.	AM	0.332	A	0.314	A	- 0.018	No
		PM	0.439	A	0.430	A	- 0.009	No
9	Westlake Ave. and Wilshire Blvd.	AM	0.407	A	0.409	A	+ 0.002	No
		PM	0.457	A	0.438	A	- 0.019	No
10	Westlake Ave. and 7 th St.	AM	0.302	A	0.307	A	+ 0.005	No
		PM	0.443	A	0.452	A	+ 0.009	No
11	Bonnie Brae St. and 6 th St.	AM	0.425	A	0.443	A	+ 0.018	No
		PM	0.473	A	0.506	A	+ 0.033	No
12	Bonnie Brae St. and Wilshire Blvd.	AM	0.424	A	0.489	A	+ 0.064	No
		PM	0.489	A	0.516	A	+ 0.027	No
13	Bonnie Brae St. and 7 th St.	AM	0.351	A	0.359	A	+ 0.008	No
		PM	0.479	A	0.493	A	+ 0.014	No
14	Beaudry Ave. and Wilshire Blvd.	AM	0.515	A	0.525	A	+ 0.010	No
		PM	0.367	A	0.366	A	- 0.001	No

Table 9, *Traffic Study*, Gibson Transportation Consulting, July 2016.

Table by CAJA Environmental Services, July 2016.

Project Impacts

Construction

The project developer will attempt to park and stage for construction on-site as much as possible. During portions of the construction where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will attempted to be minimized and be conducted outside of peak traffic times.

Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and shuttle service to the site if needed. Therefore, impacts would be less than significant.

Future with Project Conditions

This describes the results of the analysis of intersection operating conditions associated with the Project when compared to future cumulative (Future without Project) conditions. The analysis year of 2020 corresponds to the anticipated buildout year of the Project. All future cumulative traffic growth (i.e., ambient and related project traffic growth) is incorporated into this analysis.

The Project-only weekday morning and afternoon peak hour traffic volumes were added to the Future without Project weekday morning and afternoon peak hour traffic volumes. The resulting volumes are illustrated in Figure 11 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices). They represent Future with Project Conditions after development of the Project under future conditions.

Table 3.16-7 summarizes the results of the Future with Project Conditions during the weekday morning and afternoon peak hours. As shown, 13 of the 14 study intersections operate at LOS D or better during all of the analyzed peak hours. The remaining intersection of Alvarado Street & Olympic Boulevard (Intersection #7) would continue to operate at LOS C during the morning peak hour and LOS E during the afternoon peak hour under Future with Project Conditions. When measuring the Future with Project Conditions against Future without Project Conditions, the incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 14 study intersections. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 14 study intersections under Future with Project Conditions, and no mitigation measures are required.

**Table 3.16-7
Future + Project Conditions (Year 2020) Significant Impact Analysis**

No.	Intersection	Peak Hour	Future Without		Future + Project			Significant Impact
			V/C	LOS	V/C	LOS	Change	
1	Rampart Blvd. and 6 th St.	AM	0.691	B	0.693	B	+ 0.002	No
		PM	0.847	D	0.848	D	+ 0.001	No
2	Rampart Blvd. and Wilshire Blvd.	AM	0.751	C	0.750	C	- 0.001	No
		PM	0.764	C	0.763	C	- 0.001	No
3	Alvarado St. and 3 rd St.	AM	0.696	B	0.696	B	0.000	No
		PM	0.744	C	0.757	C	+ 0.013	No
4	Alvarado St. and 6 th St.	AM	0.565	A	0.565	A	0.000	No
		PM	0.605	B	0.604	B	+ 0.001	No
5	Alvarado St. and Wilshire Blvd.	AM	0.718	C	0.717	C	- 0.001	No
		PM	0.713	C	0.709	C	- 0.004	No
6	Alvarado St. and 7th St.	AM	0.473	A	0.490	A	+ 0.017	No
		PM	0.561	A	0.561	A	0.000	No
7	Alvarado St. and Olympic Blvd.	AM	0.792	C	0.788	C	- 0.004	No

		PM	0.902	E	0.910	E	+ 0.008	No
8	Westlake Ave. and 6 th St.	AM	0.388	A	0.361	A	- 0.027	No
		PM	0.511	A	0.497	A	- 0.014	No
9	Westlake Ave. and Wilshire Blvd.	AM	0.558	A	0.553	A	- 0.005	No
		PM	0.613	B	0.572	B	- 0.041	No
10	Westlake Ave. and 7 th St.	AM	0.320	A	0.325	A	+ 0.005	No
		PM	0.502	A	0.507	A	+ 0.005	No
11	Bonnie Brae St. and 6 th St.	AM	0.493	A	0.510	A	+ 0.017	No
		PM	0.562	A	0.619	B	+ 0.057	No
12	Bonnie Brae St. and Wilshire Blvd.	AM	0.575	A	0.639	B	+ 0.064	No
		PM	0.645	B	0.673	B	+ 0.028	No
13	Bonnie Brae St. and 7 th St.	AM	0.369	A	0.379	A	+ 0.010	No
		PM	0.530	A	0.544	A	+ 0.014	No
14	Beaudry Ave. and Wilshire Blvd.	AM	0.654	B	0.663	B	+ 0.009	No
		PM	0.431	A	0.431	A	0.000	No

Table 10, *Traffic Study*, Gibson Transportation Consulting, July 2016.

Table by CAJA Environmental Services, July 2016.

Residential Street Segment Analysis

This section presents an analysis of the potential impacts of the limited accessibility to the Project Site (i.e., left-turn restriction on Wilshire Boulevard) to neighborhoods in the vicinity of the Project, in accordance with the methodology identified in Traffic Study Policies and Procedures.

Street Segment Traffic Volumes

Street segment ADT counts during the typical weekday were conducted at the following six street segments in May 2015, and are illustrated in Figure 12 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices):

1. Westlake Avenue between 6th Street and Wilshire Boulevard
2. Westlake Avenue between Wilshire Boulevard and 7th Street
3. Westlake Avenue between 7th Street and 8th Street
4. Bonnie Brae Street between 6th Street and Wilshire Boulevard
5. Bonnie Brae Street between Wilshire Boulevard and 7th Street
6. Bonnie Brae Street between 7th Street and 8th Street

Future without Project street segment volumes were estimated by applying an ambient growth factor to the anticipated year of project buildout and the addition of Related Project traffic to the Existing street

segment traffic volumes, and are illustrated in Figure 13 (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices). Project traffic volumes were added to the Existing and Future without Project ADT volumes to estimate the Existing with Project and Future with Project ADT volumes, as illustrated in Figure 14 and 15, respectively (in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices). It should be noted that, for the purposes of this analysis, the trips generated by the residential uses of the Project were not considered as part of the evaluation of cut-through traffic on residential streets.

Summary Of Street Segment Analysis

The analysis of the study street segments are provided in Tables 3.16-8 and 3.16-9 for Existing with Project Conditions and Future with Project Conditions, respectively. As shown, the Project results in a reduction of non-residential traffic on the analyzed residential street segments and application of the LADOT significant impact criteria to the Existing with Project and Future with Project scenario indicates that the Project is not anticipated to result in a significant impact at any of the study street segments.

**Table 3.16-8
Existing With Project Conditions (Year 2016) Street Segment Analysis**

No.	Street Segment	Average Daily (ADT) Volumes			Increase in ADT	Impact
		Existing	Project	Existing + Project		
1	Westlake, between 6 th and Wilshire	5,351	(370)	4,981	(7%)	No
2	Westlake, between Wilshire and 7 th	5,973	(198)	5,775	(3%)	No
3	Westlake, between 7 th and 8 th	5,874	0	5,874	0%	No
4	Bonnie Brae, between 6 th and Wilshire	5,075	0	5,075	0%	No
5	Bonnie Brae, between Wilshire and 7 th	4,313	0	4,313	0%	No
6	Bonnie Brae, between 7 th and 8 th	4,590	0	4,590	0%	No
<i>Residential trips were not included in the street segment analysis. Table 11, Traffic Study, Gibson Transportation Consulting, July 2016. Table by CAJA Environmental Services, July 2016.</i>						

**Table 3.16-9
Future With Project Conditions (Year 2020) Street Segment Analysis**

No.	Street Segment	Average Daily Traffic (ADT) Volumes						Increase in ADT	Impact
		Existing	Ambient Growth	Related Projects	Future Without Project	Project	Future With Project		
1	Westlake, between 6 th and Wilshire	5,351	219	160	5,730	(370)	5,360	(7%)	No
2	Westlake, between Wilshire and 7 th	5,973	245	135	6,353	(198)	6,155	(3%)	No
3	Westlake, between 7 th and 8 th	5,874	241	90	6,205	0	6,205	0%	No
4	Bonnie Brae, between	5,075	208	90	5,373	0	5,373	0%	No

	6 th and Wilshire								
5	Bonnie Brae, between Wilshire and 7 th	4,313	177	90	4,580	0	4,580	0%	No
6	Bonnie Brae, between 7 th and 8 th	4,590	188	90	4,868	0	4,868	0%	No

Residential trips were not included in the street segment analysis.

Table 12, Traffic Study, Gibson Transportation Consulting, July 2016.

Table by CAJA Environmental Services, July 2016.

Conclusion

Existing with Project Conditions in the Study Area were analyzed for the current year of 2016. Based on LADOT significance criteria, the Project is not anticipated to result in a significant impact at any of the 14 study intersections under Existing with Project Conditions. Therefore, no mitigation measures are required.

