



NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

February 20, 2019

ENVIRONMENTAL CASE NO.:	ENV-2018-2771-EIR
PROJECT NAME:	3 rd and Fairfax Mixed-Use Project
PROJECT APPLICANT:	Third Fairfax, LLC
PROJECT ADDRESS:	300-370 South Fairfax Avenue, 6300-6370 West 3 rd Street, and 347 South Ogden Drive, Los Angeles, CA 90036
COMMUNITY PLAN AREA:	Wilshire
COUNCIL DISTRICT:	4 – Ryu
PUBLIC COMMENT PERIOD:	February 20, 2019 – March 22, 2019
SCOPING MEETING:	March 6, 2019, 5:30 P.M. - 7:30 P.M. See below for additional information.

The City of Los Angeles (City) intends to prepare an Environmental Impact Report (EIR) for the proposed 3rd and Fairfax Mixed-Use Project (Project). In accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines, the City has prepared this Notice of Preparation to provide the public, nearby residents and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects. The EIR will be prepared by outside consultants under the supervision of the City of Los Angeles, Department of City Planning.

The City requests your written comments as to the scope and contents of the EIR, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, the City seeks written comments as to the scope and content of the environmental information in the EIR that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR prepared by the City when considering your permit or other approval for the Project.

A Public Scoping Meeting will be held to receive input as to what environmental topics the EIR should study. No decisions about the Project are made at the Public Scoping Meeting. Additional project details, meeting information, and instructions for public comment submittal are listed below.

PROJECT LOCATION AND EXISTING ON-SITE USES: The Project Site is located at 300-370 South Fairfax Avenue, 6300-6370 West 3rd Street, and 347 South Ogden Drive, in the City of Los Angeles, California ("Project Site"), within the Wilshire Community Plan area of the City. The Project Site is comprised of one legal lot defined by the legal description of Tract TR 215, Lot PT 12, and comprised of seven parcels identified by Assessor's Parcel Numbers (APNs) 5509-018-003, -004, -005, -009, -010, -012, -013. The Project Site is generally bounded by West 3rd Street to the north, South Ogden Drive to the east, an elementary school to the south, and South Fairfax Avenue to the west.

The Project Site contains approximately 327,121 square feet of lot area and is currently improved with an approximately 214,736 square-foot retail center known as the Town and Country Shopping Center, which is comprised of five commercial buildings and a surface parking lot.

The Project Site is not included on a list of hazardous materials sites compiled pursuant to California section 65962.5.

(See attached Project Location Map)

PROJECT DESCRIPTION: The Proposed Project includes the partial demolition of an existing surface parking lot and commercial buildings, for up to 151,048 square feet of existing commercial floor area to be demolished (with 63,688 square feet of existing commercial floor area to remain); and the construction of a new mixed-use building containing 331 multi-family residential apartment dwelling units, for approximately 343,000 square feet of new residential floor area, and up to approximately 83,994 square feet of new commercial floor area, all located on the eastern portion of the Project Site. Existing buildings on the western portion of the Project Site are to remain and are not considered part of the Proposed Project work scope, except for calculating overall development rights for the entire Project Site. In conjunction with the existing commercial buildings to remain, the Proposed Project will include approximately 147,682 square feet of commercial retail space and 343,000 square feet of residential space, for a total of 490,682 square feet of development and a Floor Area Ratio (FAR) of 1.5 to 1.

The newly constructed portion of the Proposed Project will consist of a mid-rise, eight-story structure and two levels of subterranean parking, for a maximum height of approximately 100 feet. The residential component will consist of 70 studio units, 162 one-bedroom units, 66 two-bedroom units, and 33 three-bedroom units. The Proposed Project would provide a maximum of 1,156 automobile parking spaces, comprised of 982 spaces within the mixed-use building, and 174 spaces within the existing surface parking lot to remain. In addition, a total of 257 bicycle parking spaces, comprised of 57 short- and 200 long-term bicycle parking spaces, will be provided pursuant to the LAMC. Vehicular access to the Project Site will be provided via four driveways, which include two new driveways (one residential and one commercial) with access to the parking areas for the new mixed-use building along South Ogden Drive, and two existing driveways along South Fairfax Avenue and West 3rd Street with access to the surface parking lot.

The Proposed Project will include up to 37,225 square feet of open space, including 5,640 square feet of indoor amenity space and approximately 31,585 square feet of common outdoor open space. Open space will be provided through residential amenity decks located on the fourth floor, the fifth floor, and on the roof level. Landscaping will be provided at these amenity decks, and also around the surface parking lot and edges of the Project Site.

Existing Uses

Existing Uses	Size
Commercial Land Uses	
Drug Store/Pharmacy	14,496 sf
SW Corner Store	1,746 sf
Grocery Store	28,655 sf
Storage Shed	900 sf
Patio Shops West	11,449 sf
Corner Pad Buildings (Bank)	6,442 sf
Patio Shops East ^a	19,175 sf
K-Mart	131,873 sf
Total Commercial	214,736 sf
^a <i>Patio Shops East includes 13,090 square feet of retail and 6,085 square feet of restaurant space.</i>	

Proposed Uses

Proposed Uses	Maximum Size
Commercial Land Uses	
Commercial/Retail (to be demolished)	(151,048 sf)
Commercial/Retail (to remain)	63,688 sf
New Commercial/Retail	83,994 sf
Total Commercial	147,682 sf
Residential Land Uses	
Studio	70 units
1-bedroom	162 units
2-bedroom	66 units
3-bedroom	33 units
Total Residential	331 units 343,000 sf*
TOTAL FLOOR AREA (Floor Area Ratio)	490,682 sf (1.5:1)
<i>* Includes amenity and residential lobby/leasing area.</i>	

REQUESTED ACTIONS: The Applicant requests the following entitlements from the City of Los Angeles:

1. Site Plan Review for a Project that will result in an increase of more than 50 dwelling units.
2. Preliminary Parcel Map for the division of land in order to create two airspace lots, approval of a Waiver of Dedication and Improvements to waive all dedication requirements along South Fairfax Avenue, West 3rd Street and South Ogden Drive, and approval of a haul route for the export of approximately 86,500 cubic yards of soil.
3. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project, including permits to remove on-site and off-site trees, demolition permits, haul route approval, grading and associated building permits. Other responsible governmental agencies may also serve as a responsible agency for certain discretionary approvals associated with the construction process, which include, but are not limited to the South Coast Air Quality Management District (construction-related air quality emissions), California Department of Conservation, Division of Oil, Gas and Geothermal Resources, and the Regional Water Quality Control Board, Los Angeles Region (construction-related water quality).

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on an Initial Study, the proposed project could have potentially significant environmental impacts in the following topic areas, which will to be addressed in the EIR: Air Quality, Cultural Resources (Archaeological Resources), Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Noise, Population and Housing, Public Services (Fire, Police, Schools, Parks, and Libraries), Recreation, Transportation, Tribal Cultural Resources, and Utilities/Service Systems (Water, Wastewater, Energy Use, and Solid Waste).

PUBLIC SCOPING MEETING: A Public Scoping Meeting will be held in **an open house format** to share information regarding the Project and the environmental review process and to receive written public comments regarding the scope and content of the environmental analysis to be addressed in the EIR. City staff, environmental consultants, and project representatives will be available, but no formal presentation is scheduled. You may stop by at any time during the hours listed below to view materials, ask questions, and provide written comments. The City encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. No decisions about the Project will be made at the Public Scoping Meeting. A separate public

hearing for Municipal Code entitlement requests, will be scheduled after the completion of the EIR. The date, time, and location of the Public Scoping Meeting are as follows:

Date: Wednesday, March 6, 2019
Time: 5:30 P.M.–7:30 P.M.
Location: Pan Pacific Senior Activity Center
141 South Gardener Street
Los Angeles, CA 90036

Free Parking is Available On-Site

FILE REVIEW AND COMMENTS: The enclosed materials reflect the scope of the Project. The environmental file is available for public review at the City of Los Angeles, Department of City Planning, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012, during office hours Monday - Friday, 9:00 a.m. - 4:00 p.m. To review the file, please contact the Staff Planner listed below to schedule an appointment. A copy of this notice and the Initial Study prepared for the Project may be viewed with the environmental file or online at <http://planning.lacity.org> by clicking on the “Environmental Review” tab, then “Notice of Preparation & Public Scoping Meetings”, and then clicking on the document links below the Project title.

The City will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR. If you wish to submit comments, please reference the Environmental Case No. above, and submit them in writing by **Friday, March 22, 2019, no later than 4:00 p.m.** Written comments will also be accepted at the Public Scoping Meeting described above. Please direct your comments to:

Mail: Mindy Nguyen
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

E-mail: mindy.nguyen@lacity.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability. The Public Scoping Meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon written request submitted a minimum of seven (7) working days in advance to: per.planning@lacity.org. Be sure to identify the language you need English to be translated into, and indicate if the request is for oral or written translation services. If translation of a written document is requested, please include the document to be translated as an attachment to your email.

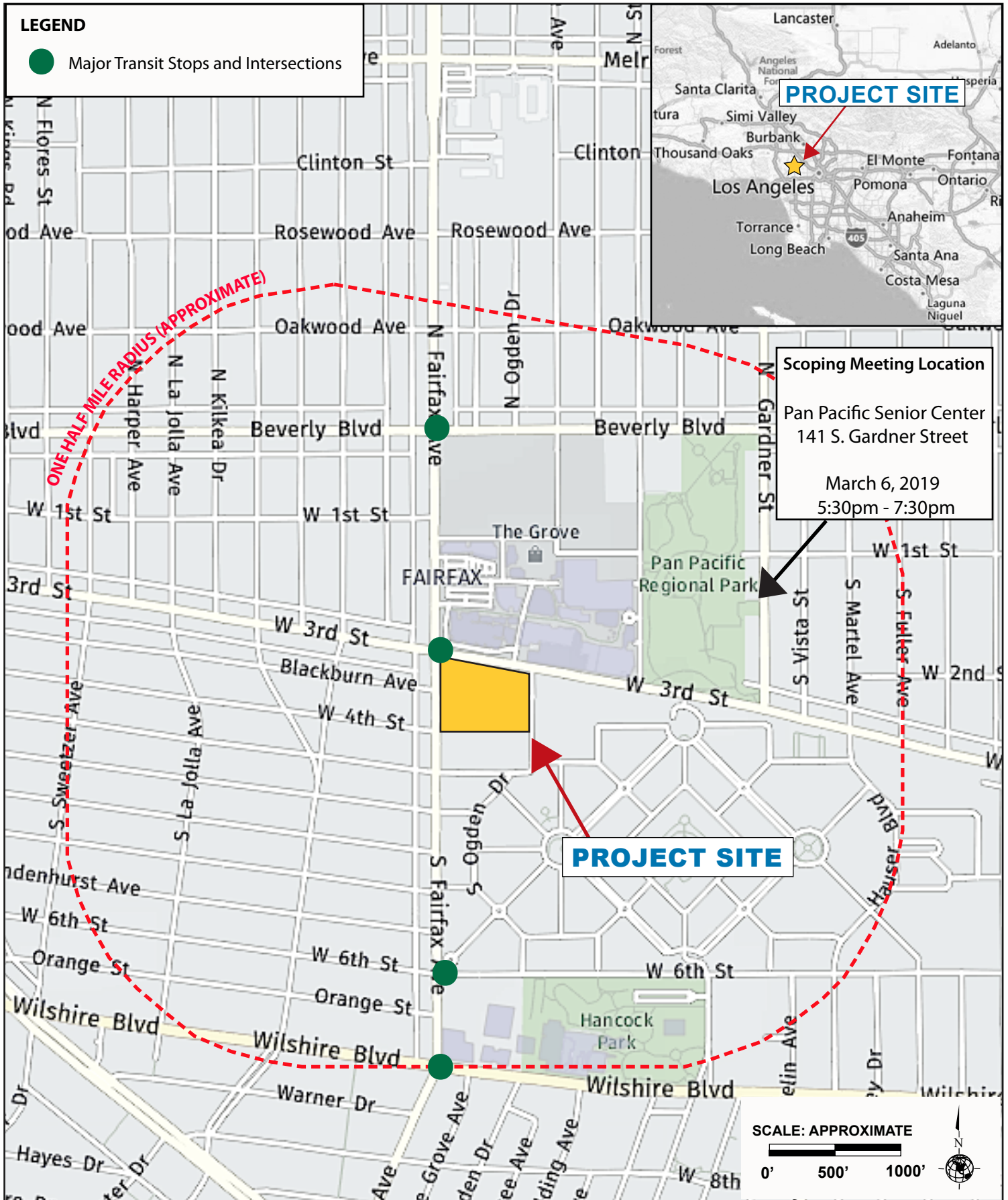
VINCENT P. BERTONI, AICP
Director of Planning