Future traffic conditions in the Study Area were forecast for the Project in Year 2020. Based on LADOT significance criteria, the Project is not anticipated to result in a significant impact at any of the 14 study intersections under Future with Project Conditions. Therefore, no mitigation measures are required.

LADOT Review and Approval

LADOT reviewed the traffic study and issued an approval letter on August 9, 2016 (included as Appendix K-2 to this MND). The results of the traffic analysis, which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community.

LADOT reviewed a voluntary project design feature improvement (remove parking on both sides of Wilshire Boulevard fronting the Project Site to provide exclusive left-turn lanes at the intersections at Westlake Avenue and Bonnie Brae Street). Wilshire Boulevard between Alvarado Street and Burlington Avenue has two travel lanes in each direction with on-street parking on both sides of the street. Eastbound and westbound left-turns are prohibited at the intersections of Wilshire Boulevard/Westlake Avenue and Wilshire Boulevard Bonnie Brae Street from 7:00 AM to 7:00 PM, Monday through Friday. The Project proposes to restripe Wilshire Boulevard to provide exclusive left-turn lanes at the intersections of Westlake Avenue and Bonnie Brae Street to improve project access and traffic operation at the intersections. However, this improvement will require the elimination of all metered parking, short-term metered parking, and various loading zones on Wilshire Boulevard between Alvarado Street and Burlington Avenue. The parking removal will adversely impact the retail developments to the north, east and west of the project site. In addition, Metro lines and the Wilshire Rapid Transit Priority Corridor will be impacted at the Stops along this reach of Wilshire Boulevard as through traffic will be impeded while bus is stopped to let passenger on/off at the Stops since the curb lane will be reduced from 18-feet to 13-feet. The traffic study did

not address any negative impacts associated with this improvement. Based on information documented in the report and inputs from LADOT staff, the proposed improvement is not recommended.

Regulatory Compliance Measure

RCM-16-1 The Project shall comply with the conditions contained within the Department of Transportation's Approval Letter for the Project, as it may be subsequently amended or modified.

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

Less Than Significant Impact. A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

The CMP requires that Traffic Impact Analysis (TIA) be performed on three types of facilities:

- Arterial Intersections
- Mainline Freeway Segments
- The Public Transit System

The CMP identifies specific arterial and freeway mainline locations for analysis.

Arterial Intersections

The CMP requires that a TIA be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the weekday morning or afternoon peak hours. A detailed analysis is not required if the project adds fewer than 50 trips to an arterial monitoring intersection. The CMP analysis uses the same CMA methodology as used in earlier chapters for City intersections to determine intersection V/C ratio and LOS. A significant impact requiring mitigation occurs if project traffic causes an incremental increase in intersection V/C ratio of 0.02 or greater to a facility projected to operate at LOS F ($V/C > 1.00$) after the addition of project traffic.

The CMP identifies the arterial monitoring intersection of Wilshire Boulevard & Alvarado Street within the Study Area. The Project would add 43 net new morning peak hour trips and two net new afternoon peak hour trips to the intersection. Thus, the Project would add fewer than 50 peak hour trips at the

arterial monitoring intersection, and the Project's CMP arterial intersection impact would be considered to be less than significant and no further analysis is required.

Mainline Freeway Segments

The CMP requires that a TIA be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the weekday AM or PM peak hours. A detailed analysis is not required if the project adds fewer than 150 trips to a mainline freeway monitoring location (in either direction) during either the weekday AM or PM peak hour. The CMP analysis uses a demand-to-capacity (D/C) ratio to determine facility LOS based on capacity identified in Appendix A of the CMP. Similar to arterial monitoring intersections, a significant impact requiring mitigation occurs if project traffic causes an incremental increase in freeway segment D/C ratio of 0.02 or greater to a facility projected to operate at LOS F ($D/C > 1.00$) after the addition of project traffic.

The CMP identifies the following two freeway mainline monitoring locations within the vicinity of the Project Site:

- I-110 south of US 101 (approximately 1.85 miles southwest of the Project Site)
- I-10 at Budlong Avenue (approximately 1.40 miles northeast of the Project Site)

The number of peak hour trips expected at each of the freeway mainline monitoring locations is as follows:

Intersection	Peak Hour Trips AM / PM Trips	Requires CMP Analysis?
I-110 south of US 101	(2) / 7	No
I-10 at Budlong Avenue	13 / 11	No

As detailed above, the Project is anticipated to add a maximum of 13 trips to the freeway mainline monitoring location of I-10 at Budlong Avenue during the weekday morning peak hour, well under the 150-trip threshold. Therefore, no CMP impact would occur and no additional freeway analysis is required under the CMP criteria for Existing or Future Conditions. It should be noted that this analysis is different from the analysis of Caltrans facilities, which was based on the screening criteria set forth in the Caltrans Agreement entered into between Caltrans and the City, while the CMP freeway segment analysis is based on the guidelines and requirements of the CMP.

The Public Transit System

The CMP requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system. Section B.8.4 of the CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 in order to estimate the number of person trips to and from the Project and to provide

guidance regarding the percentage of Project person trips that may use public transit to travel to and from the Project Site depending on the mix of uses and proximity to transit. Based on the assumption in the trip generation estimates, a 25% transit/walk-in adjustment was applied to account for the use of non-auto travel modes (e.g., rail, light-rail, bus, bicycle, walk, etc.). For the purposes of the analysis, all transit/walk-in trip estimates were conservatively assumed to travel via public transit.

Accounting for the removal of existing uses but prior to the trip reduction adjustments, the Project is anticipated to generate approximately 115 net new morning peak hour trips and 82 net new afternoon peak hour trips. Assuming an AVO of 1.4, the Project's vehicle trips result in an estimated increase of 161 person trips during the morning peak hour and 115 person trips during the afternoon peak hour. Using the 25% mode split, the Project would generate approximately 40 net new transit trips during the morning peak hour and 29 net new transit trips during the afternoon peak hour.

The Project Site is served by numerous established transit routes. The Project is also located within walking distance to the Metro Red Line/Purple Line Westlake/MacArthur Park Station and in close proximity to other local and regional transit lines. The total capacity of the analyzed transit lines within the Study Area during the morning and afternoon peak hours is approximately 1,612 and 1,698 trips, respectively. The Project's morning and afternoon peak hour person trips by transit are projected at 40 and 29 trips, respectively, or approximately less than 3% of the available capacity during morning and afternoon peak hours.

The Project Site is served by numerous Rapid and local bus lines, local LADOT DASH service, as well as the Metro Red and Purple Lines. Although the Project (and other related projects) will cumulatively add transit ridership, the Project Site and Study Area are served by a vast amount of transit service. Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips. Therefore, the Project would not exceed regional transit capacity and transit impacts would be less than significant. Furthermore, it is assumed that public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Therefore, cumulative impacts on public transit would be less than significant.

Therefore, no further analysis of CMP freeway monitoring stations is required. Therefore, the Project would have a less than significant impact.

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

No Impact. This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Driveways

Vehicular access to the Project Site would be provided via a driveway on Westlake Avenue and a driveway on Bonnie Brae Street. The driveways would provide full access (i.e., accommodate both left and right ingress and egress turning movements) and would be designed to LADOT standards under the review of City staff. Inbound traffic volumes are low enough that entering vehicles would not queue onto the public street, even if parking garage access is controlled for security.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. The Project will comply with **Mitigation Measure 16-1** to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be reduced to less than significant.

Pedestrian access to the Project would be provided at the lobby entrances on Wilshire Boulevard, as well as on Westlake Avenue for hotel guests and cultural center visitors and on Bonnie Brae Street for residents. The Project would not mix pedestrian and automobile traffic and, therefore, no pedestrian impacts would occur.

Proximity to a School

The Project Site is in proximity to the following school:¹⁹⁸

- Camino Nuevo Charter Academy, located at 697 S Burlington Avenue, 200 feet south
- Esperanza Elementary School, located at 680 Little Street, 625 feet southeast
- Liechty Middle School, located at 650 S Union Avenue, 1,250 feet southeast
- MacArthur Park Primary Center School, located at 2300 W 7th Street, 1,300 feet west

However, the potential impact will be mitigated to a less than significant level by **Mitigation Measure 14-6** (see Section 14 above).

Other Hazards

¹⁹⁸ LAUSD and Google Maps.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

Regulatory Compliance Measure

RCM-16-2 Parking Area and Driveway Plan

The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents and provide code-required emergency access, to the Bureau of Engineering and the Department of Transportation for review and approval.

Mitigation Measure

MM-16-1 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD and LAPD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site. The Project would comply with LAFD and LAPD requirements and provide adequate access for emergency vehicles and service responses. The Project would ensure that adequate and safe access, including access for emergency vehicles, remains available. Impacts related to emergency access would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit

The Project area is served by bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH), LADOT Commuter Express (CE) and Foothill Transit. Figure 3 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices) illustrates the existing transit service in the Study Area. The following provides a brief description of the bus lines providing service in the Project vicinity:

Metro Local 16 – Route 16 is a local line that travels from downtown Los Angeles to Century City via 3rd Street, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to Beverly Hills, Hancock Park, and Koreatown, and travels along 3rd Street in the vicinity of the Project Site.

Metro Local 18 – Route 18 is a local line that travels from downtown Los Angeles to Montebello and Wilshire/Western Station via 6th Street and Whittier Boulevard, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Boyle Heights, Westlake, and Koreatown, and travels along 6th Street in the vicinity of the Project Site.

Metro Local 20 – Route 20 is a local line that travels from downtown Los Angeles to Santa Monica via Wilshire Boulevard, with average headways of five to 10 minutes during the weekday morning and afternoon peak hours. It provides service to Westwood, Century City, and Koreatown, and travels along Wilshire Boulevard in the vicinity of the Project Site.

Metro Local 28 – Route 28 is a local line that travels from downtown Los Angeles to Eagle Rock/Century City via Olympic Boulevard and Eagle Rock Boulevard, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Beverly Hills, the Miracle Mile community, and Koreatown, and travels along Olympic Boulevard in the vicinity of the Project Site.

Metro Local 51/52 – Route 51/52 is a local line that travels from Wilshire Center to Compton Station/MLK Jr. Transit Center and Harbor Gateway Transit Center via Avalon Boulevard, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to Westlake, downtown Los Angeles, and Carson, and travels along 7th Street in the vicinity of the Project Site.

Metro Local 66 – Route 66 is a local line that travels from downtown Los Angeles to Montebello/Wilshire Center via 8th Street and Olympic Boulevard, with average headways of five to 10 minutes during the weekday morning and afternoon peak hours. It provides service to the Koreatown, Boyle Heights, and East Los Angeles, and travels along 8th Street in the vicinity of the Project Site.

Metro Local 200 – Route 200 is a local line that travels from Echo Park to Exposition Park via Alvarado Street and Hoover Street, with average headways of 10 minutes during the weekday morning and afternoon peak hours. This line provides service to Westlake, and travels along Alvarado Street in the vicinity of the Project Site.

Metro Local 316 – Route 316 is a limited service line that travels from downtown Los Angeles to Century City via 3rd Street, with average headways of 15 minutes during the weekday morning and afternoon peak hours. This line provides service to Beverly Hills, Hancock Park, and Koreatown, and travels along 3rd Street in the vicinity of the Project Site.

Metro Limited 352 – Route 352 is a limited service line that travels from Wilshire Center to Compton Station/MLK Jr. Transit Center and Harbor gateway Transit Center via Avalon Boulevard, with average headways of 30 to 40 minutes during the weekday morning and afternoon peak hours. It provides service to Westlake, downtown Los Angeles, and Carson, and travels along 7th Street in the vicinity of the Site.

Metro Rapid 603 – Route 603 is shuttle that travels from the Glendale Galleria to Grand Station via Hoover Street, Rampart Boulevard and San Fernando Road, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Atwater Village, Glassell Park, and Westlake, and travels along Hoover Street in the vicinity of the Project Site.

Metro Rapid 720 – Route 720 is rapid line that travels from Los Angeles/Commerce to Santa Monica via Wilshire Boulevard and Whittier Boulevard, with average headways of five to 10 minutes during the weekday morning and afternoon peak hours. It provides service to downtown Los Angeles, Hancock Park, Beverly Hills, Century City, and Brentwood. This line travels along Wilshire Boulevard and 6th Street in the vicinity of the Project Site.

Metro Rapid 728 – Route 728 is a rapid line that travels from downtown Los Angeles to Century City via Olympic Boulevard, with average headways of 15 to 20 minutes during the weekday morning and afternoon peak hours. It provides service to Beverly Hills, the Miracle Mile community, and Koreatown. This line travels along Olympic Boulevard in the vicinity of the Project Site.

LADOT DASH Pico Union/Echo Park – DASH Pico Union/Echo Park is a local line that travels through Pico Union/Echo Park. It generally travels on 3rd Street, 6th Street, Union Avenue, Washington Boulevard, and Echo Park Avenue, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides a direct connection to the Metro Blue Line Grand/LATTC Station and Metro Red Line/Purple Line Westlake/MacArthur Park Station.

LADOT CE 534 – Route 534 is a commuter express line that travels from downtown Los Angeles to Westwood with average headways of 25 minutes during the weekday morning and afternoon peak hours. It provides service to Century City and Beverly Hills, and along Olympic Boulevard.

Foothill Transit 481 – Route 481 is an express line that travels from downtown Los Angeles to El Monte with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides

service to Monterey Park, City Terrace, and Koreatown, and travels along Wilshire Boulevard in the vicinity of the Project.

In addition to the bus lines that provide service within the Project vicinity, the Metro Red and Purple Line subways operate in the Study Area. The Metro Red Line runs between North Hollywood and downtown Los Angeles, connecting with the Metro Orange Line in North Hollywood, the Metro Purple Line at Wilshire Boulevard, the Metro Blue Line and Metro Expo Line in downtown Los Angeles, and the Metro Gold Line at Union Station. The Metro Purple Line runs between Koreatown and downtown Los Angeles, connecting with the Metro Red Line at Wilshire Boulevard, the Metro Blue Line and Metro Expo Line in downtown Los Angeles, and the Metro Gold Line at Union Station. In the Project vicinity, the Metro Red and Purple Lines Westlake/MacArthur Park Station at Alvarado Street & Wilshire Boulevard is less than 500 feet west of the Project Site.

The Metro bus lines have available capacity for approximately 1,612 additional riders during the morning peak hour and 1,698 riders during the afternoon peak hour. The CE transit system and Metro Bus lines 16/316, 28, and 728 were not included because the bus stop locations are located more than one quarter-mile from the Project Site. See Table 4 in *Traffic Study*, Gibson Transportation Consulting, July 2016, included in the Appendices.

Bicycles

Based on 2010 Bicycle Plan, A Component of the City of Los Angeles Transportation Element (Los Angeles Department of City Planning, 2010) the existing bicycle system in the Study Area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III). Bicycle lanes are a component of street design with dedicated striping, separating vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. Bicycle routes are identified as bicycle-friendly streets where motorists and cyclists share the roadway and there is no dedicated striping of a bicycle lane. Bicycle routes are preferably located on collector and lower volume arterial streets. The following bicycle facilities are provided along corridors within the Study Area:

- Bicycle Lanes (Class II)
 - 7th Street
 - Rampart Boulevard between 3rd Street and 6th Street
- Bicycle Routes (Class III)
 - Rampart Boulevard between 6th Street and Hoover Street

Similar to the street designations of the General Plan, the bicycle facilities of 2010 Bicycle Plan have been re-designated with the adoption of the Mobility Plan. The components of 2010 Bicycle Plan have been incorporated into the bicycle network of the Mobility Plan, which consists of a Low-Stress Bikeway System and a Bicycle Lane Network. The Low-Stress Bikeway System is comprised of the Bicycle Enhanced Network, the Neighborhood Enhanced Network, and Bicycle Paths. The Bicycle Enhanced

Network includes protected bicycle lanes and neighborhood streets. Bicycle lanes could provide infrastructure including cycle tracks, bicycle signals, and demarcated areas to facilitate turns at intersections. Neighborhood streets would typically provide mini-roundabouts, cross-street stop signs, crossing islands at major intersection crossings, improved street lighting, bicycle boxes, and bicycle-only left-turn pockets. The Neighborhood Enhanced Network and Bicycle Paths are relatively unchanged from 2010 Bicycle Plan.

Pedestrian Facilities

The walkability of existing facilities is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile; these attributes are quantified by WalkScore.com and assigned a score out of 100 points. With the various commercial businesses and cultural facilities adjacent to residential neighborhoods of the Westlake community, the walkability of the Project site is approximately 96 points¹⁹⁹ this compares to the citywide score of 90 points. The sidewalks that serve as routes to the Project Site provide proper connectivity and adequate widths for a comfortable and safe pedestrian environment. The sidewalks provide connectivity to pedestrian crossings at intersections within the Study Area. The following signalized intersections provide pedestrian facilities to limit illegal mid-block crossings to the Project Site (all intersections have marked pedestrian crossings on all approaches):

- Westlake Avenue & Wilshire Boulevard
- Westlake Avenue & 7th Street
- Bonnie Brae Street & Wilshire Boulevard
- Bonnie Brae Street & 7th Street

The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

¹⁹⁹ WalkScore.com (www.walkscore.com) rates the Project Site (1930 Wilshire Boulevard) with a score of 96 of 100 possible points (scores accessed on June 7, 2016 for the Westlake community). Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.

17. TRIBAL CULTURAL RESOURCES

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

- a) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Less Than Significant Impact with Mitigation Incorporated. The analysis of the potential impacts to historical resources has concluded that the Project rehabilitation of the Wilshire Medical Building has the potential to result in a significant impact if not mitigated to ensure that the rehabilitation will be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation. The Project will add new construction on land that was previously used for surface parking. This addition, however, will not result in substantial adverse changes that reduce the integrity or significance of historic resources either adjacent to or in the near vicinity of the Project Site. **Mitigation Measures 5-1 and 5-2** would protect historic resources from potential impacts associated with the Project. Impacts would be reduced to less than significant.

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

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition

of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed under Question 5(b), the Project Site does not contain any known archaeological sites or archaeological survey areas. The Native American Heritage Commission (NAHC) was contacted for information and to conduct a Sacred Lands File Search (SLFS). The NAHC responded on May 17, 2016 (included as Appendix E-3 of this MND) and provided the Tribal Consultation List. Per their response, “A search of SFL was completed for the USGS quadrangle information provided with negative results.” The City contacted the tribes listed on the Tribal Consultation List. No specific site-related evidence was provided that the Project Site contains a resource. In addition, the Project would comply with **Regulatory Compliance Measure 5-1**, which would protect any potential archaeological resources that are discovered during excavation. In addition, **Regulatory Compliance Measure 5-3** would protect any human remains discovered.