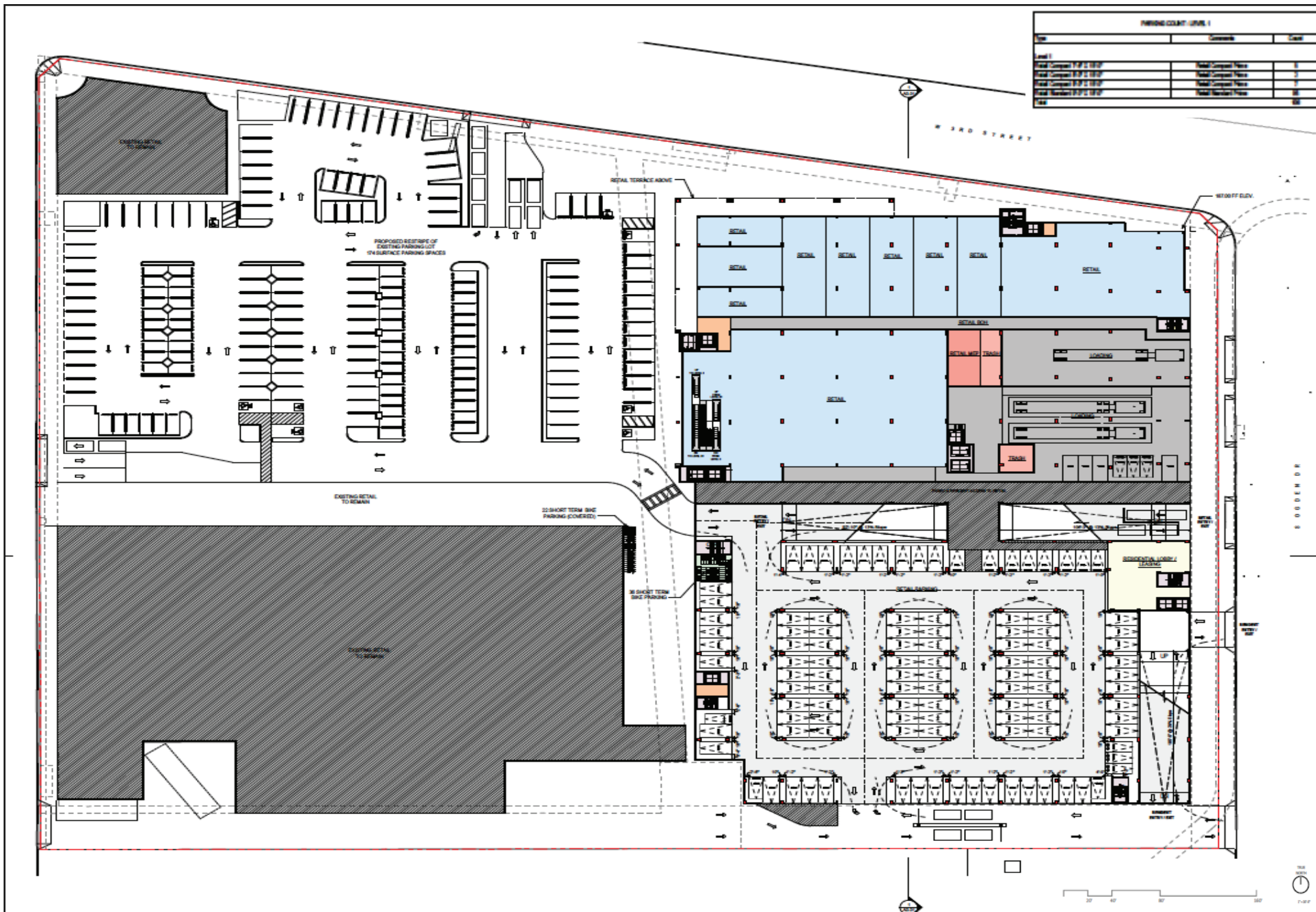
Mindy Nguyen
Major Projects Section
Department of City Planning
(213) 847-3674

Attachments:

Figure 1: Project Location Map
Figure 2: Proposed Site Plan

Puede obtener información en Español acerca de esta junta llamando al (213) 978-1300.





Source: MVE + Partners, January 16, 2019.

3rd and Fairfax Mixed-Use Project

Case Number: ENV-2018-2771-EIR

Project Location: 300-370 South Fairfax Avenue; 6300-6370 West 3rd Street; and 347 South Ogden Drive, Los Angeles, California 90036

Community Plan Area: Wilshire

Council District: 4 - Ryu

Project Description: The Project Site is currently improved with an approximately 214,736 square-foot retail center known as the Town and Country Shopping Center, located on an approximately 327,121 square-foot site. The Proposed Project includes the partial demolition of an existing surface parking lot and commercial buildings, for up to 151,048 square feet of existing commercial floor area to be demolished (with 63,688 square feet of existing commercial floor area to remain); and the construction of a new mixed-use building containing 331 multi-family residential apartment dwelling units, for approximately 343,000 square feet of new residential floor area, and up to approximately 83,994 square feet of new commercial floor area, all located on the eastern portion of the Project Site. Existing buildings on the western portion of the Project Site are to remain and are not considered part of the Project work scope, except for calculating overall development rights for the entire Project Site. In conjunction with the existing commercial buildings to remain, the Project will include approximately 147,682 square feet of commercial retail space, for a total of 490,682 square feet of development and a Floor Area Ratio (FAR) of 1.5 to 1.

The Project will consist of a mid-rise, eight-story structure and two levels of subterranean parking, for a maximum height of approximately 100 feet. The residential component will consist of 70 studio units, 162 one-bedroom units, 66 two-bedroom units, and 33 three-bedroom units.

The Project would provide a maximum of 1,156 automobile parking spaces, comprised of 982 spaces within the mixed-use building, and 174 spaces within the existing surface parking lot to remain. Short- and long-term bicycle parking will be provided pursuant to the Los Angeles Municipal Code (LAMC). Vehicular access to the Project Site will be provided via four driveways, which include two new driveways (one residential and one commercial) with access to the parking areas for the new mixed-use building along South Ogden Drive, and two existing driveways along South Fairfax Avenue and West 3rd Street with access to the surface parking lot.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Parker Environmental Consultants, LLC

APPLICANT:

Third Fairfax, LLC

February 2019

INITIAL STUDY

TABLE OF CONTENTS

	<u>Page</u>
1 INTRODUCTION	5
1.1 PURPOSE OF AN INITIAL STUDY	5
1.2 ORGANIZATION OF THE INITIAL STUDY	6
1.3 CEQA PROCESS	6
1.3.1 Initial Study	6
1.3.2 Draft EIR	6
1.3.3 Final EIR	7
2 EXECUTIVE SUMMARY	8
3 PROJECT DESCRIPTION	13
3.1 Project Summary	13
3.2 Environmental Setting	13
3.2.1 Project Location	13
3.2.2 Zoning and Land Use Designations	16
3.2.3 Existing Conditions	19
3.2.4 Surrounding Land Uses	20
3.3 Description Of Project	26
3.3.1 Project Overview	26
3.3.2 Building Design	29
3.3.3 Open Space and Recreational Amenities	29
3.3.4 Access, Circulation, and Public Transportation	32
3.3.5 Parking	33
3.3.6 Signage and Lighting	35
3.3.7 FAR, Density, and Setbacks	35
3.3.8 Sustainability Features	35
3.3.9 CEQA Guidelines Appendix F	36
3.3.10 Project Construction and Scheduling	37
3.4 Requested Permits And Approvals	38
3.5 Interim Site Improvements	39
4 ENVIRONMENTAL IMPACT ANALYSIS	40
I. Aesthetics	40
II. Agriculture And Forestry Resources	43
III. Air Quality	45

IV. Biological Resources.....	47
V. Cultural Resources.....	50
VI. Energy.....	57
VII. Geology And Soils.....	58
VIII. Greenhouse Gas Emissions	66
IX. Hazards And Hazardous Materials	67
X. Hydrology And Water Quality.....	72
XI. Land Use And Planning	77
XII. Mineral Resources	79
XIII. Noise	80
XIV. Population And Housing	82
XV. Public Services	83
XVI. Recreation	85
XVII. Transportation.....	86
XVIII. Tribal Cultural Resources	88
XIX. Utilities And Service Systems.....	90
XX. Wildfire.....	92
XXI. Mandatory Findings Of Significance	93

List of Figures

Figure A-1 Project Location Map.....	14
Figure A-2 Zoning and General Plan Land Use Designations.....	17
Figure A-3 Aerial Photograph of the Project Site and Surrounding Land Uses.....	21
Figure A-4 Photographs of the Project Site, Views 1-6	22
Figure A-5 Photographs of the Project Site, Views 7-12	23
Figure A-6 Photographs of the Surrounding Land Uses, Views 13-18.....	24
Figure A-7 Photographs of the Surrounding Land Uses, Views 19-22.....	25
Figure A-8 Existing Conditions and Demolition Plan.....	27
Figure A-9 Level One Floor Plan.....	28
Figure A-10 Building Sections	30
Figure A-11 3-D Massing Views	31

List of Tables

Table 1 Summary of Project Site Area	15
Table 2 Proposed Development Program	26
Table 3 Summary of Required and Proposed Open Space Areas	32
Table 4 Summary of Required and Proposed Vehicle Parking Spaces	34
Table 5 Summary of Required and Proposed Bicycle Parking Spaces	34

List of Appendices

Appendix A	Protected Tree Report
Appendix B	Historic Resources Report
Appendix C	Archaeological Resources Assessment
Appendix D	Paleontological Resources Assessment
Appendix E	Geotechnical Investigation
Appendix F-1	Asbestos and Lead Survey
Appendix F-2	Hazardous Waste Inventory
Appendix F-3	Phase I Environmental Site Assessment
Appendix F-4	Phase II Environmental Site Assessment
Appendix F-5	Methane Report
Appendix G	Hydrology and Water Quality Technical Report

INITIAL STUDY

1 INTRODUCTION

An application for the proposed 3rd and Fairfax Project (“Proposed Project”) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Proposed Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study (IS) evaluates potential environmental effects resulting from construction, implementation, and operation of the Proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Proposed Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and EIR is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Proposed Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

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

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the Proposed Project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation

measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues are prepared.

1.3.3 Final EIR

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

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

If the Proposed Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the Proposed Project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	3RD AND FAIRFAX MIXED-USE PROJECT
ENVIRONMENTAL CASE NO.	ENV-2018-2771-EIR
RELATED CASES	DIR-2018-2770-SPR; AA-2018-2768

PROJECT LOCATION	300-370 SOUTH FAIRFAX AVENUE; 6300-6370 WEST 3 RD STREET; AND 347 SOUTH OGDEN DRIVE, LOS ANGELES, CA, 90036
COMMUNITY PLAN AREA	WILSHIRE
GENERAL PLAN DESIGNATION	COMMUNITY COMMERCIAL
ZONING	C2-1-O
COUNCIL DISTRICT	4 - RYU

LEAD CITY AGENCY	City of Los Angeles Department of City Planning
STAFF CONTACT	MINDY NGUYEN, CITY PLANNER
ADDRESS	221 NORTH FIGUEROA STREET, SUITE 1350 LOS ANGELES, CA 90012
PHONE NUMBER	(213) 847-3674
EMAIL	MINDY.NGUYEN@LACITY.ORG

APPLICANT	3RD FAIRFAX, LLC C/O TOM WARREN
ADDRESS	5000 EAST SPRING STREET, SUITE 500 LONG BEACH, CA 90815
PHONE NUMBER	(562) 285-5300

PROJECT DESCRIPTION

The Project Site is currently improved with an approximately 214,736 square-foot retail center known as the Town and Country Shopping Center, located on an approximately 327,121 square-foot site. The Proposed Project includes the partial demolition of an existing surface parking lot and commercial buildings, for up to 151,048 square feet of existing commercial floor area to be demolished (with 63,688 square feet of existing commercial floor area to remain); and the construction of a new mixed-use building containing 331 multi-family residential apartment dwelling units, for approximately 343,000 square feet of new residential floor area, and up to approximately 83,994 square feet of new commercial floor area, all located on the eastern portion of the Project Site. Existing buildings on the western portion of the Project Site are to remain and are not considered part of the Proposed Project work scope, except for calculating overall development rights for the entire Project Site. In conjunction with the existing commercial buildings to remain, the Proposed Project will include approximately 147,682 square feet of commercial retail space, for a total of 490,682 square feet of development and a Floor Area Ratio (FAR) of 1.5 to 1.

The Proposed Project will consist of a mid-rise, eight-story structure and two levels of subterranean parking, for a maximum height of approximately 100 feet. The residential component will consist of 70 studio units, 162 one-bedroom units, 66 two-bedroom units, and 33 three-bedroom units.

The Proposed Project would provide a maximum of 1,156 automobile parking spaces, comprised of 982 spaces within the mixed-use building, and 174 spaces within the existing surface parking lot to remain. Short- and long-term bicycle parking will be provided pursuant to the Los Angeles Municipal Code (LAMC). Vehicular access to the Project Site will be provided via four driveways, which include two new driveways (one residential and one commercial) with access to the parking areas for the new mixed-use building along South Ogden Drive, and two existing driveways along South Fairfax Avenue and West 3rd Street with access to the surface parking lot.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

ENVIRONMENTAL SETTING

The Project Site is located within the boundaries of the Wilshire Community Plan area, comprised of one legal lot, which includes Assessor’s Parcel Numbers (APNs) 5509-018-003, 5509-018-004, 5509-018-005, 5509-018-009, 5509-018-010, 5509-018-012, and 5509-018-013, and legally described as Lot PT 12 of Tract TR 215.