Thus, as 1) the Project Site is not listed nor eligible for listing on the national, State, or local register of historic resources; and 2) due to the lack of substantial evidence in City and NAHC databases, or resultant from the AB 52 process demonstrating otherwise, the City, as lead agency, has determined the Project Site is not a TCR as defined by PRC Section 21074. Nonetheless, so as to ensure any unforeseen and inadvertent discovery of TCR would not result in any potentially significant impact, in the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project Site until potential TCRs are properly assessed following specific protocol required by the Department of City Planning. Therefore, impacts would be less than significant.

18. UTILITIES AND SERVICE SYSTEMS

This section is based on the following items, included as Appendix L of this IS/MND:

L-1 Response from Los Angeles Bureau of Sanitation, June 20, 2016.

L-2 Water Supply Assessment, Los Angeles Department of Water and Power, December 13, 2016.

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

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.²⁰⁰ Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)²⁰¹, which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,²⁰² and currently treats an average daily flow of approximately 362 mgd.²⁰³ Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.²⁰⁴ This allocation allowance is monitored by the HTP and the Project's contribution would not affect the amount. Further, the HTP is a

²⁰⁰ *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

²⁰¹ *LA Sewers:* http://www.lasewers.org/treatment_plants/about/index.htm.

²⁰² *Los Angeles Sanitation:* <http://www.lacitysan.org/irp/Wastewater.htm>.

²⁰³ *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website:* <http://www.lacitysan.org/wastewater/factsfigures.htm>.

²⁰⁴ *Los Angeles City Clerk, Ordinance 166,060:* <http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121>.

public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's hotel and bar/restaurant discharge is typical of the area and would not require any on-site treatment before flowing to the sewer. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on Table 3.18-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a total of approximately 70,930 gallons per day (gpd) (or 0.071 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

**Table 3.18-1
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Existing Uses			
Office Building	30,000 sf	120 gallons / 1,000 sf	(3,600)
Medical Building	74,000 sf	225 gallons / 1,000 sf	(16,650)
Proposed New Uses			
Hotel	220 rooms	120 gallons / room	26,400
Residential – Studio	120 units	75 gallons / unit	9,000
Residential – 1 Bedroom	240 units	110 gallons / unit	26,400
Residential – 2 Bedroom	118 units	150 gallons / unit	17,700
School: Arts/Dancing/Music	50 students	11 gallons / student	550
Theater	850 seats	3 gallons / seat	2,550
Restaurant	176 seats	30 gallons / seat	5,280
Bar	220 seats	15 gallons / seat	3,300
Total Increase			70,930
<i>Note: sf = square feet; cf = cubic feet; gpd = gallons per day</i> <i>Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</i> <i>Bureau of Sanitation response, June 20, 2016.</i> <i>Table: CAJA Environmental Services, November 2016.</i>			

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system which currently treats an average daily flow of approximately 362 mgd.²⁰⁵ Thus, there is a remaining capacity of approximately 88 mgd. The increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant. The Project Site will be served by the LABS, which provides municipal wastewater services to the City.

The Site is served by an 8-inch line on the alley and a 14-inch line on Wilshire Boulevard. The sewage from both existing lines joins to feed into a 16-inch line on Wilshire Boulevard and then into a 45-inch sewer line on 11th Street before discharging into a 63-inch sewer line on 11th Street. The current approximate flow level (depth/diameter or d/D) and the design capacities at d/D of 50% is shown in Table 3.18-2.²⁰⁶

**Table 3.18-2
Sewer Infrastructure**

Pipe Diameter (inches)	Location	Current Gauging d/D (%)	50% Design Capacity
8	Alley	29	347,785 gpd
14	Wilshire Boulevard	29	1.64 MGD
16	Wilshire Boulevard	30	2.23 MGD
45	11 th Street	29	14.96 MGD
63	11 th Street	27	21.80 MGD
<p>* no gauging available. gpd = gallons per day. MGD = million gallons daily. Bureau of Sanitation response, June 20, 2016. Table: CAJA Environmental Services, July 2016.</p>			

Based on the estimated flow, it appears the sewer system might be able to accommodate the total flow for the Project.²⁰⁷ The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit

²⁰⁵ LABS, *Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant*, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>.

²⁰⁶ Bureau of Sanitation response, April 28, 2016.

²⁰⁷ Bureau of Sanitation response, April 28, 2016.

process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity (see **Mitigation Measure 18-1**). A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed mitigation measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other hotel uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system (remaining capacity of approximately 88 mgd or at 80 percent capacity), and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater. Therefore, with the mitigation detailed below in **Mitigation Measure 18-1**, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

Water Consumption and Treatment Facilities

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. As shown on Table 3.18-3, Project Estimated Water Consumption, it is estimated the Project will consume a total of approximately 145,647 gallons per day (gpd) (or 0.145 mgd or 163.15 acre-feet per year²⁰⁸) of water.

**Table 3.18-3
Estimated Future Water Demand**

Use	Size	Water Use Factor ³ (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings ⁴ (gpd)	Water Demand	
					(gpd)	AF/year
Existing Uses ¹						
Office	30,000 sf	-	-	-	-	-
Medical Office	74,000 sf	-	-	-	-	-
Existing to be removed ²					7,453	8.35
Proposed Uses ¹						
Residential: Studio	120 du	75	9,000			

²⁰⁸ 1 acre foot = 325,851.429 US gallons.

Residential: 1 bedroom	240 du	110	26,400			
Residential: 2 bedroom	118 du	150	17,700			
Base Demand Adjustment (residential) ⁵			5,748			
Residential Units Total	478 du		58,848	16,327	42,521	47.63
Pool	720 sf	-	68			
Rooftop and Podium Deck Bar	36,472 sf	0.72	26,260			
Health Club	3,272 sf	0.65	2,127			
Rooftop Gym	2,337	0.20	469			
Club/Bar	7,686 sf	0.72	6,534			
Base Demand Adjustment (Residential Common) ⁵			0			
Residential Common Total			34,458	1,041	33,417	37.43
Hotel Room	220 rooms	120	26,400			
Base Demand Adjustment (Hotel Room) ⁶			2,413			
Hotel Room Total			28,813	3,221	25,592	28.67
Live/Work: Residential	1 du	110	110			
Live/Work: Office ⁶	5,095 sf	0.12	611			
Bar: Cocktail	5,709 sf	0.72	4,110			
Restaurant: Full Service Indoor Seat	200 seats	30	8,000			
Ballroom	1,846 sf	0.35	647			
Base demand Adjustment (Hotel Other) ⁵			124			
Hotel Other Uses Total			11,602	6,434	5,168	5.79
Theater	850 seats	3	2,550			
School: Arts/Dance/Music	50 students	11	550			
Office	11,245 sf	0.12	1,349			
Gallery	4,132 sf	0.03	124			
Dining ⁷	10,332 sf	0.30	3,100			
Base Demand Adjustment (Commercial) ⁵			345			
Cultural Center Total	69,979 sf		8,018	4,527	3,491	3.91
Landscaping⁸	11,596 sf		1083	502	581	0.65
Parking Structure⁸	474,513 sf	0.02	312	0	312	0.35
Cooling Tower – Residential	1,374 ton	36	46,958	22,273	26,685	29.89
Cooling Tower – Hotel	318 tons	36	11,326	2,286	9,062	10.15
Cooling Tower – Cultural Center	741 tons	21	15,614	3,123	12,491	13.99
Cooling Tower Total			75,900	27,662	48,238	54.04
Proposed Subtotal			219,034	59,714	159,320	178.47
Less Existing to be removed					-7,463	-8.35
Less Additional Conservation¹⁰					-8,220	6.97

Net Additional Water Demand	145,647	163.15
<p>¹ Provided by the City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope confirmation email.</p> <p>² The existing water demand is based on the LADWP billing data (average of 5 years from 2011 to 2015), and includes water use for the surrounding parking lot, landscape, and cooling tower.</p> <p>³ Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.</p> <p>⁴ The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (Calgreen), 2014 Los Angeles Plumbing Code, and 2014 LA Green Building Code.</p> <p>⁵ Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.</p> <p>⁶ 2/3 of 7,642 sf Live/Work unit is assumed to be work space.</p> <p>⁷ Cultural Center includes 6,888 sf kitchen. Dining area square footage is estimated from the assumption of 40% kitchen and 60% dining area ratio.</p> <p>⁸ Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Model Water Efficient Landscape Ordinance.</p> <p>⁹ Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumptions.</p> <p>¹⁰ Water conservation due to additional conservation commitments agreed by the Applicant.</p> <p>Source: LADWP, Water Supply Assessment, December 13, 2016.</p>		

The Water Service Organization (WSO) should be able to provide the domestic needs of the Project from the existing water system. The WSO cannot determine the impact on the existing water system until the fire demands of the Project are known. Once a determination of the fire demands has been made, LADWP will assess the need for additional facilities, if needed. This is described as **Mitigation Measure 18-2**. The Project will also comply with the following measure:

Regulatory Compliance Measure

RCM-18-1 Fire Water Flow

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Project, and will contact a Water Service Representative at the LADWP to order a Sewer Availability Request (SAR). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has

between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. **Mitigation Measure 18-2** will ensure that the Project's impacts to the water conveyance system would be less than significant.

Mitigation Measures

MM-18-1 Wastewater Service

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

MM-18-2 Water Service

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan.

- c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff

increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project Site is located in an urbanized area of the City. The Project Site is entirely covered with buildings and surface parking lot. The Project will similarly cover the entire site with multiple building. Thus, the Project would not be altering the amount of impervious surface that affects runoff.

Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff.

Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRC, and Low Impact Development requirements. The Project is required to implement stormwater control measures during its construction phase. Any construction during the rainy season (between October 1 and April 15) would implement a Wet Weather Erosion Control Plan. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for polluted runoff to a less than significant level.

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

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

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

- (a) Residential developments of more than 500 dwelling units;
- (b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

- (c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;
- (d) Hotels or motels with more than 500 rooms;
- (e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;
- (f) Mixed use projects containing any of the foregoing; or
- (g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

WSA Results

The Project is subject to SB 610 and conducted a Water Supply Assessment (WSA). According to the WSA and included in Table 3.17-3 above, the Project total net water demand is estimated to be 163 acre-feet per year (AFY), which includes annual water conservation. Savings due to water conservation ordinances are approximately 67 AFY, and savings due to additional voluntary conservation measures are approximately 7 AFY. LADWP's WSA finds adequate water supplies will be available to meet the total additional water demand of 87 AFY. LADWP anticipates the projected water demand can be met during normal, single-dry and multiple-dry water years, in addition to the existing and planned future demands on LADWP.²⁰⁹

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.²¹⁰ The 2015 Urban Water Management Plan (UWMP) takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on

²⁰⁹ LADWP, *Water Supply Assessment*, December 13, 2016.

²¹⁰ LADWP, *Drought Information*: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afLoop=932704326968157.

average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.²¹¹

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. The Executive Order provides water savings by directing the State Water Resources Control Board to implement mandatory water reductions in cities and towns to reduce water usage by 25% or approximately 1.5 million acre-feet. The Executive Order calls for local water agencies to implement conservation pricing to discourage water waste.²¹² State mandated conservation and reductions are implemented by LADWP.

The Project is estimated to use approximately 163 acre-feet per year. The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.²¹³ The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP.²¹⁴ The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).²¹⁵ Neither the Urban Water Management Plan forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use [The Project is proposing a General Plan Amendment and other approvals]. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. As set forth above, the Project is consistent with the General Plan.

The following regulatory compliance measures would ensure that impacts related to the project's water demand remain less than significant:

Regulatory Compliance Measures

²¹¹ 2015 Urban Water Management Plan, Los Angeles, pg. ES-12: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmp.jsessionid=srrZYTBChtJ5vRYvSnnxXhbpWtpVLLTJtslMvb1C6Lkhhk1VkpS7!105536960?_afLoop=497651613704643&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D497651613704643%26_afWindowMode%3D0%26_adf.ctrl-state%3Dl1f84douz_4, June 28, 2016.

²¹² California Governor: <http://gov.ca.gov/news.php?id=18910>, accessed August 19, 2015.

²¹³ 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

²¹⁴ 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

²¹⁵ SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

RCM-18-2 Water Efficiency Requirements

The Project shall implement all applicable mandatory measures of Ordinance No. 180,822 (Water Efficiency Requirements for New Development), the 2014 LA Plumbing Code, 2013 Cal Green Building Code, and 2014 LA Green Building Code the LA Green Building Code that would have the effect of reducing the Project's water use.

RCM-18-3 Landscape

The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM-18-4 LID Ordinance and Stormwater BMPs

The Project shall comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's generation of 0.071 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill"), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.²¹⁶

²¹⁶ City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf.

Facilities

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,582 tpd (2014 daily average).²¹⁷ It is expected to close in 2037.²¹⁸ It has a remaining daily intake availability of 4,993 tpd, and has approximately 96.8 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy.²¹⁹ As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).²²⁰ Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.²²¹ Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.²²² The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.²²³ It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity. The County is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean

²¹⁷ County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

²¹⁸ 23 years remaining life as of 2014 Annual Report, prepared in December 2015.

²¹⁹ State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail>, accessed August 19, 2015.

²²⁰ Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, accessed August 19, 2015.

²²¹ Sunshine Canyon: <http://www.sunshinecanyonlandfill.com/home/Future.html>, August 27, 2015.

²²² County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

²²³ County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: <http://dpw.lacounty.gov/epd/swims/>, Appendix E-2, Table 1, April 11, 2016.

energy.²²⁴ Additionally, the County recently completed its final Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition will remove approximately 2,500 cubic yards (cy) of buildings. Demolition would produce demolition waste and recycling opportunities of raw materials and export of approximately 90,000 cy of dirt.²²⁵ Construction of the approximately 514,887 square feet of new residential floor area, 69,979 square feet of new cultural floor area, and 474,513 square feet of parking structure would generate approximately 2,222 tons of construction waste.²²⁶ Construction is estimated to take approximately 24 months. Therefore, Project construction would generate approximately 3.86 tons per day of construction waste on average throughout the construction phase.²²⁷

A majority of the City's construction and demolition waste was sent to the Puente Hills Landfill.²²⁸ The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.²²⁹ The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.²³⁰ In 2016, the Puente Hills Intermodal

²²⁴ Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.

²²⁵ Client provided, July 2016.

²²⁶ Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).

²²⁷ 24 months x 24 working days per month = 576 working days. 2,222 / 576 days = 3.86 tons per day.

²²⁸ City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFacilitySystemInfrastructureFactSheet_032009.pdf.

²²⁹ County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed August 27, 2015.

²³⁰ County Sanitation Districts, Puente Hills MRF Fact Sheet: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed August 27, 2015.

Facility provides a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.²³¹ The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.²³² The Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste. Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Therefore, short-term construction impacts to landfills and solid waste services will be less than significant.

Operation

As shown on Table 3.18-3, Project Estimated Solid Waste Generation, it is estimated the Project will generate a total of approximately 8,371 pound per day (or 4.19 tons per day) of solid waste. This total does not take any credit for the proposed sustainable and recycling features of the Project.

**Table 3.18-3
Project Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Office (to be removed)	104,000 sf	6 pounds / 1,000 sf	(624)
Hotel	220 rooms	4 pounds / room	880
Residential	478 units	12.23 pounds / unit	5,846
School: Arts/Dancing/Music	50 students	0.5 pounds / student	25
Theater	69,979 sf	31.2 pounds / 1,000 sf	2,183
Restaurants and Bars	12,141.3 sf	5 pounds / 1,000 sf	61
Total Increase			8,371
<p><i>Note: sf = square feet</i></p> <p><i>Rates: CalRecycle Estimated Solid Waste Generation Rates:</i> http://www.calrecycle.ca.gov/wastechar/wastegenrates/</p> <p><i>Restaurant: 5 pounds/1,000 sf.</i></p> <p><i>Other: 31.2 pounds/1,000 sf. Includes museums, art galleries, theaters, recreational services, health clubs, repair services.</i></p> <p><i>Hotel: 4 pounds/room. Lobby solid waste generation is expected to be minimal due to the areas not being very large congregation spaces or providing goods that would be disposed of.</i></p> <p><i>Table: CAJA Environmental Services, November 2016.</i></p>			

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.25 tons per day increase in solid waste resulting from the Project. Further, pursuant to AB 939, each city and county in

²³¹ Puente Hills Landfill: <http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708>, August 27, 2015.

²³² Mesquite Regional Landfill: <http://www.mrlf.org/index.php?pid=5>, August 27, 2015.

the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City had an accelerated goal of 75 percent by 2013. During fiscal 2013-14, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,²³³ with the goal to achieve a 90 percent diversion by 2025.²³⁴ The regulatory compliance measure listed below would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

Regulatory Compliance Measures

RCM-18-5 Designated Recycling Area

In compliance with Los Angeles Municipal Code, the proposed Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

RCM-18-6 Construction Waste Recycling

In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

RCM-18-7 Commercial/Multifamily Mandatory Recycling

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

²³³ City of Los Angeles, Department of Public Works, Annual Report, 2013-14: <http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf>, April 11, 2016.

²³⁴ City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18: http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf, accessed February 24, 2014.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills. The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to close in 2037. The Waste-By-Rails program to the Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

ENERGY ANALYSIS

Regulatory Framework

State Building Energy Efficiency Standards

New buildings in California are required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations (CCR) [add reference to rehabilitating historic resources]. The California Green Building Standards Code (CalGreen) establishes “energy budgets” for different types of residential and nonresidential buildings, with which all new buildings must comply. The energy budget has a space conditioning component and a water-heating component, both expressed in terms of energy (British thermal units, or BTU) consumed per year. The regulations allow for trade-offs within and between the components to meet the overall budget. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.²³⁵

California Green Building Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable

²³⁵ CalGreen: http://www.documents.dgs.ca.gov/bsc/CALGreen/2010_CA_Green_Bldg.pdf, April 8, 2016.

construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” As of January 1, 2011, the California Green Building Standards Code is mandatory for all new buildings constructed in the state. The California Green Building Standards Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The California Green Building Standards Code was most recently updated in 2013 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2014.

2015 Final Power Integrated Resource Plan²³⁶

The LADWP released the 2015 Final Power Integrated Resource Plan (IRP) in December 2015, which provides a 20-year framework to ensure LADWP will meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The IRP is an update of the 2014 IRP, and reflects evolving environmental, regulatory, and economic developments. Major changes from the 2014 IRP include a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; efforts underway to expand upon the existing Power Reliability Program (PRP) by developing a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012’s IRP.