The Project Site is generally bounded by South Fairfax Avenue to the west; West 3rd Street to the north; a private driveway followed by an elementary school to the south; and South Ogden Drive followed by a retail store to the east. The Project Site includes approximately 327,121 square feet of lot area (7.51 acres). The Project Site consists of five (5) commercial/retail buildings with a total floor area of approximately 214,736 square feet. Existing uses on-site include a pharmacy, a grocery store, retail shops, restaurants, department stores, and a bank. The remainder of the Project Site is paved surface parking. One driveway on the east side of South Fairfax Avenue, two driveways on the south side of West 3rd Street, one driveway on the west side of South Ogden Drive, and the private driveway on the south side of the Project Site provide access to the Project Site. Vegetation on the Project Site is limited to 13 non-protected trees. Additionally, there are three street trees in the public right-of-way (two fronting South Fairfax Avenue and one fronting West 3rd Street).

The Project Site is zoned C2-1-O, with a General Plan land use designation of Community Commercial. The Project Site is designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452. The "O" Zone designation indicates a Supplement Use District for oil drilling, specifically the Salt Lake Oil Field. Two oil wells are located on the Project Site, but have been plugged and abandoned. The Project Site is also located in the State of California (Division of Oil and Gas) Approval area per the Department of City Planning's Zoning Information File ZI No. 1195, which requires approval and clearance by the Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR), prior to permit issuance for the Proposed Project.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

To be determined, as applicable.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes. The City notified the California Native American tribes and the Gabrieleno Band of Mission Indians-Kizh Nation requested consultation, which has been initiated and is ongoing.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Mindy Nguyen
PRINTED NAME

City Planner
TITLE


SIGNATURE

February 20, 2019
DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

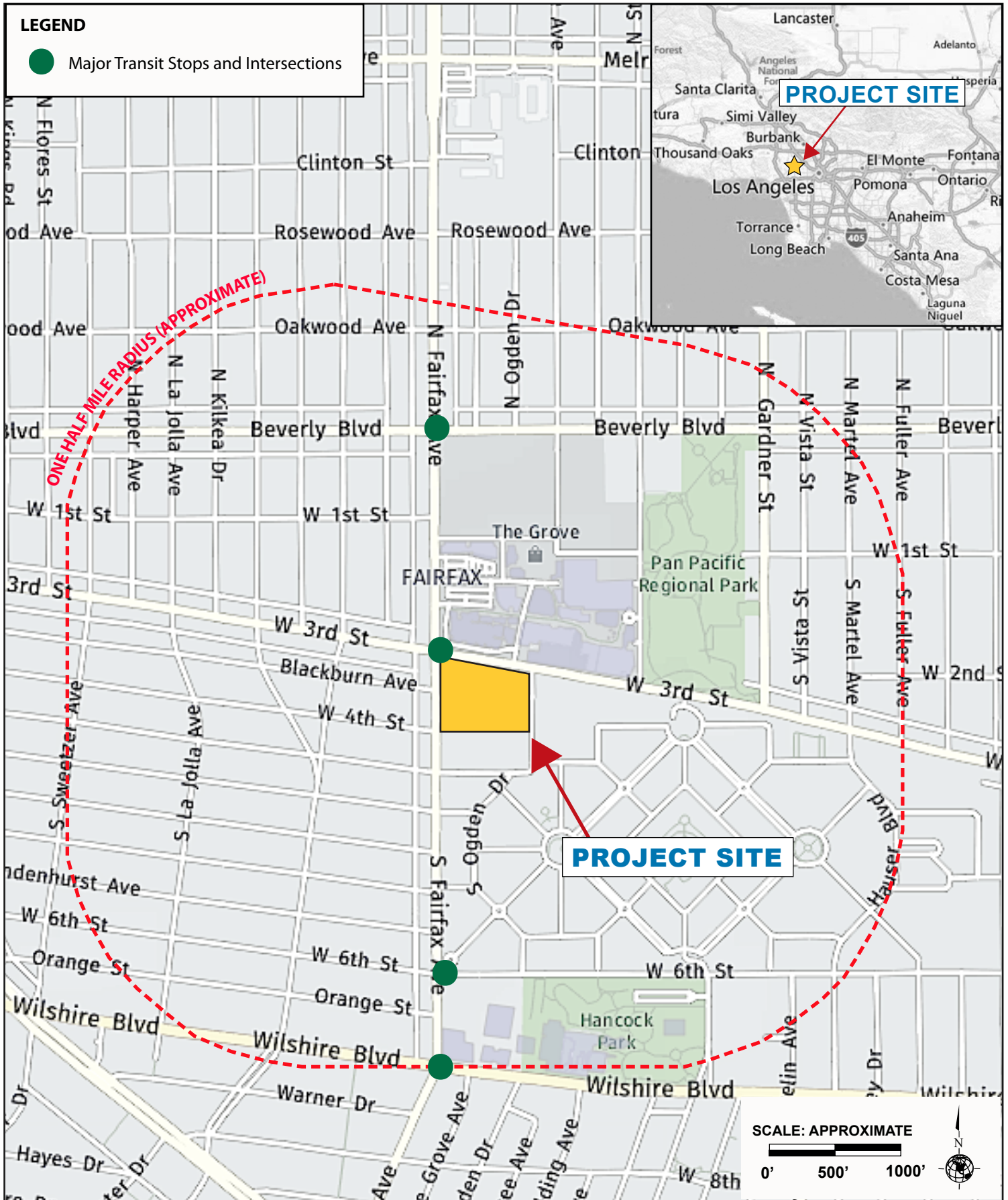
The Project Site is currently improved with an approximately 214,736 square-foot retail center known as the Town and Country Shopping Center, located on an approximately 327,121 square-foot site. The Proposed Project includes the partial demolition of an existing surface parking lot and commercial buildings, for up to 151,048 square feet of existing commercial floor area to be demolished (with 63,688 square feet of existing commercial floor area to remain); and the construction of a new mixed-use building containing 331 multi-family residential apartment dwelling units, for approximately 343,000 square feet of new residential floor area, and up to approximately 83,994 square feet of new commercial floor area, all located on the eastern portion of the Project Site. Existing buildings on the western portion of the Project Site are to remain and are not considered part of the Proposed Project work scope, except for calculating overall development rights for the entire Project Site. In conjunction with the existing commercial buildings to remain, the Proposed Project will include approximately 147,682 square feet of commercial retail space and 343,000 square feet of residential space, for a total of 490,682 square feet of development and a Floor Area Ratio (FAR) of 1.5 to 1.

The newly constructed portion of the Proposed Project will consist of a mid-rise, eight-story structure and two levels of subterranean parking, for a maximum height of approximately 100 feet. The residential component will consist of 70 studio units, 162 one-bedroom units, 66 two-bedroom units, and 33 three-bedroom units. The Proposed Project would provide a maximum of 1,156 automobile parking spaces, comprised of 982 spaces within the mixed-use building, and 174 spaces within the existing surface parking lot to remain. Short- and long-term bicycle parking will be provided pursuant to the Los Angeles Municipal Code (LAMC). Vehicular access to the Project Site will be provided via four driveways, which include two new driveways (one residential and one commercial) with access to the parking areas for the new mixed-use building along South Ogden Drive, and two existing driveways along South Fairfax Avenue and West 3rd Street with access to the surface parking lot.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

As shown in Figure A-1 on page A-2, the Project Site is located at 300-370 South Fairfax Avenue; 6300-6370 West 3rd Street; and 347 South Ogden Drive in the City of Los Angeles, California; and within the boundaries of the Wilshire Community Plan area. The Project Site is comprised of one legal lot, which includes seven Assessor's Parcel Numbers (APN) 5509-018-003, 5509-018-004, 5509-018-005, 5509-018-009, 5509-018-010, 5509-018-012, and 5509-018-013, and legally described as Lot PT 12 of Tract TR 215. The Project Site includes approximately 327,121 square feet of lot area (7.51 acres). The Project Site's property addresses, APN and land uses are summarized in Table 1, Summary of Project Site Area. The



Source: Yahoo Maps, 2018.

**Table 1
Summary of Project Site Area**

Addresses	APN	Existing Land Use
No Address	5509-018-003	Surface parking lot
No Address	5509-018-004	Surface parking lot
300 S. Fairfax Avenue	5509-018-005	One-story commercial/retail building
347 S. Ogden Drive 370 S. Fairfax Avenue 6300-6302 W. 3 rd Street 6310-6328 W. 3 rd Street 6332-6360 W. 3 rd Street 6370 W. 3 rd Street	5509-018-009	One-story commercial/retail building with outdoor patio
No Address	5509-018-010	Private Driveway
No Address	5509-018-012	One-story commercial/retail building
No Address	5509-018-013	One-story commercial/retail building
Source: City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org , accessed June 2018. MVE+ Partners, January 23, 2019.		

Project Site is generally bounded by West 3rd Street to the north, South Ogden Drive to the east, an elementary school to the south, and South Fairfax Avenue to the west.

Regional and Local Access

Primary vehicular access to the Project Site is provided by the Santa Monica Freeway (I-10) located approximately 2.5 miles to the south and the Hollywood Freeway (US-101) located approximately three miles to the northwest of the Project Site. The City's Mobility Element of the General Plan (Mobility Plan 2035) classifies street designations in the project vicinity. Primary street access is provided by South Fairfax Avenue, West 3rd Street, and South Ogden Drive. South Fairfax Avenue, which borders the Project Site to the west, is a two-way street providing two travel lanes in each direction. South Fairfax Avenue is classified as an Avenue II roadway in the Mobility Plan 2035. 3rd Street, which borders the Project Site to the north, is a two-way street providing two to three travel lanes in each direction. West 3rd Street is designated as an Avenue II roadway in the Mobility Plan 2035. South Ogden Drive, which borders the Project Site to the east, is a two-way street providing one travel lane in each direction. South Ogden Drive is designated as a Local Street - Standard in the Mobility Plan 2035. Street parking is provided along South Fairfax Avenue with some restrictions. Other local streets include Wilshire Boulevard, located approximately 0.5 mile to the south; La Brea Avenue, located approximately 0.9 mile to the east; Beverly Boulevard, located 0.3 miles to the north; and La Cienega Boulevard, located approximately 0.9 mile to the west.

The roadways adjacent to the Project Site are served by several bus lines managed by Metro and LADOT DASH, which provide transfer opportunities to Foothill Transit lines, Montebello Bus lines, and Orange County Transportation Authority ("OCTA") lines. Metro bus lines that service the Project area include the Metro Rapid bus line 780, located on South Fairfax Avenue; and Metro

local bus lines 16 and 316, located on West 3rd Street. Other Metro local bus lines not defined as a major bus route include: Metro line 217, 281, and 17. Additionally, the Project Site is also served by LADOT DASH Fairfax bus route, which includes a stop adjacent to the Project Site and provides service throughout the Mid-City West community.