This 2015 IRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 megawatt (MW) of large scale solar, approval of the 250 MW Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The FiT 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10 MW, together with a commitment to a large utility scale project of approximately 50 MW to be built by the same vendor at LADWP’s Beacon Solar site.²³⁷ This IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that

²³⁶ 2015 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afzLoop=399494189004579.

[227 footnote missing]

balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.²³⁸

Los Angeles Department of Water and Power

Electricity

The LADWP supplies more than 26 million megawatt hours (mw-h) of electricity a year for the City of Los Angeles' 1.4 million customers.²³⁹ The utility was established more than 100 years ago to provide water and electric needs to the City's businesses and residents. LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. The power supply sources include: 39 percent from coal, 22 percent from natural gas, 3 percent from large hydroelectric, 11 percent from nuclear, 5 percent from unspecified sources, and 20 percent from renewables which include small hydroelectric, solar, wind, geothermal, biomass, and waste.²⁴⁰ Under the City Charter, LADWP has an obligation to serve the citizens of the City.²⁴¹

Table 3.18.4, LADWP Electricity Capacity, shows the LADWP electricity system capacity and Table 3.18-5, LADWP Energy Usage, shows the LADWP power usage. Table 3.18-6, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table 3.18-4
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177

²³⁸ LADWP, 2015 IRP, pg ES-1: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afLoop=399494189004579.

²³⁹ LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afLoop=81976737428000, April 8, 2016.

²⁴⁰ LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afLoop=82063279159000&_afWindowMode=0&_afWindowId=na2o8wvza_1#%40%3F_afWindowId%3Dna2o8wvza_1%26_afLoop%3D82063279159000%26_afWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33, April 8, 2016.

²⁴¹ LADWP Reliability Study, December 31, 2010, pg. i: http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/sa_ladwp_2011reliability.pdf.

Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afLoop=1119458526572567
 Table: CAJA Environmental Services, July 2016.

Table 3.18-5
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	23.14

Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afLoop=1119458526572567.
 Table: CAJA Environmental Services, July 2016.

Table 3.18-6
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2016-17	8,206	12,760	1,985	455	224	26,878	6,721
2017-18	8,215	12,586	1,989	457	270	26,714	5,671
2018-19	8,242	12,413	1,994	458	350	26,638	5,650
2019-20	8,279	12,251	1,997	460	429	26,695	5,634
2020-21	8,328	12,339	1,997	462	512	26,859	5,638
2021-22	8,411	12,576	1,998	464	592	27,297	5,730
2022-23	8,510	12,772	1,997	466	675	27,728	5,812
2023-24	8,613	12,989	1,996	468	755	28,253	5,899
2024-25	8,710	13,230	1,994	469	834	28,649	5,991

gw-h – gigawatt-hours; mw – megawatts
 Misc. includes streetlighting, Owens Valley, and intra-departmental
 LADWP, 2015 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnave_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afLoop=399494189004579
 Table: CAJA Environmental Services July 2016.

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts).

Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.²⁴²

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:²⁴³

- Load Factor (%) = (kw-h / hours / kw) X 100%
- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Southern California Gas Company

Natural Gas

Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout the southern half of California. SCG owns and operates 95,000 miles of gas distribution mains and service lines, as well as nearly 3,000 miles of transmission and storage pipeline. The utility also owns

²⁴² LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afLoop=1251830725757441, April 14, 2015.

²⁴³ Madison Gas and Electric, Glossary for Load Factor: <http://www.mge.com/about/electric/glossary.htm#f>, April 11, 2016.

gas transmission compressor stations and underground storage facilities. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.²⁴⁴ Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2016 California Gas Report has projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.6% from 2016 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to decline from 113 Bcf in 2016 to 105 Bcf by 2035. The change reflects an annual growth rate of 0.5% over the forecast period. The noncore, non-EG markets are expected to decline from 170 Bcf in 2016 to 153 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is forecast to level off in 2016 and remain relatively flat through 2035 as gains are offset by the depletion of older oil fields.²⁴⁵

Supply

In 2016 gas demand for California is projected to average 6,072 million cubic feet per day (cf/day) and is projected to decrease to 4,626 million cf/day by 2035, a decline of 1.35 percent per year.²⁴⁶ Table 3.18-7, Statewide Total Supplies and Requirements, shows the anticipated statewide total supplies and

²⁴⁴ 2016 CA Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, December 16, 2016.

²⁴⁵ 2016 CA Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, December 16, 2016...

²⁴⁶ 2016 CA Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, November 19, 2016.

requirements for natural gas for 2014 to 2030. In 2014 (the latest data available from the 2014 California Gas Report), SCG's highest winter sendout was 4,881 million cf/day and highest summer sendout was 3,393 million cf/day.²⁴⁷

Table 3.18-7
Statewide Total Supplies and Requirements

	2016	2018	2020	2025	2030
Utility Supply Source					
California Sources	165	165	165	165	165
Out-of-State	5,060	4,758	4,668	4,599	4,489
Non-Utility Served Load	1,132	985	813	547	258
Statewide Supply Source Total	6,358	5,909	5,645	5,312	4,912
Utility Requirements					
Residential	1,181	1,185	1,155	1,114	1,076
Commercial	484	481	473	454	443
Natural Gas Vehicles	46	50	54	66	85
Industrial	964	943	932	930	938
Electric Generation	1,897	1,623	1,566	1,548	1,453
Enhanced Oil Recovery Steaming	46	46	46	46	46
Wholesale/International Exchange	241	246	247	247	256
Company Use and Unaccounted-For	79	74	73	72	71
Non-Utility Served Load	1,132	985	813	547	258
Statewide Requirements Total	6,072	5,623	5,360	5,026	4,626
<i>All measurements in million cf per day</i> <i>Average temperature and normal hydro year.</i> Source: 2016 California Gas Report https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf Table: CAJA Environmental Services December 2016.					

²⁴⁷ 2016 CA Gas Report: <https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf>, December 16, 2016.

Demand

The SCG demands for 2015 and 2035 are shown in Table 3.18-8. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.²⁴⁸

Table 3.18-8
SCG Natural Gas Demands

	2015	2035	Difference
Residential	239	218	-21
Core Commercial	81	65	-16
Non-Core Commercial	16.4	14.7	-1.7
Industrial	21.6	15.3	-6.3
<i>All measurements in billion cf</i> <i>Source: 2016 California Gas Report, pgs. 64-66:</i> https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf , <i>Table: CAJA Environmental Services December 2016.</i>			

ENVIRONMENTAL IMPACTS

Thresholds of Significance

State CEQA Guidelines

Appendix F, Energy Conservation, of the *CEQA Guidelines* directs an EIR²⁴⁹ to include the following:

- (a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed;
- (b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- (c) The effects of the project on peak and base period demands for electricity and other forms of energy;
- (d) The degree to which the project complies with existing energy standards;

²⁴⁸ 22014 California Gas Report, pg. 64: <http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf>.

²⁴⁹ The analysis is included in this MND for disclosure purposes.

- (e) The effects of the project on energy resources; and
- (f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

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

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or
- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Methodology

The South Coast Air Quality Management District (SCAQMD) has electricity²⁵⁰ and natural gas²⁵¹ consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the State *CEQA Guidelines* further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the State *CEQA Guidelines*, this includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

Project Impacts

²⁵⁰ SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.

²⁵¹ SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.

Construction

Fuel Consumption

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))²⁵² to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated. Heavy-duty construction equipment associated with these activities would include diesel-fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The equipment will be in compliance with the Project Design Features and Regulatory Compliance Measures required in the Air Quality and Noise sections of this MND. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 6.178 mpg in 2015.²⁵³

²⁵² California Air Resources Board, *Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles*, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

²⁵³ California Department of Transportation, *2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7*, <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>.

During Project construction, energy would be consumed in three general forms: (1) petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, as well as delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities); (2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance), and electricity associated with providing temporary power for lighting and electronic equipment inside temporary construction trailers and within the proposed structures; and (3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

The petroleum-based fuel use summary represents a conservative estimate of energy that would be consumed throughout the Project construction period based on maximum intensity construction assumptions. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. In addition, construction activities would be subject to compliance with applicable regulatory requirements designed to reduce the consumption of energy resources. Specifically, regulatory requirements would require idling of all diesel-fueled commercial vehicles weighing over 10,000 pounds during construction to be limited to five minutes at any location. Compliance with this measure would reduce the Project's reliance on petroleum-based fuels during construction activities and the Project's consumption of petroleum-based fuels would not have an adverse impact on available supplies. In addition, with regard to trips for hauling demolition materials, the City of Los Angeles has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. The project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris, which would reduce the wasteful, inefficient, and unnecessary consumption of energy, and provide for reduced transportation-related energy usage compared to similar projects in other jurisdictions.

In 2012, California consumed a total of 337,666 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.1 billion gallons by the transportation sector.²⁵⁴ Construction of the Project would represent 0.001 percent of the statewide fuel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

Electricity Consumption

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). Electricity, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to

²⁵⁴ US EPA, *State Energy Data System*, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf.

reduce air pollution by using electricity from power poles, rather than temporary diesel or gasoline powered generators. A temporary water supply, primarily for fugitive dust suppression and street sweeping, would also be supplied by the LADWP. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions since the Site is occupied. Therefore, electricity impacts during construction would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))²⁵⁵ to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

Electricity Demand

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that

²⁵⁵ California Air Resources Board, *Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles*, <http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf>.

in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8.242 gw-h and commercial uses consisting of 12.413 gw-h. The peak demand would be 5,650 megawatts (mw).²⁵⁶

As shown in Table 3.18-9, Project Estimated Electricity Demand, the Project would demand approximately 3,030,764 kw-h/year (3.03 gw-h/year) of electricity. This total does not take any credit for the proposed sustainable and energy conservation features of the Project.

**Table 3.18-9
Project Estimated Electricity Demand**

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Office (to be removed)	104,000 sf	12.95 kw-h / sf	(1,346,800)
Hotel - Includes the hotel-affiliated restaurant and bar	99,679 sf	9.95 kw-h / sf	991,806
Residential	478 units	5,626.5 kw-h / unit	2,689,467
Cultural Center - Restaurant (including banquet, café, and kitchen spaces)	69,979 sf	9.95 kw-h / sf	696,291
Total Increase			3,030,764
<i>sf = square feet; kw-h = kilowatt-hour; yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Table: CAJA Environmental Services, July 2016.</i>			

The Project's annual electricity consumption would represent approximately 0.01 percent of the forecasted electricity demand in 2018-19.²⁵⁷ Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 mw of power with a current peak of 6,177 mw. Thus, there is 1,055 mw of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow to 5,786 mw in 2018-2019 and 6,166 mw in 2023-2024.²⁵⁸ Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. Thus, there is adequate supply capacity to serve

²⁵⁶ LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_afrctrl-state=9kjcyeafd_4&_afrcLoop=1178238919540287.

²⁵⁷ $3.03 / 26,638 \times 100\% = 0.01\%$

²⁵⁸ 2014 Power Integrated Resource Plan, Table 2-3, Forecasted growth in Annual Peak Demand: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_afrcLoop=1185569764107656&_afrcWindowMode=0&_afrcWindowId=9kjcyeafd_1#%40%3F_afrcWindowId%3D9kjcyeafd_1%26_afrcLoop%3D1185569764107656%26_afrcWindowMode%3D0%26_afrcctrl-state%3D1ahsnk3itw_4.

the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.²⁵⁹ It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

As shown in Table 3.18-10, Project Estimated Natural Gas Demand, the Project is estimated to demand approximately a net increase of 2,390,895 cf/month (79,697 cf/day) of natural gas. This total represents a more conservative result since it does not take any credit for the proposed sustainable and energy conservation features of the Project.

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2016 is estimated at 2,947 million cf/day and 2022 is estimated at 2,849 million cf/day. The Project's 79,697 cf/day represents approximately 0.003 percent of the 2022 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure as a result of the Project would occur.

²⁵⁹ LADWP Rules Governing Water and Electric Service: [http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/\\$FILE/Rule%2016-d.pdf](http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf).

**Table 3.18-10
Project Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Office (to be removed)	104,000 sf	2.0 cf / mo	(208,000)
Hotel - Includes the hotel-affiliated restaurant and bar	99,679 sf	4.8 cf / mo	478,459
Residential	478 units	4,011.5 cf / mo	1,917,497
Cultural Center - Restaurant (including banquet, café, and kitchen spaces)	69,979 sf	2.9 cf / mo	202,939
Total Increase			2,390,895
<i>sf = square feet; cf = cubic feet; mo = month</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Table: CAJA Environmental Services, July 2016.</i>			

Project design features for building efficiency would help alleviate natural gas demand. In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the three sites, Project impacts related to natural gas would be less than significant.

Transportation Energy Consumption

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding

areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Project's estimated VMT of approximately 4,247,927 million miles per year²⁶⁰, and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpgs²⁶¹, approximately 187,043 gallons of fuel would be required in a year. This would represent less than 0.0001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".²⁶²

²⁶⁰ Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix to the MND.

²⁶¹ California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7,
<http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>.

²⁶² City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.

LADWP's target procurement of energy from renewable resources was 20 percent by 2010. As of 2012, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. LADWP is committed to reach a goal of 35% renewable energy by 2020.²⁶³

With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City's Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California

²⁶³ https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afrcLoop=482029044070877.

Energy Commission (CEC) studied the State's high wind resource potential.²⁶⁴ Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.²⁶⁵ In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

Regulatory Compliance Measures

- RCM-18-8** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.
- RCM-18-9** The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.
- RCM-18-10** The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

²⁶⁴ California Energy Commission. *California Wind Resource Potential*, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.

²⁶⁵ California Energy Commission, *California Solar Resources*, April 2005, <http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF>.

19. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. The Project Site is entirely covered with buildings and surface parking lot. The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Site. The potential impacts will be mitigated to a less than significant level with **Mitigation Measure 4-1**. The Project will have a less than significant impact on historic resources with **Mitigation Measures 5-1** and **5-2** and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft IS/MND.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project’s cumulative impacts. An adequate discussion of a project’s significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the “list” and “plan” approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The Related Projects are detailed in Table 6 and shown in Figure 5 (in Traffic Study, Gibson Transportation Consulting, July 2016, included in the Appendices). The Related Projects include approximately:

- 21,329 residential units (apartments, condominiums)
- 701,008 square feet retail
- 265,129 square feet restaurant and bar
- 1,489,020 square feet office and museum
- 1,571 hotel rooms
- 2,666 student seats
- 38,500 square feet supermarket
- 2,392 theater seats
- 8,000 square feet health club

There are two proposed developments located near the Project Site that were identified by the Project's traffic study.²⁶⁶

- No. 24 – 619 S. Westlake Avenue, 52 apartment units, approximately 350 feet north.
- No. 71 – 1728 W. 7th Street, 9,600 sf restaurant and 3,500 sf bar, approximately 650 feet south.

These Related Projects are not within the immediate vicinity (within a block) of the Project, and there are several intervening buildings between them. The other Related Projects have several intervening buildings and major roadways/freeway in between, and are at least 1,500 feet away or more, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project. Many Related Projects are located beyond the I-110 freeway in Downtown Los Angeles.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate

²⁶⁶ Traffic Study, Gibson Transportation Consulting, July 2016.

area would not be affected by the Project or the nearest Related Project. Development of related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture and Forestry Resources

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. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in the Air Quality section of this MND, above, because the construction-related and operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. None of the Related Projects is close to the Project Site. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the Related Projects and the Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

Biological Resources

The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Project Site. The potential impacts will be mitigated to a less than significant level with **Mitigation Measure 4-1**. The Project would have no impact upon other biological resources. Development of the Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. The Project would not be cumulatively considerable since it is unknown if the Related Projects have potential significant impacts such as tree or habitat removal. Thus, cumulative impacts to biological resources will be less than significant.

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. The Project will have a less than significant impact on historic resources with **Mitigation Measures 5-1** and **5-2** and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. Cumulative impacts on cultural resource will be less than significant.

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the

analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG analysis is a cumulative analysis and thus, there would be no cumulative significant impact. Therefore, the Project would result in a less-than-significant impact related to GHG emissions in the single phase construction scenario. The Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. None of the Related Projects is close to the Project Site. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Land Use

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all related projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. The Project would not make a cumulatively considerable contribution to land use planning, and cumulative impacts would be less than significant. Therefore, cumulative land use impacts would be less than significant.

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

Noise

Development of the Project in conjunction with the Related Projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each Related Project (that has not yet been built) would be localized in nature. None of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from the Related Project, were it to occur concurrently with the Project, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from these sites to the nearby receptors.

Additionally, each of these Related Projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. Each related project would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study (included as an appendix to this MND). Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Population and Housing

The Related Projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles. Any residential related projects would result in direct population growth. The Related Projects that involve residential developments would contribute approximately 21,329 new residential dwelling units to the area, generating approximately 59,934 new

residents.²⁶⁷ The City is expected to increase its population by 199,079 persons between 2010 and 2020. The related project growth would not exceed the projected growth. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. Because the Project would not displace any residents, and the population growth associated with the Project is 1,343 persons, the Project's population growth would not be cumulatively considerable. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by a variety of fire stations (Nos. 3, 4, 9, 10, 11, 13, and 20).²⁶⁸ The Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los

²⁶⁷ The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, *Housing Element, 2013-2021*: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf>.

²⁶⁸ LAFD Fire Station Finder: http://www.lafd.org/fire_stations/find_your_station.

Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

Given the geographic range of the Related Projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the Related Projects is expected to result in a cumulative increase in the demand for school services. Development of the Related Projects include 2,666 student seats and is projected to generate approximately 21,329 new residential dwelling units to the area, which would generate additional demands upon school services. These Related Projects would have the potential to generate students that would attend the same schools as the Project. However each of the projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Cumulative impacts on schools would be less than significant.

Parks and Recreation

Development of the Project in conjunction with the related projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

Library

Given the geographic range of the Related Projects, they would be served by a variety of libraries (Edendale, Echo Park, Chinatown, Little Tokyo, Central, Pico Union).²⁶⁹ Development of the related projects would likely generate additional demands upon library services, however, the Related Projects,

²⁶⁹ LAPL Locations: <http://www.lapl.org/branches>.

like the Project, would contribute to the City General Fund, which goes to, among other things, library services. The LAPL has no plans for new or expanded libraries. Therefore, the cumulative impacts related to library facilities would be less than significant.