3.2.2 Zoning and Land Use Designations

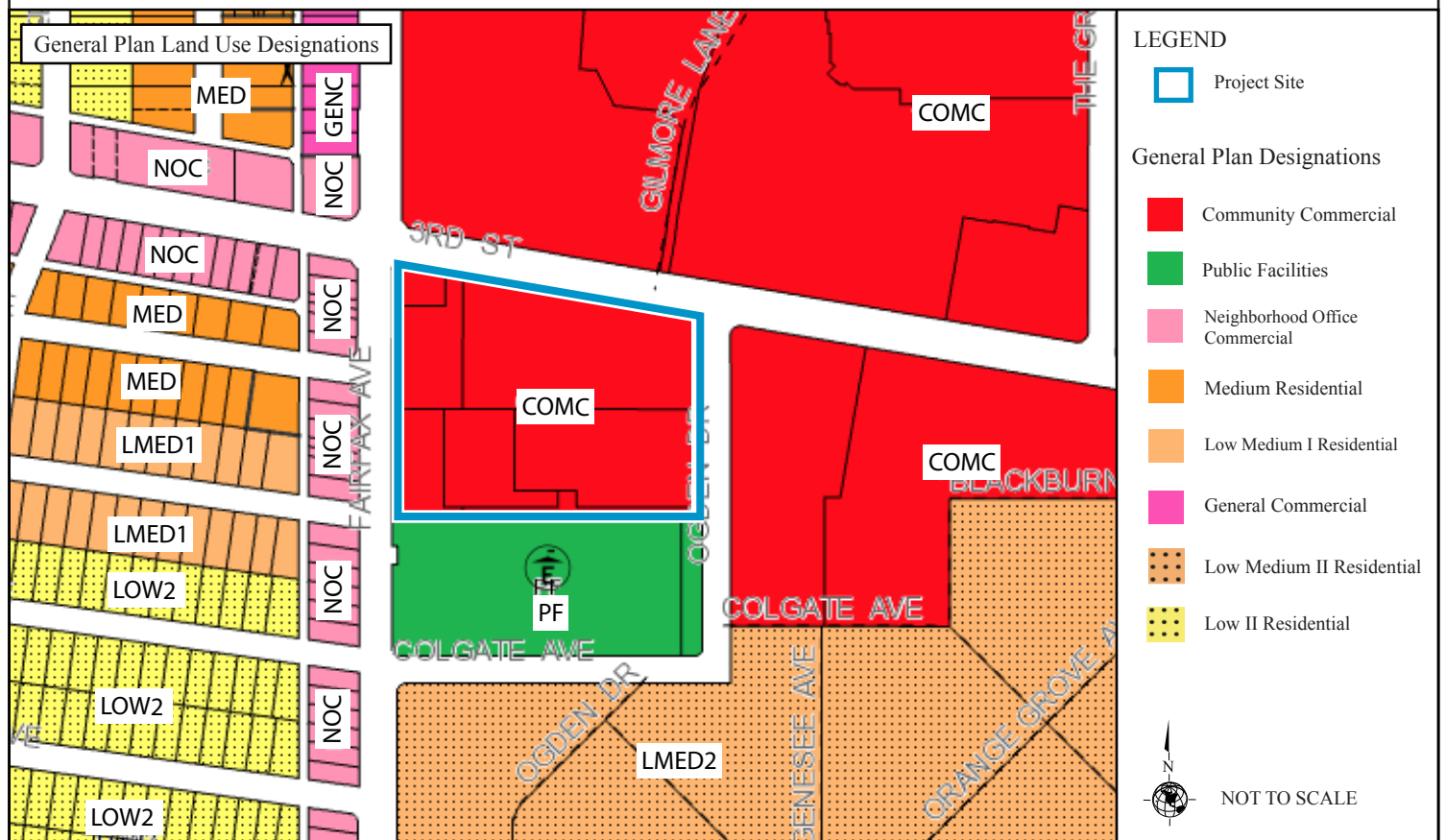
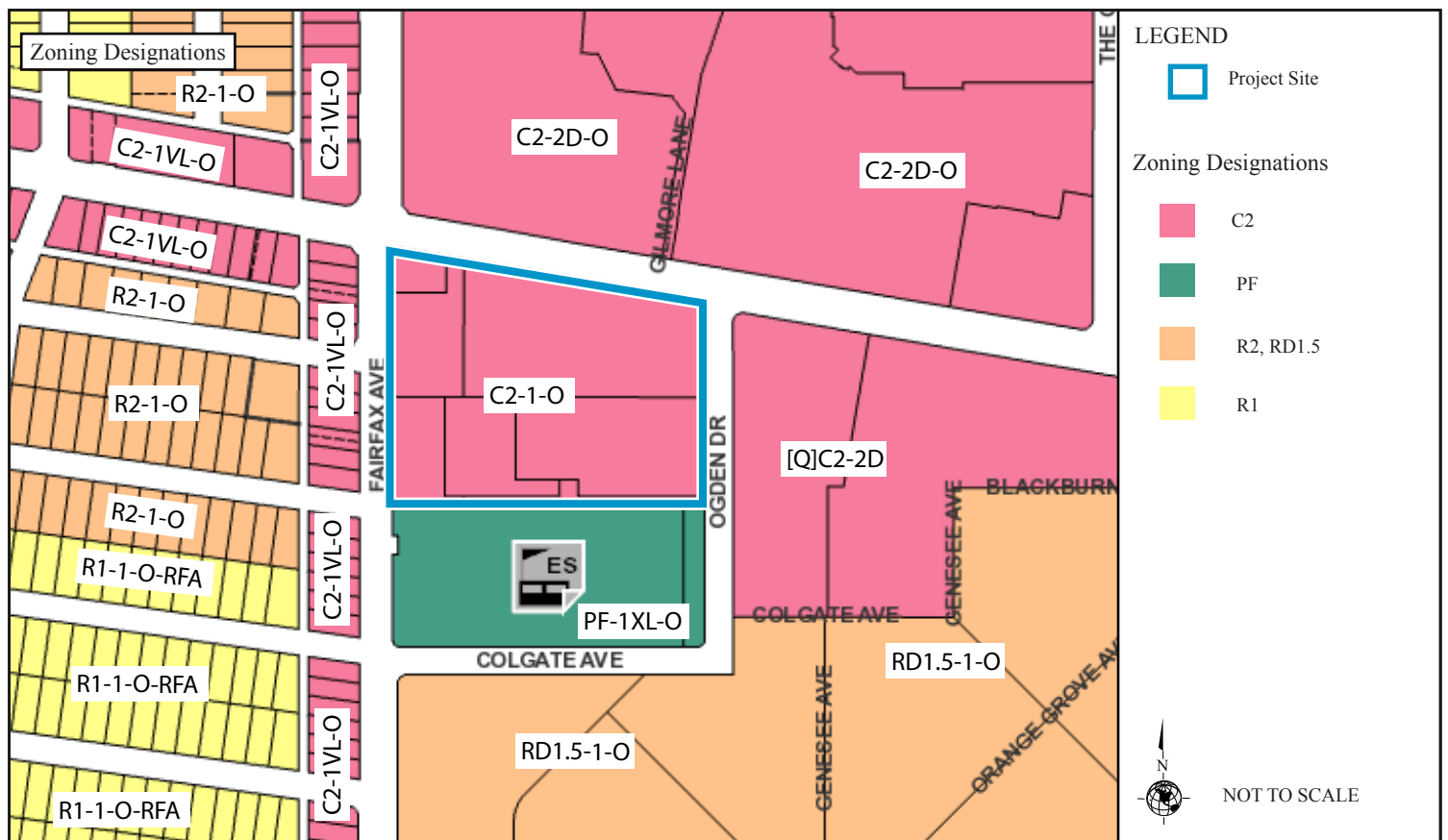
City of Los Angeles Municipal Code

The LAMC sets specific requirements and standards for development projects within the City, such as zoning laws, construction standards, open space, and parking requirements. The LAMC is amended by ordinances and is enforced by the City. The Project Site is located in the C2-1-O (Commercial) Zone with a General Plan land use designation of Community Commercial. The C2 Zone permits C1.5 uses, retail with limited manufacturing, service stations and garages, churches, schools, auto sales, and R4 uses. Pursuant to LAMC Section 12.13.5, residential uses associated with an R4 Zone (multi-family) are permitted in the C2 Zone provided that all regulations of the R4 Zone are complied with.

There is no building height limit for the underlying C2 zone. The “-1” designation indicates that the Project Site is located in Height District 1, which, according to LAMC Section 12.21.1, does not specify a maximum height and prohibits the total floor area from exceeding 1.5 times the buildable area of the lot. The Project Site includes approximately 327,121 square feet of lot area (7.51 acres). Pursuant to the LAMC, the allowable FAR on-site is 1.5:1, which would allow a total floor area of approximately 490,682 square feet. The Proposed Project would include a total of 426,994 square feet of new construction and 63,688 square feet of existing commercial retail to remain on-site, for a total of 490,682 square feet with a corresponding FAR of 1.5:1. Figure A-2, Zoning and General Plan Land Use Designations, shows the existing zoning for the Project Site and the parcels surrounding the Project Site.

Transit Priority Area (ZI No. 2452)

In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “Major Transit Stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21061.3 defines an “Infill Site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.



Source: Zimas, City of Los Angeles, Department of City Planning, 2018.

The Project Site is an infill site within a Transit Priority Area as defined by Senate Bill 743 (SB 743).² The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (“Metro”) and City Department of Transportation (“LADOT”). Specifically, major bus routes that serve the Project Site include the Metro Rapid bus line 780, located on South Fairfax Avenue; and Metro local bus lines 16 and 316, located on West 3rd Street. Other Metro local bus lines not defined as a major bus route include: Metro Lines 217, 281, and 17. Additionally, the Project Site is also served by LADOT DASH Fairfax bus route, which includes a stop adjacent to the Project Site and provides service throughout the Mid-City West community. The Project Site is also situated within easy walking distance to retail, restaurants, and other commercial businesses located in the Wilshire area and in particular along Wilshire Boulevard.

Department of Conservation, Division of Oil & Gas Clearance (ZI No. 1195)

The Project Site is also located in the State of California (Division of Oil and Gas) Approval area per the Department of City Planning’s Zoning Information File ZI No. 1195, which requires approval and clearance by the Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR), prior to permit issuance for the Proposed Project. Clearance would include filing a construction site review application. The Project Site is located in an oil-drilling field, specifically the Salt Lake Oil Field. Two oil wells are located on the Project Site (Chevron USA Well No. 99 and 102), but have been plugged and abandoned.³ No oil drilling activities currently occur on the Project Site.⁴

City of Los Angeles General Plan

Whereas the LAMC is an overarching document that provides specific requirements and standards for all aspects of living, working, and city function (including development) within the City, the City of Los Angeles General Plan (“General Plan”) is a comprehensive, long-range declaration of purposes, policies, and programs to guide future development and growth within the City. The General Plan is a dynamic document consisting of 11 elements, which include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element (Mobility Plan 2035), a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 Community Plans.⁵ The elements that would be most applicable to the Proposed Project are the Housing Element, the Mobility Plan 2035, and the Land Use Element. As shown in Figure A-2, Zoning and General Plan Land Use Designations, the General Plan land use designation for the Project Site is Community Commercial, which corresponds with the C2 Zone.

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan (“Community Plan”) area of the City of Los Angeles. The Community Plan sets forth planning goals, objectives, policies, programs, and design guidelines that pertain to the Wilshire Community. Broader planning issues, goals, objectives and policies are provided by the Citywide General Plan through its Framework

² City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed December 2016.

³ State of California, Department of Conservation, Division of Oil, Gas, & Geothermal Resources (DOGGR) Well Finder, website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed April 2018.

⁴ City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed June 2018.

⁵ City of Los Angeles, Department of City Planning, General Plan Elements, website: https://planning.lacity.org/GP_elements.html, accessed June 2018.

Element. The Community Plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. According to the Community Plan, the area is characterized by low to medium density residential uses with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major boulevards including Wilshire, Pico and La Cienega Boulevards; and Western and Vermont Avenues. The plan area east of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center.

The principal method for the implementation of the Wilshire Community Plan Maps, particularly the land use map, is the City Zoning Code. Together, the City Zoning Code and the City Zoning Maps identify the specific types of land use and development standards applicable to specific areas and parcels of land within the Wilshire Community Plan Area.⁶

3.2.3 Existing Conditions

As shown in Figure A-3 on page A-9, the Project Site is currently developed with five (5) commercial and retail buildings with an associated surface parking lot containing 485 spaces. The existing structures on the Project Site have a combined floor area of approximately 214,736 square feet. On the western portion of the Project Site, a one-story building, containing approximately 54,600 square feet, is occupied by a pharmacy and grocery store. South of the one-story building is another one-story building containing approximately 2,646 square feet, is occupied by a corner store and storage shed. The one-story buildings in the center of the plaza contain approximately 30,623 square feet, is occupied by 13,089 square feet of patio retail shops and 6,085 square feet of restaurant space. To the east, the two-story building with a basement contains approximately 131,873 square feet, is occupied by a commercial retail use (currently a Kmart store). In addition, there is a one-story bank, containing approximately 6,442 square feet, located at the northwest corner; and an outdoor patio and a private loading driveway at the southern portion of the Project Site. The remainder of the Project Site is paved surface parking.

Vehicular access to the Project Site is provided via two driveways on the east side of South Fairfax Avenue (one providing access to the main parking lot and one to the loading driveway), two driveways on the south side of West 3rd Street (providing access to the main parking lot), and one driveway on the west side of South Ogden Drive (providing access to the loading driveway). Photographs of the Project Site are shown in Figure A-4 and Figure A-5.

Vegetation on the Project Site is limited to 13 trees (five Canary Pine, one Aleppo Pine, and seven Mexican Fan Palm species) on the Project Site. In addition, there are three street trees (Indian Laurel Fig species) in the public right-of-way (two fronting South Fairfax Avenue and one fronting West 3rd Street) (See Tree Report, Appendix A of this Initial Study).

Oil-Well Investigation and Abandonment

The Proposed Project's Geotechnical Investigation conducted a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Well Finder Website and concluded the Project Site is located within the Salt Lake Oil Field. In addition, the Chevron USA Well Numbers 99 and 102, plugged oil and gas production wells are located within the northern portion of the Project Site. The Proposed Project's Geotechnical Investigation stated, due to the voluntary nature of record reporting by oil well drilling companies, wells may be improperly located or not shown on the location map and other undocumented wells could be encountered during construction. The Chevron USA wells, and any wells encountered during construction, would need to be properly abandoned in accordance with the current requirements of the DOGGR. Any oil well

⁶ City of Los Angeles, Department of City Planning, Wilshire Community Plan, pg. II-3, 2001.

abandonment conducted on the Project Site would be conducted in consultation with the DOGGR, the Los Angeles County Regional Water Quality Control Board, the City of Los Angeles Department of Building and Safety, and the City of Los Angeles Fire Department. It is anticipated that the oil well abandonment effort may involve grading and earthwork activities and related activities. If required, a soil management plan will be prepared and require approval by the appropriate regulatory oversight agency independent of the Proposed Project. Any discretionary approvals associated with the oil well re-abandonment and related activities will be subject to CEQA independently from the Proposed Project.

3.2.4 Surrounding Land Uses

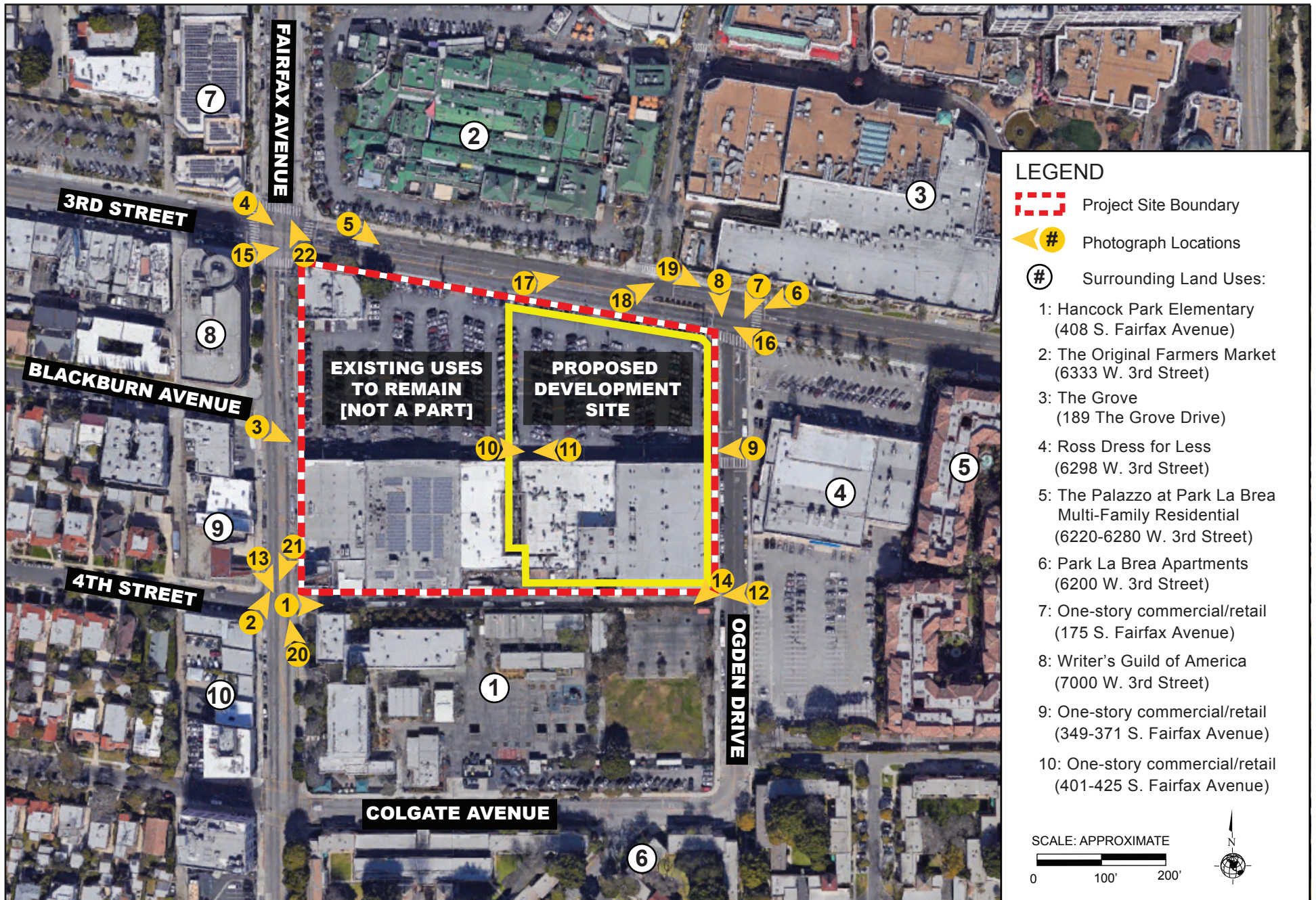
The properties surrounding the Project Site include commercial/retail uses, multi-family residential uses, a school, offices, and surface parking lots. Photographs of the land uses immediately surrounding the Project Site are provided in Figure A-6 and Figure A-7, Photographs of the Surrounding Land Uses.

North: Properties to the north of West 3rd Street are zoned C2-2D-O with a General Plan Land Use designation of Community Commercial, similar to the Project Site; and developed with the Original Farmers Market, comprised of one- to two-story commercial buildings and a surface parking lot, and the Grove, comprised of one- to three-story commercial buildings. See Figure A-6, Views 15 through 18.

West: Properties to the west of South Fairfax Avenue are zoned C2-1VL-O and C2-1LD-O with a General Plan Land Use designation of Neighborhood Office Commercial; and developed with the Writer's Guild office building. Properties further to the west are zoned R2-1-O, [Q]R3-1-O, and R3-1-O with a General Plan Land Use designation of Medium Residential; and developed with residential uses. See Figure A-7, Views 20 through 22.

East: South Ogden Drive borders the Project Site to the immediate east. Properties to the east of South Ogden Drive are zoned [Q]C2-2D with a General Plan Land Use designation of Community Commercial, similar to the Project Site; and developed with a one-story commercial building with surface parking lots and four five-story multi-family residential buildings. Properties further to the east are zoned RD1.5-1-O with a General Plan Land Use designation of Medium Residential; and developed with residential uses. See Figure A-7, View 19.

South: The property immediately abutting the Project Site to the south is the Hancock Park Elementary School, comprised of one- to two-story buildings. The elementary school is zoned PF-1XL-O with a General Plan Land Use designation of Public Facilities. Properties further south, across Colgate Avenue zoned RD1.5-1-O with a General Plan Land Use designation of Low Medium II Residential; and developed with two-story, townhome style multi-family residential buildings. See Figure A-6, Views 13 and 14.



Source: Google Earth, Aerial View, 2018.



View 1: On the east side of Fairfax Avenue looking east at the Project Site and adjacent alleyway.



View 2: On the west side of Fairfax Avenue looking northeast at the Project Site.



View 3: On the east side of Fairfax Avenue looking east at the Project Site.



View 4: On the northwest corner of 3rd Street and Fairfax Avenue looking southeast at the Project Site.



View 5: On the north side of 3rd Street looking southeast at the Project Site.



View 6: On the north side of 3rd Street looking southwest at the Project Site.

Source: Parker Environmental Consultants, June 5, 2018.



View 7: On the north side of 3rd Street looking south at the Project Site.



View 8: On the north side of 3rd Street looking south at the Project Site and Ogden Drive.



View 9: On the east side of Ogden Drive looking west at the Project Site.



View 10: On the Project Site looking east at the on-site eastern commercial properties proposed for demolition.



View 11: On the Project Site looking west at the on-site western commercial properties to be retained and renovated.



View 12: On the east side of Ogden Drive looking west at the Project Site and adjacent alleyway.

Source: Parker Environmental Consultants, June 5, 2018.



View 13: On the west side of Fairfax Avenue looking south at the property south of the Project Site.



View 14: On the north side of the adjacent alleyway looking southwest at the property south of the Project Site.



View 15: On the southwest corner of 3rd Street and Fairfax Avenue looking northeast at the properties north of the Project Site.



View 16: On the south side of 3rd Street looking northwest at the properties north of the Project Site.



View 17: On the south side of 3rd Street looking east at the properties north of the Project Site.



View 18: On the south side of 3rd Street looking northeast at the properties northeast of the Project Site.

Source: Parker Environmental Consultants, June 5, 2018.



View 19: On the north side of 3rd Street looking east at the properties east of the Project Site.



View 20: On the east side of Fairfax Avenue looking northwest at the properties west of the Project Site.



View 21: On the east side of Fairfax Avenue looking south at the properties southwest of the Project Site.



View 22: On the southeast corner of 3rd Street and Fairfax Avenue looking north at the properties northwest of the Project Site.

Source: Parker Environmental Consultants, June 5, 2018.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project Site is comprised of one legal lot, including seven APNs totaling 327,121 square feet in area. The Project Site is currently developed with 214,736 square feet of commercial retail uses. The easterly portion of the Project Site is currently developed with 63,688; while the westerly portion of the Project Site is currently developed with 151,048 square feet. The 63,688 square feet of existing commercial uses to remain on the western portion of the Project Site are not a part of the Proposed Project.⁷

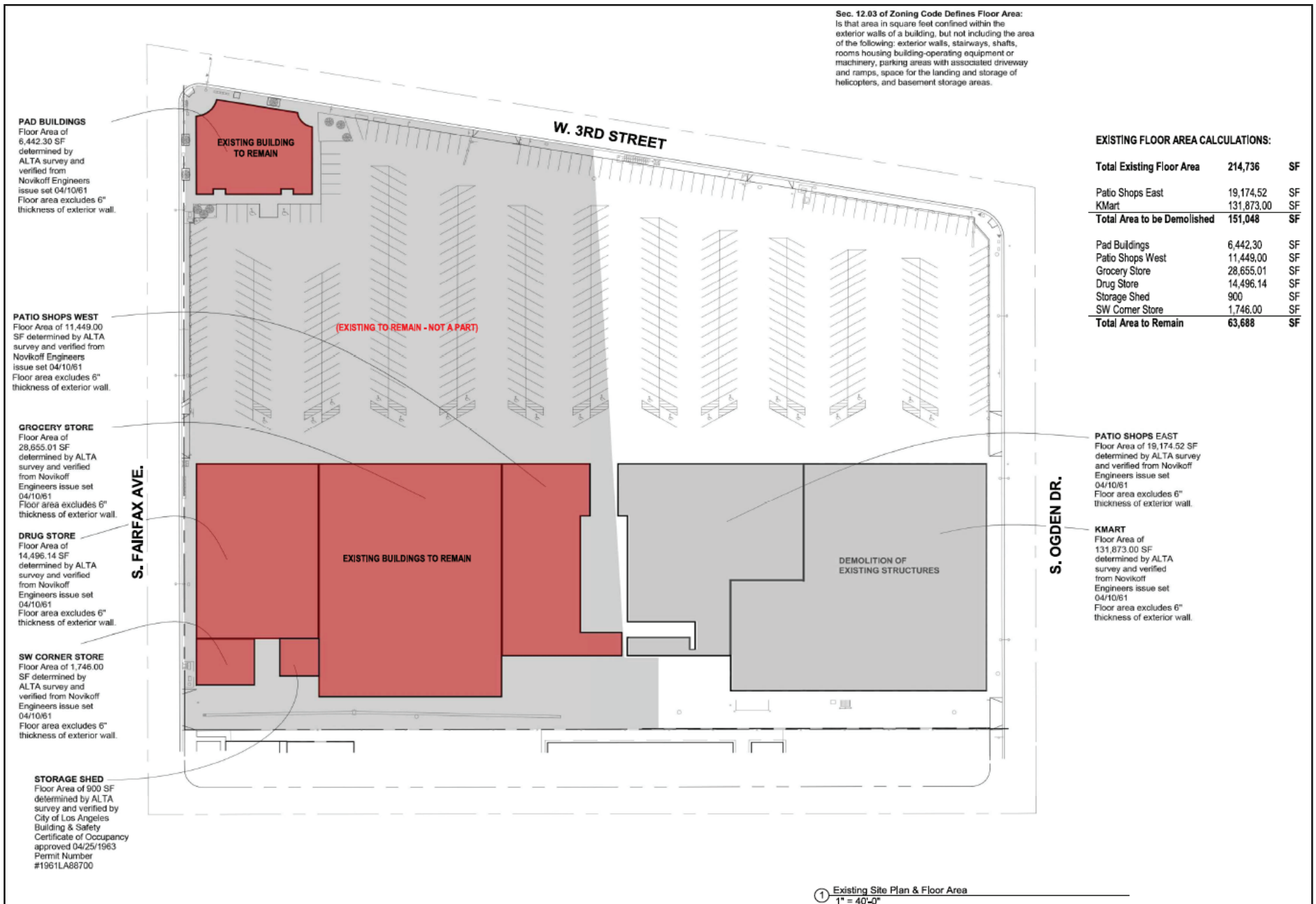
The Proposed Project includes the demolition of the two existing buildings, comprised of approximately 151,048 square feet of commercial space, and the partial demolition of an existing surface parking lot, all located on the easterly side of the Project Site. In its place, the Proposed Project would construct an eight-story, mixed-use building containing approximately 83,994 square feet of new commercial space and 331 residential dwelling units. Parking would be provided within three levels of above-grade parking and two levels of subterranean parking. Approximately 63,688 square feet of the commercial space will remain on the western portion of the Project Site.⁸ In total, the Proposed Project would include a total of approximately 490,682 square feet of floor area, including approximately 63,688 square feet of existing commercial floor area to remain, for a Floor Area Ratio (FAR) of 1.5 to 1. A summary of the Proposed Project with the proposed unit count and floor area is provided in Table 2, Proposed Development Program, below. The existing site plan and demolition plan is provided as Figure A-8. The level one floor plan layout of the Proposed Project is depicted in Figure A-9, Level One Floor Plan.

Table 2
Proposed Development Program

<i>Land Uses</i>	<i>Dwelling Units</i>	<i>Floor Area (Square Feet)</i>
Commercial		
<i>Commercial Buildings (to be demolished)</i>	--	(151,048)
<i>Commercial Buildings To Remain</i>	--	63,688
<i>New Commercial/Retail Space</i>	--	83,994
<i>Subtotal Commercial:</i>	--	147,682 sf
Residential		
<i>Studio Units</i>	70	343,000 sf ^a
<i>1-Bedroom Units</i>	162	
<i>2-Bedroom Units</i>	66	
<i>3-Bedroom Units</i>	33	
<i>Subtotal Residential:</i>	331	
TOTAL:	331 du	490,682 sf
<i>Notes: du = dwelling units; sf = square feet</i> ^[a] Includes residential units and support areas such as lobby, leasing office, and amenities. <i>Source: MVE + Partners, January 23, 2019.</i>		

⁷ See "Interim Site Improvements" subheading, below.