Traffic

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing with Project scenario) and a cumulative impact analysis (future baseline with Project scenario). The future includes ambient growth (1 percent per year increase) and the related projects. The future traffic conditions with the Project show that none of the 14 study intersections would have a significant impact in either the existing or future baseline (cumulative) condition (see Section 16, Transportation/Traffic, of this MND). There would be no CMP intersections or freeways impacts. Therefore, the Project's cumulative impact is considered less than significant.

Utilities

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the Related Projects in the City. In addition, several of the Related Projects (Nos. 6, 10, 27, 30, 31, 38, 45, 51, 99, 104, 106) could be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

Wastewater

As shown on Table 3.19-1, Cumulative Estimated Wastewater Generation, it is estimated the Related Projects along with the Project will generate a net total of approximately 3,798,393 gallons per day (gpd) (or 3.8 mgd) of wastewater. The HTP has adequate remaining capacity (88 mgd) to accommodate the Cumulative total. The Project represents 1.6 percent of the cumulative total. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-1
Cumulative (Related Projects + Project) Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential	21,329 units	150 gallons / unit	3,199,350

**Table 3.19-1
Cumulative (Related Projects + Project) Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Retail	701,008 sf	50 gallons / 1,000 sf	35,050
Restaurant	265,129 sf	300 gallons / 1,000 sf	79,539
Office	1,489,020 sf	120 gallons / 1,000 sf	178,682
Hotel	1,571 rooms	120 gallons / room	188,520
School	2,666 students	11 gallons / student	29,326
Market	38,500 sf	120 gallons / 1,000 sf	4,620
Theater	2,392 seats	3 gallons / seat	7,176
Health Club	8,000 sf	650 gallons / 1,000 sf	5,200
Related Projects			3,727,463
Proposed Project			70,930
Cumulative (Related + Project)			3,798,393
<p><i>Note: sf = square feet; gpd = gallons per day</i> <i>Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</i> <i>Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.</i> <i>Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.</i> <i>Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.</i> <i>Table: CAJA Environmental Services, November 2016.</i></p>			

Water

As shown on Table 3.19-2, Cumulative Estimated Water Demand, it is estimated the Related Projects and the Project will demand a net total of approximately 3,798,393 gallons per day (gpd) (or 3.8 mgd) of water. The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer months, respectively) to accommodate the cumulative total. The Project represents 1.6 percent of the cumulative total. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and 652,000 AFY in 2020.²⁷⁰ The cumulative total is approximately 4,250 AFY, which is within the supply of the UWMP and accommodated by any project that conforms to the General Plan and zoning.

²⁷⁰ 2010 Urban Water Management Plan, Los Angeles, pg. 20: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water.jsessionid=b6mMVfCZsTJlyDLQTNnkIHhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?_afLoo p=596574118787894&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoo p%3D596574118787894%26_afWindowMode%3D0%26_adf.ctrl-state%3Dzv72rq95_4.

Related Projects that do not would be required to demonstrate that there is adequate supply, through a Water Supply Assessment for example. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-2
Cumulative (Related Projects + Project) Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Residential	21,329 units	150 gallons / unit	3,199,350
Retail	701,008 sf	50 gallons / 1,000 sf	35,050
Restaurant	265,129 sf	300 gallons / 1,000 sf	79,539
Office	1,489,020 sf	120 gallons / 1,000 sf	178,682
Hotel	1,571 rooms	120 gallons / room	188,520
School	2,666 students	11 gallons / student	29,326
Market	38,500 sf	120 gallons / 1,000 sf	4,620
Theater	2,392 seats	3 gallons / seat	7,176
Health Club	8,000 sf	650 gallons / 1,000 sf	5,200
Related Projects			3,727,463
Proposed Project			70,930
Cumulative (Related + Project)			3, 798,393
<p><i>Note: sf = square feet; gpd = gallons per day</i> <i>Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf</i> <i>Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.</i> <i>Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.</i> <i>Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.</i> <i>Table: CAJA Environmental Services, November 2016.</i></p>			

Solid Waste

As shown on Table 3.19-3, Cumulative Estimated Solid Waste Generation, it is estimated the Related Projects and the Project will generate a net total of approximately 292,804 pounds per day of solid waste (or 146 tons). The Sunshine Canyon landfill has adequate capacity (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday) to accommodate the cumulative total. The Project would not make a cumulatively considerable contribution and a less than significant cumulative impact would occur.

**Table 3.19-3
Cumulative (Related Projects + Project) Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Rates	Total (pounds)
Residential	21,329 units	12.23 pounds / unit	260,854
Retail	701,008 sf	5 pounds / 1,000 sf	3,505
Restaurant	265,129 sf	5 pounds / 1,000 sf	1,326
Office	1,489,020 sf	6 pounds / 1,000 sf	8,934
Hotel	1,571 rooms	4 pounds / room	6,284
School	2,666 students	0.5 pounds / student	1,333
Market	38,500 sf	31.2 pounds / 1,000 sf	1,201
Theater	23,920 sf	31.2 pounds / 1,000 sf	746
Health Club	8,000 sf	31.2 pounds / 1,000 sf	250
Related Projects			284,433
Proposed Project			8,371
Cumulative (Related + Project)			292,804
<i>Note: sf = square feet</i> <i>Rates: CalRecycle Estimated Solid Waste Generation Rates:</i> http://www.calrecycle.ca.gov/wastechar/wastegenrates/ <i>Assume 10 sf per seat.</i> <i>Table: CAJA Environmental Services, November 2016.</i>			

Electricity

The related projects are served by LADWP, same as the Project Site, and thus are counted as part of cumulative analysis. As shown in Table 3.19-4, Cumulative Estimated Electricity Demand, the cumulative projects would demand approximately 171,872,056 kw-h/year (171.9 gw-h/year) of electricity. The LADWP forecasts that in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8.242 gw-h and commercial uses consisting of 12.413 gw-h. The peak demand would be 5,650 megawatts (mw).²⁷¹ The cumulative Related Projects' annual electricity consumption would represent approximately 0.65 percent of the forecasted electricity demand in 2018-19.²⁷² Thus, there is adequate supply capacity to serve the cumulative projects. Thus, the cumulative projects are within the anticipated demand of the LADWP system. In other words, there is adequate energy capacity to service the Project and the related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features

²⁷¹ LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_afdf.ctrl-state=9kjcyeafd_4&_afLoop=1178238919540287.

²⁷² $172 / 26,687 \times 100\% = 0.65\%$.

that could alleviate electrical demand. Each related project would be required to be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each related project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts would be less than significant.

**Table 3.19-4
Cumulative (Related Projects + Project) Estimated Electricity Demand**

Land Use	Size	Electricity Rates	Total (kw-h / yr)
Residential	21,329 units	5,626.5 kw-h / unit	120,007,619
Retail	701,008 sf	13.55 kw-h/sf	9,498,658
Restaurant	265,129 sf	47.45 kw-h / sf	12,580,371
Office	1,489,020 sf	12.95 kw-h / sf	19,282,809
Hotel	628,400 sf	9.95 kw-h / sf	6,252,580
School	25,270 sf	10.50 kw-h / sf	265,335
Market	38,500 sf	13.55 kw-h/sf	521,675
Theater	23,920 sf	13.55 kw-h/sf	323,845
Health Club	8,000 sf	13.55 kw-h/sf	108,400
Related Projects			168,841,292
Proposed Project			3,030,764
Cumulative (Related + Project)			171,872,056
<i>sf = square feet; kw-h = kilowatt-hour; yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/.</i> <i>This analysis assumes 400 square feet per room.</i> <i>School – 95 square feet per student: http://www.cde.ca.gov/ls/fa/sf/completesch.asp</i> <i>Assume 10 sf per seat.</i> <i>Table: CAJA Environmental Services, July 2016.</i>			

Natural Gas

All of the related projects are served by the same natural gas service as the Project (SCG). The Project's contribution to the cumulative natural gas demand would not be substantial. Therefore, Project impacts to natural gas demand would not be cumulatively considerable or significant. These estimates do not account for energy reduction features employed by the Project or related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, each related project would need to be consistent with the

building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

As shown in Table 3.19-5, Cumulative Estimated Natural Gas Demand, the cumulative projects are estimated to demand approximately a net increase of 97 million cf/month of natural gas (or 3.2 million cf/day). The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the cumulative projects' energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2018 is estimated at 3,027 million cf/day. The increase of 3.2 million cf/day represents approximately 0.1 percent of the 2018 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The related projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

**Table 3.19-5
Cumulative (Related Projects + Project) Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Rates	Total (cf / mo)
Residential	21,329 units	4,011.5 cf / unit	85,561,283
Retail	701,008 sf	2.9 cf / mo	2,032,923
Restaurant	265,129 sf	2.9 cf / mo	768,874
Office	1,489,020 sf	2.0 cf / mo	2,978,040
Hotel	628,400 sf	4.8 cf / sf	3,016,320
School	25,270 sf	2.9 cf / mo	73,283
Market	38,500 sf	2.9 cf / mo	111,650
Theater	23,920 sf	2.9 cf / mo	69,368

**Table 3.19-5
Cumulative (Related Projects + Project) Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Rates	Total (cf / mo)
Health Club	8,000 sf	2.9 cf / mo	23,200
Related Projects			94,634,941
Proposed Project			2,390,895
Cumulative (Related + Project)			97,025,836
<i>sf = square feet; cf = cubic feet; mo = month</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/.</i> <i>This analysis assumes 400 square feet per room.</i> <i>Assume 10 sf per seat.</i> <i>Table: CAJA Environmental Services, July 2016.</i>			

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

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

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