⁸ The existing 63,688 square feet of commercial floor area will remain on-site and is included in the calculation of total lot area for purposes of determining the overall floor area ratio. However, ongoing and planned tenant improvements on the western portion of the site involve ministerial building permits, which are not subject to CEQA and are not considered a part of the Proposed Project (See "Interim Site Improvements" subheading, below).



Source: MVE + Partners, January 23, 2019.

Figure A-9
Level 1 Floor Plan

Residential Uses

As shown in Table 2, above, the Proposed Project would include a maximum of 331 dwelling units comprised of 70 studio units, 162 one-bedroom units, 66 two-bedroom units, and 33 three-bedroom units of varying sizes and configurations. The residential units would be located on Level 4 through Level 8, above the proposed commercial/retail spaces and parking podium. The Proposed Project would also include residential amenities including, but not limited to, a lobby, mail and parcel area, leasing office, outdoor courtyards, pool deck, and amenity rooms.

Commercial Uses

The Proposed Project would include a combined total of approximately 147,682 square feet of commercial and retail space. As previously mentioned, the 63,688 square feet of existing commercial uses to remain on the western portion of the Project Site are not a part of the Proposed Project.⁹ The new 83,994 square feet of commercial space would occupy two stories within the mixed-use development located on the northeast portion of the Project Site, fronting West 3rd Street. The locations of the commercial/retail spaces are illustrated in Figure A-8.

3.3.2 Building Design

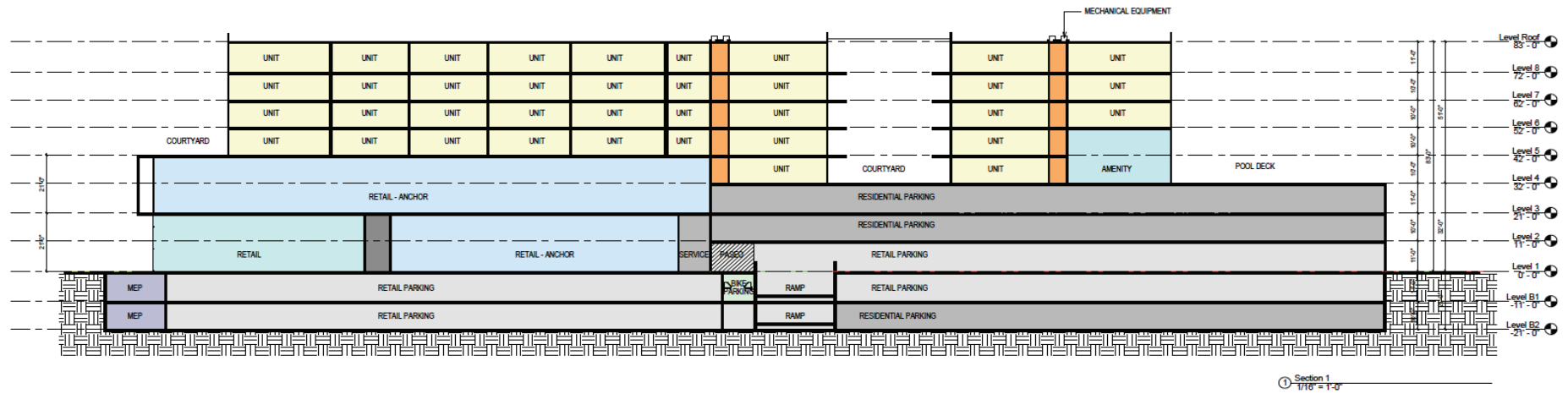
The Proposed Project would consist of an eight-story, mixed-use residential and commercial building with two subterranean parking levels. The proposed building proposes a maximum zoning height of 100 feet to the top of the 8th floor roof, including roof appurtenances. Architecturally, the Proposed Project integrates itself within its context through massing strategies and material selection. The Proposed Project merges courtyards on critical facades, including the southern and northern facades facing the elementary school and West 3rd Street, respectively. This promotes a residential and community atmosphere consistent with the immediate neighborhood, and allowing residential units direct access to open space and natural light. In addition, the facades jog in an out perpendicular to the street. This creates additional visual breaks that are enhanced with earthy materials, colors, and features. Building elevations and building sections depicting the scale and massing of the proposed development are shown in Figure A-10. Renderings depicting the massing of the proposed development are depicted in Figure A-11, 3-D Massing Views.

3.3.3 Open Space and Recreational Amenities

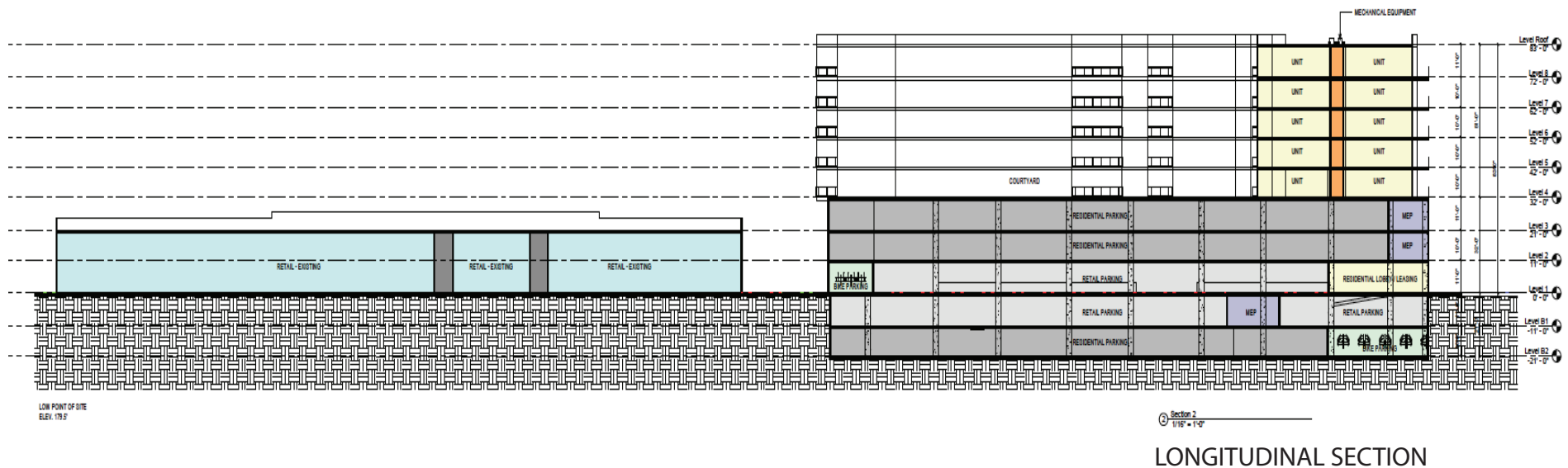
The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 3, below. Pursuant to the LAMC 12.21 G, the Proposed Project would be required to provide 37,225 square feet of open space on-site. Consistent with this requirement, the Project Site would provide 37,225 square feet of open space. Common open space would include outdoor courtyards, roof deck, pool deck, and amenity rooms. Private open space would be provided via residential balconies.

Additionally, a minimum of 25 percent of open space would be landscaped with a variety of drought-tolerant plant species. The Proposed Project would also be required to provide one tree for every four units for a total of 83 required trees on-site. The Proposed Project proposes to plant a minimum of 83 trees on-site in accordance with the LAMC.

⁹ See "Interim Site Improvements" subheading, below.

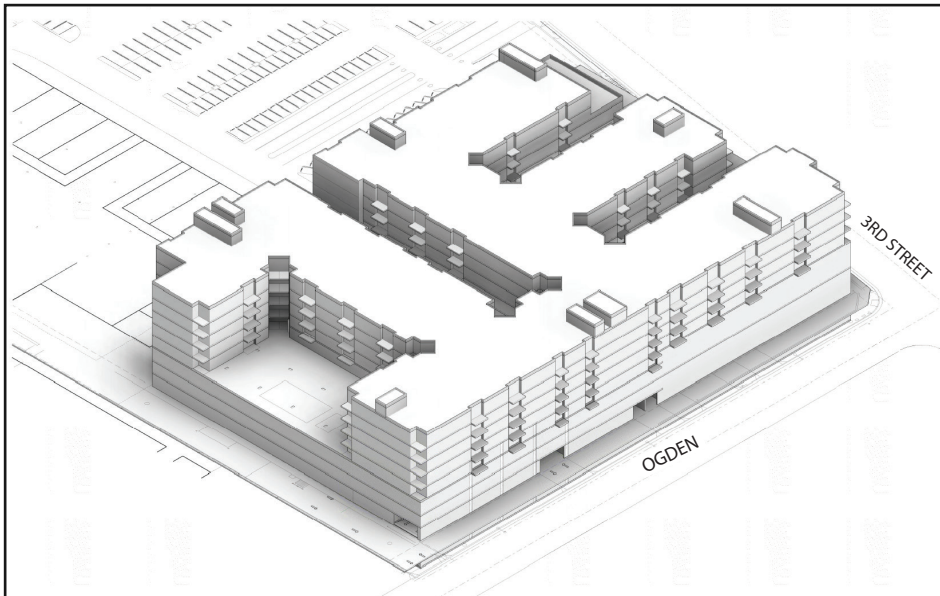


TRANSVERSE SECTION

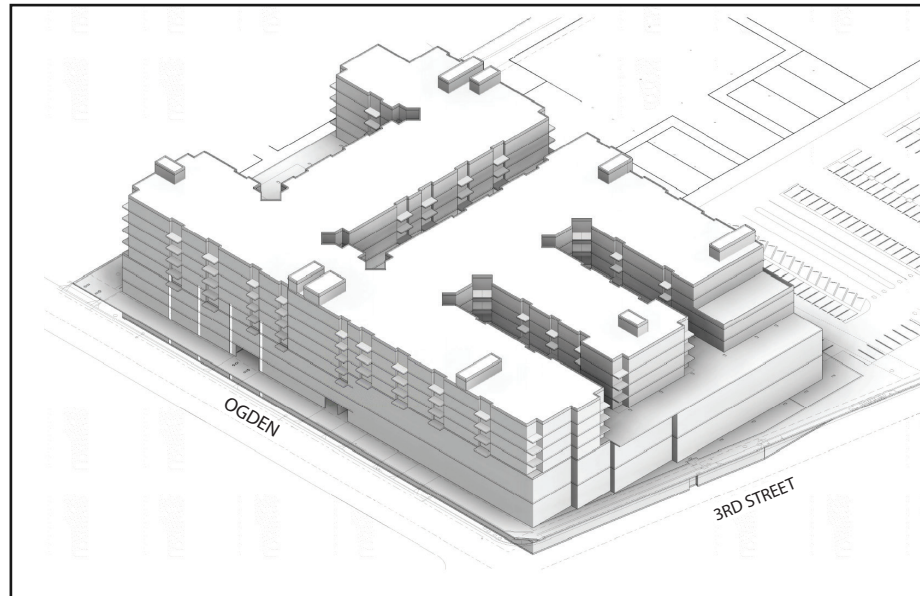


LONGITUDINAL SECTION

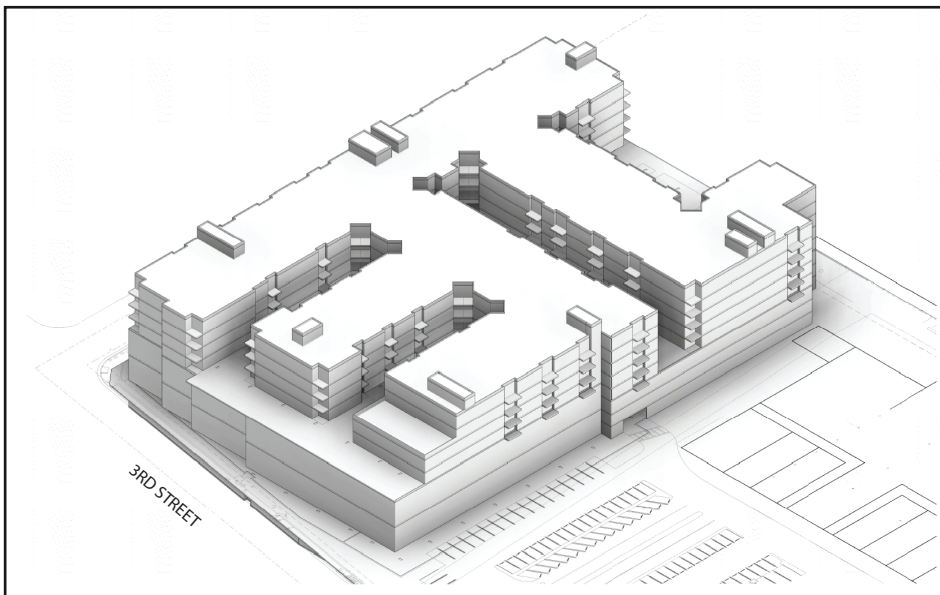
Source: MVE + Partners, January 16, 2019.



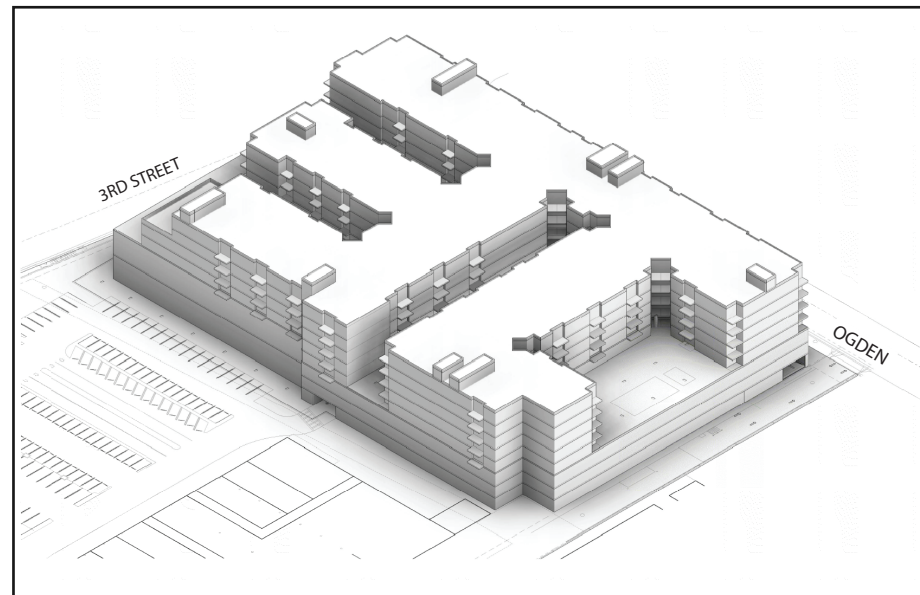
VIEW FROM THE SOUTHEAST



VIEW FROM THE NORTHEAST



VIEW FROM THE NORTHWEST



VIEW FROM THE SOUTHWEST

Source: MVE + Partners, June 14, 2018.

Table 3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements ^a	Dwelling Units	Open Space (square feet)
Less than 3 Habitable Rooms (100 sf/du) ^b	232	23,200 sf
3 Habitable Rooms (125 sf/du) ^c	66	8,250 sf
More than 3 Habitable Rooms (175 sf/du) ^d	33	5,775 sf
Total	331 du	37,225 sf
Proposed Open Space	Open Space (square feet)	
Rooftop, Pool Deck, and Courtyards	31,585	
Amenity Rooms	5,640	
Total	37,225 sf	
Notes: du = dwelling unit; sf = square feet		
^a LAMC 12.21.G		
^b Includes studio and one-bedroom units.		
^c Includes two-bedroom units.		
^d Includes three-bedroom units.		
Source: MVE + Partners, January 23, 2019.		

There are three street trees in the public right-of-way (two fronting South Fairfax Avenue and one fronting West 3rd Street). The Indian Laurel Fig on West 3rd Street may be removed and replaced on a 2:1 ratio subject to the review and approval of the Department of Public Works, Urban Forestry Division.

3.3.4 Access, Circulation, and Public Transportation

Access

Parking for the Proposed Project's mixed-use building would be provided in a parking garage containing three levels of above-grade and two levels of subterranean parking, containing 982 spaces. The surface parking on the western portion of the Project Site would remain and be restriped with 174 spaces to accommodate the existing 63,688 square feet of existing commercial retail uses to remain. Access to the parking garage would be provided via two driveways on the westerly side of South Ogden Drive. Access to the surface parking areas would be provided via one driveway each along South Fairfax Avenue and West 3rd Street. The surface parking would also provide an entrance into the parking garage of the mixed-use building. The private southerly driveway would provide a one-way service driveway for loading purposes.

Pedestrian access would be provided to the Project Site from South Fairfax, West 3rd Street, and South Ogden Drive. Pedestrian walkways would be provided throughout the Site connecting the residential lobby areas, retail spaces, amenity and open space areas, and parking areas.

Dedication Requirements

West 3rd Street is an Avenue II (Secondary Highway), which requires a right-of-way width of 86 feet. The existing condition is 73 feet wide. A 13-foot dedication for sidewalk and parkway improvements and not curb widening will be required. The Applicant is seeking a waiver of dedication and improvements due to the existing bank building located 10 feet from the existing right-of-way. Said area along West 3rd Street may be determined to be a future dedication.

South Fairfax Avenue is also an Avenue II (Secondary Highway), which requires a right-of-way width of 86 feet. The existing condition is 70 feet wide. The existing half width for the easterly portion of the street is 30 feet and, therefore, will require a 13-foot dedication for sidewalk and

parkway improvements. The Applicant is seeking a waiver of dedication and improvements due to the existing CVS building and bank building being located 10 feet from the existing right of way. Said area along South Fairfax Avenue may be determined to be a future dedication.

South Ogden Drive is a Local Street – Standard, which requires a right-of-way width of 60 feet. The existing sidewalk width is 10 feet and the required sidewalk for a Local Street is 12 feet, so a two-foot dedication for sidewalk and parkway improvements will be required. The Applicant is seeking a waiver of dedication and improvements to grant a two-foot easement in lieu of dedication.

Transit

As previously mentioned, the Project Site is well served by public transit. Several bus lines managed by Metro and LADOT DASH, which provide transfer opportunities to Foothill Transit Lines, Montebello Bus Lines, and Orange County Transportation Authority (“OCTA”) Lines are located within the immediate vicinity of the Project Site. Metro Bus Lines that service the Project area include the Metro Rapid Bus Line 780, located on South Fairfax Avenue; and Metro Local Bus Lines 16 and 316, located on West 3rd Street. Other Metro Local Bus Lines not defined as a major bus route include: Metro Line 217, 281, and 17. Additionally, the Project Site is also served by LADOT DASH Fairfax bus route, which includes a stop adjacent to the Project Site and provides service throughout the Mid-City West community.

3.3.5 Parking

The parking ratio for the Proposed Project’s residential uses is based on the LAMC Section 12.21 A.4, which requires one parking space per dwelling unit with less than three habitable rooms; one and one-half (1.5) parking spaces for each dwelling unit with three habitable rooms; and two spaces for each dwelling unit with more than three habitable rooms. Based on the proposed unit mix, the Proposed Project is required to provide 511 residential vehicle parking spaces.

The parking ratio for the Proposed Project’s commercial uses is based on the LAMC Section 12.21 A.4(c), which requires four spaces for every 1,000 square feet of general retail commercial uses and 1 per 100 square feet of restaurant use. As previously described, the Project includes the construction of 83,994 square feet of new commercial floor area including 64,994 square feet of general retail area and up to 19,000 square feet of restaurant space. Based on the proposed square footage of new commercial floor area, 450 new commercial/retail spaces would be required.

The parking ratio for the Proposed Project’s existing commercial uses to remain is based on LAMC Section 12.23 B.8, which permits a grandfathered parking rate of 1 parking space per 500 square feet. As previously described, 63,688 square feet of existing commercial floor area would remain on-site. Based on the existing square footage of commercial floor area, 127 parking spaces would be required.

Based on the above, the Proposed Project is required to provide a total of 1,088 parking spaces, which includes 511 residential parking spaces and 450 commercial parking spaces for the new uses; and 127 spaces for existing uses to remain. The Proposed Project would provide a total of 1,156 parking spaces, including 174 surface parking spaces, re-striped within the existing westerly surface parking lot to remain, and 982 spaces within the proposed parking garage. As summarized in Table 4, the Proposed Project would be consistent with the applicable parking requirements of the LAMC.

Table 4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity (units or sf)	Parking Required by Code ^{a, b}		Parking Provided ^c
		Rate	Spaces	
Commercial				
Existing Commercial to Remain	63,688 sf	1 space per 500 sf	127	127
New Commercial/Retail	64,994 sf	4 spaces per 1,000 sf	260	260
New Commercial Restaurant	19,000 sf	1 space per 100 sf	190	190
Commercial Total:			577	577
Residential (331 total dwelling units)				
Studio	70 du	1.0 space per bedroom	70	70
One-Bedroom	162 du	1.5 spaces per bedroom	243	243
Two-Bedroom	66 du	2.0 spaces per bedroom	132	132
Three-Bedroom	33 du	2.0 spaces per bedroom	66	66
Residential Subtotal:			511	511
Surplus Spaces				68
TOTAL:			1,088	1,156
Notes:				
^a For Residential Use: Parking calculations based on LAMC Section 12.21 A.4.				
^b For Commercial Use: Parking calculations based on LAMC Section 12.21 A.4(c).				
^c The Proposed Site Plan includes a total of 1,156 parking spaces which includes a total of 982 parking spaces for the Proposed Project plus 174 restriped surface parking spaces for the 63,688 square feet of existing commercial/retail spaces that is to remain.				
Source: MVE + Partners, January 23, 2019.				

Table 5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Bicycle Parking Required ^[a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Commercial		1 space / 2,000 sf	1 space / 2,000 sf		
Commercial/Retail	83,994 sf	42	42	84	84
Residential		space / du ^[b]	1 space / 1 du ^[c]		
Dwelling Units 1-25	25	2	25	27	27
Dwelling Units 26-100	75	5	50	55	55
Dwelling Units 101-200	100	5	50	55	55
Dwelling Units >200	131	3	33	36	36
Subtotal Residential	331	15	158	173	173
TOTAL		57	200	257	257
Notes: du = dwelling unit, sf = square feet					
^[a] LAMC 12.21 A.16, Table 12.21.					
^[b] Short-term bicycle parking requirements are 1 space per 10 units for units 1-25, 1 space per every 15 units for units 26-100, 1 space per every 20 units for units 101-200, and 1 space per every 40 units for all units above 201,					
^[c] Long-term bicycle parking requirements are 1 space per units for units 1-25, 1 space per every 1.5 units for units 26-100, 1 space per every 2 units for units 101-200, and 1 space per every 4 units for all units above 201,					
Source: MVE + Partners, January 23, 2019.					

The bicycle parking required for the Proposed Project's residential uses is based on the LAMC Section 12.21 A.16, which requires short- and long-term bicycle parking spaces consistent with the ratios outlined in Table 5, below. Based on the unit mix, the Proposed Project is required to provide 173 bicycle parking spaces including 158 long-term and 15 short-term residential bicycle spaces. Based on the square footage of new commercial floor area, the Proposed Project would be required to provide a total of 84 bicycle commercial bicycle parking spaces, including 42 short-term and 42 long-term spaces. Thus, the combined residential and commercial bike parking spaces result in a total of 257 bicycle parking spaces on-site, including 200 long-term spaces and 57 short-term spaces. As summarized in Table 5, the Proposed Project would be consistent with the applicable bicycle parking requirements of the LAMC.

3.3.6 Signage and Lighting

The Proposed Project would be consistent with the signage and lighting requirements pursuant to the LAMC. The Proposed Project would include low-level security lighting throughout the campus to illuminate walkways and vehicle access points. Lighting fixtures would also be provided within the parking structure.

3.3.7 FAR, Density, and Setbacks

The Project Site is zoned C2-1-O. The zoning indicates that the Proposed Project is located in Height District No. 1, which permits a maximum of 1.5:1 FAR and unlimited height. The Proposed Project includes approximately 426,994 square feet of new construction and 63,688 square feet of existing commercial floor area to remain (approximately 1.5:1 FAR). The proposed eight-story building would have a maximum height of approximately 100 feet above grade at the roof level, including roof top appurtenances.

Pursuant to LAMC Section 12.14 C, the C2 Zone permits residential development at a density of one dwelling unit per 400 square feet of lot area. The Project Site encompasses approximately 327,121 square feet of lot area, thereby permitting a maximum of 818 dwelling units on-site. The Proposed Project includes the development of 331 dwelling units, which is within the maximum permissible density regulated by the Zone.

The C2 Zone requires setbacks in accordance with the R4 zone for residential uses and requires no setbacks for commercial uses. Due to the orientation of the Project Site, South Fairfax Avenue and South Ogden Drive are considered front yards, and West 3rd Street and the southern property line are considered side yards. Rear yard setbacks are not applicable to the Project Site. No front yard setbacks are required for commercially used portions of the Project Site. For the residential component of the Proposed Project, a side yard of five feet plus one foot for each story above the second level is required, up to a maximum of 16 feet. As such, the Proposed Project would require a 16-foot side yard setback from both the southern property line and West 3rd Street. The Proposed Project would provide zero front yard setbacks along South Fairfax Avenue and South Ogden Drive; and 16-foot side yard setbacks along West 3rd Street and the southern property line.

3.3.8 Sustainability Features

The Proposed Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Proposed Project would be designed to meet the requirements for the U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver or equivalent.

The Proposed Project would utilize state-of-the-art green building technology initiatives and eco-friendly sustainability practices that exceed local, state, and national standards for green building practices. The building would include sustainable design to meet or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the development would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving and low-flow fixtures, non-VOC paints and adhesives, drought tolerant planting, and high-performance building envelopment. The building would also be designed to accommodate solar photovoltaic panels and on-site electric vehicle chargers. Additionally, other sustainability elements integrated within the Proposed Project may include:

- Use of natural ventilation and daylighting throughout the Proposed Project to reduce the load and size of electrical and mechanical systems;
- Use of drought resistant planting and grasses to reduce irrigation water use by more than 50%;
- Creation of a rooftop garden for storm water discharge delay, reduction of heat island effect and creation of additional habitat within the Proposed Project;
- Transportation Demand Management program;
- Re-use of existing commercial land;
- On-site amenities to reduce off-site transportation demand during the day, such as office and restaurant space;
- Energy-efficient site lighting and design to meet the Illuminating Engineering Society of North America (IESNA) lighting density and control standards for minimizing light pollution;
- Utilization of on-site photo-voltaic solar arrays to generate on-site energy;
- Floor plate layout and modeling of glazing systems that are conducive to daylighting strategies;
- Building systems designed to avoid the use of heating, refrigeration, and fire suppression systems that include chlorofluorocarbons or halon compounds;
- Energy efficient building envelope design, including high performance glazing, cool roof and green roof, and optimized insulation levels;
- Energy efficient lighting and HVAC equipment;
- Extensive building commissioning practices to fine-tune energy using system performance;
- Building energy management controls system to optimize energy performance
- Provision for electric vehicle charging; and
- Indoor environmental quality measures, including selection of low-emitting interior finish materials, paints, and coatings; construction indoor air quality plan, during construction and prior to occupancy.

3.3.9 CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, Energy Conservation, the EIR will provide further information with respect to energy conservation features, energy implications, and the energy-consuming equipment and processes that would be used during Proposed Project construction and operation. Design features of the Proposed Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Proposed Project will also be analyzed in the EIR. In addition, while development of the Proposed Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Proposed Project's consistency with Appendix F will also be provided in the EIR.

3.3.10 Project Construction and Scheduling

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 32 months, with final buildout occurring in 2023. Construction activities associated with the Proposed Project would be undertaken in five main steps: (1) demolition and site clearing, (2) grading and excavation, (3) building construction, (4) architectural coating and finishing, and (5) paving. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 a.m. to 9:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

This phase would include the demolition of the two eastern existing structures and removal of the asphalt surface parking lot on the eastern portion of the Project Site. Approximately 151,048 square feet of existing developed building area would be demolished and exported from the Project Site during this phase. The demolition/site clearing phase would be completed in approximately two months.

Excavation and Grading Phase

After the completion of demolition and site clearing, the next phase would include the excavation and grading of the subterranean parking levels. This phase would occur for approximately three months and would involve soil excavation and installation of tie-backs and retaining walls. Site grading would require approximately 86,500 cubic yards (cy) of soil export to be hauled off-site to a suitable receiving location. Haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the Deputy Advisory Agency.

Building Construction Phase

The building construction phase consists of construction of the subterranean parking levels, building foundations, basement walls and residential/commercial structures. This phase is expected to occur for approximately 15 to 16 months.

Architectural Coating and Paving Phase

Upon completion of the structures, architectural coating, finishing, and paving would occur. The architectural finishing phase would involve installation of windows, doors, cabinetry, appliances, and would also involve the application of interior and exterior paint and finish-coating materials. Paving involves the laying of concrete and asphalt for the parking lots, driveways, sidewalks, and alleyway. It is estimated that architectural coatings and paving would occur over the last three months and two weeks, respectively, of the construction phase.

Temporary Right-of-Way Encroachment

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

During construction, a temporary fence would be erected around the perimeter of the Project Site to secure the site and prevent trespassing. Construction of the Proposed Project may require temporary encroachment into the sidewalk areas on South Fairfax Avenue, West 3rd Street, and South Ogden Drive, necessitating a pedestrian detour route around the Project Site.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. For construction recycling and waste reduction efforts, Waste Management Downtown Diversion facility accepts construction and demolition waste for recycling and is located approximately 11 miles east from the Project Site (approximately 22 miles round trip). The haul route for these trips would include traveling Southbound on South Fairfax Avenue to San Vicente, eastbound on San Vicente to South La Brea Avenue, southbound on South La Brea Avenue to the I-10 Freeway. The returning trips would utilize the same route but in the opposite direction.

It is estimated that the construction of the Proposed Project would require the excavation and export of approximately 86,500 cy of soil. Assuming an average of 14 cy per truck, the excavation process would generate approximately 12,358 haul truck trips (6,179 inbound and 6,179 outbound) over an approximate three-month period (i.e., approximately 188 haul trips per day (94 inbound and 94 outbound). Haul truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. Export material will be transported to a designated fill site or to the Sunshine Canyon Landfill or Chiquita Canyon landfills, which accept inert soil material. The haul route to and from these facilities would involve traveling east on West 3rd Street to Highland Avenue, north on Highland Avenue to access the 101 Freeway. Returning trips would likely utilize the same route but in southbound direction. The haul route specified above may be modified in compliance with City policies, subject to the review and approval of the Department of Transportation and/or the Board of Public Works, as applicable to the Project.

3.4 REQUESTED PERMITS AND APPROVALS

Lead Agency

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the “Lead Agency” (State CEQA Guidelines Section 15367). For purposes of the Proposed Project, the City is the primary governmental agency responsible for approving the Proposed Project. As such, the EIR must be certified and the Proposed Project must be approved by the City of Los Angeles Department of City Planning before the Proposed Project can commence. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

Entitlement Requests

The City of Los Angeles has the principal responsibility for approving the Proposed Project. Approvals required for development of the Proposed Project may include, but not limited to, the following:

- Pursuant to LAMC Section 16.05, the Applicant requests Site Plan Review for a Project that will result in an increase of more than 50 dwelling units.
- Pursuant to LAMC Section 17.50, the Applicant requests a Preliminary Parcel Map for the division of land in order to create two airspace lots, approval of a Waiver of Dedication and Improvements to waive all dedication requirements along South Fairfax Avenue, West 3rd Street and South Ogden Drive, and approval of a haul route for the

export of approximately 86,500 cubic yards of soil.

Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project, including certificates, permits to remove on-site and off-site trees, demolition permits, haul route approval, grading and associated building permits.

3.5 INTERIM SITE IMPROVEMENTS

As mentioned in the discussion above, the Project Site is currently improved with multiple retail/commercial buildings consisting of approximately 214,736 square feet of floor area. Approximately 63,688 square feet of existing commercial floor area located on the western portion of the Project Site is not a part of the Proposed Project and anticipated to remain operational during construction. As a live operating commercial/retail site, several ongoing and planned tenant improvements that may require ministerial building permit approvals are anticipated to occur on this portion of the site prior to, during and after construction on the eastern side of the Project Site. However, these improvements are not a part of the proposed development, which is dependent upon the entitlements described above. Provided for informational purposes only, ongoing site improvements that are not a part of the Proposed Project may include but are not limited to the following:

- Interior renovations and demising of tenant spaces;
- Plumbing and electrical improvements;
- Landscaping improvements;
- Re-contouring and re-striping of the existing surface parking lot;
- Exterior façade improvements.

The above improvements are specifically identified as “not a part” of the Proposed Project because they are independent improvements that involve only ministerial actions and do not commit the Applicant to develop or proceed with the Proposed Project. These improvements are considered essential to ensure the ongoing operation of existing businesses and property maintenance do not require discretionary actions by the City. As such they are not subject to CEQA. However, to the extent these planned improvements and construction activities overlap or run concurrently with the proposed construction and/or operational activities of the Proposed Project, such activities would be evaluated and analyzed in the environmental impact analysis in the EIR. For example, for purposes of calculating the total floor area ratio of the site, the existing floor area to remain is included as part of this calculation. Additionally, the number of parking spaces that are required to meet the LAMC requirements are calculated based on the proposed uses and the existing retail floor area that will remain on the western portion of the Site.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below provide an initial analysis of potential environmental impacts and indicate those issues that are expected to be further analyzed in an Environmental Impact Report (EIR) and demonstrate why other issues, which will not result in potentially significant environmental impacts do not need to be analyzed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would in fact result from the Proposed Project. Rather, such responses indicate those issues will be further analyzed in an EIR to determine the impact level of significance in compliance with CEQA.

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹⁰

Based on the mixed-use residential character of the Project and its location on an infill site within a TPA as defined by CEQA on the Citywide TPA map attached to ZI No. 2452, PRC Section

¹⁰ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed June 2018.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. The Project Site is located in a commercially developed area of the City of Los Angeles and not within the vicinity of any hillsides or undeveloped areas with natural scenic resources or scenic vistas. The Project Site is currently improved with an approximately 214,736 square-foot retail center known as Town and Country Shopping Center, comprised of five commercial buildings and a surface parking lot. The Proposed Project includes the partial demolition of the existing commercial buildings and surface parking lot, and the construction of a new eight-story, mixed-use building with a maximum height of approximately 100 feet above grade. The surrounding land uses are comprised of institutional, residential, commercial, and office uses. The scale and character of the area immediately surrounding the Project Site ranges from low-rise commercial, institutional, and residential buildings to mid-rise office and multi-family buildings, which range from one to five stories in height along West 3rd Street. The height and massing of the Proposed Project would therefore not be out of character

with other mid-rise buildings within the immediate area. Furthermore, there are no scenic vistas on, or viewable from, the Project Site. As such, the Proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant and no further analysis of this issue is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. The Project Site is located in a commercially developed area of the City of Los Angeles and is improved with an approximately 214,736 square-foot retail center known as Town and Country Shopping Center. The Center is comprised of five commercial buildings and a surface parking lot. Vegetation on the Project Site is limited to 13 trees (five Canary Pine, one Aleppo Pine, and seven Mexican Fan Palm species) on the Project Site and three street trees (Indian Laurel Fig species) in the public right-of-way adjacent to the Project Site. As noted in the Protected Tree Report (see Appendix A to this Initial Study), none of the existing trees are identified as protected tree species pursuant to the City of Los Angeles Native Tree Protection Ordinance. There are no rock outcroppings or unique landforms on the Project Site. Additionally, as discussed in further detail under Checklist Question III, Cultural Resources, there are no historic resources on the Project Site. Thus, the Proposed Project would not substantially damage scenic resources such as rock outcroppings, protected trees, historic buildings, or other unique scenic resources.

There are no scenic highways within the immediate vicinity or viewshed of the Project Site. There are no state-designated scenic highways in the vicinity. Therefore, the Proposed Project would not have the potential to substantially damage scenic resources within a state scenic highway. Impacts would be less than significant impact and no further analysis of this issue is required in the EIR.

b. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in an urbanized area. The scale and character of the area immediately surrounding the Project Site ranges from low-rise commercial, institutional, and residential buildings to mid-rise office and multi-family buildings. To the immediate north is The Original Farmers Market, which includes one- to two-story commercial buildings and a surface parking lot; and The Grove, which includes a mix of one to three-story commercial buildings and a seven-level parking structure. To the west, across Fairfax Avenue, is a one-story commercial/retail building and a four-story office building. To the east, across South Ogden Drive, is a one-story commercial building with surface parking lots and five-story, multi-family residential buildings. Immediately to the south, across the alleyway, is the Hancock Park Elementary School, comprised of one- to two-story buildings. It should be noted that the Original Farmer's Market, located at 6333 West 3rd Street¹¹, and the Hancock Park Elementary School, located at 408 South Fairfax Avenue, is listed in the California Register of Historical Resources, and eligible for the National Register, respectively, and are part of the existing aesthetic setting. The Proposed Project would create an approximately eight-story mixed-use development on a

¹¹ Farmers Market and Rancho La Brea Adobe, Los Angeles Historic Cultural Monument (HCM) No. 543 (at p.21).

Project Site that is planned and zoned for such uses, containing new buildings, reconfigured parking facilities, enhanced landscaping and improved open space area. The new mixed-use building would have direct commercial/retail frontage on 3rd Street, which would complement this commercial corridor and provide direct pedestrian and bicycle access to 3rd Street. Therefore, the Proposed Project would not substantially degrade the existing visual character or quality of the Project Site and its surroundings. Impacts would be less than significant impact and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact. The Proposed Project would include the partial demolition of existing commercial buildings and a surface parking lot, and the construction of a new eight-story, mixed-use development, and thus have the potential to introduce new sources of light and glare within the Project vicinity. The Project Site is currently improved with an approximately 214,736 square-foot retail center known as Town and Country Shopping Center. Existing sources of light and glare are generated by lights within retail storefronts and pole lights within the surface parking areas. Additionally, the site is partially illuminated by spillover lighting from street lights along South Fairfax Avenue, South Ogden Drive, and West 3rd Street. Site improvements would include low-level security lighting fixtures for pedestrian safety and security. Consistent with the existing environmental lighting conditions, nighttime lighting fixtures would be designed to illuminate the building entrances, common open space areas, and parking areas to provide adequate nighttime visibility for residents, guests, and visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. To ensure that lighting sources are not directly visible by adjacent properties, the Proposed Project's lighting fixtures would be installed and operated in accordance with 99.05.106.8 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). In addition, ambient light is created by nearby commercial uses, automobile headlights on roadways and parking lots, and the existing commercial uses and parking lots to remain adjacent to the Project Site. These uses contribute to a relatively high level of existing ambient light levels. As such, the Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses.

Potential reflective surfaces that occur in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. The Proposed Project's architectural materials and landscaping would prevent unnecessary glare. The landscaped courtyards and green areas would serve to reduce the building's heat gain and reflective glare potential. The Proposed Project is located in an urbanized and developed area, and would not introduce any new substantial sources of glare that are incompatible with the surrounding development. Therefore, impacts would be less than significant impact and no further analysis of this issue is required in the EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in

assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

Responses a though e: No Impact. The Project Site is located in an urbanized and highly developed area of the Wilshire community and zoned for commercial land uses. No farmland or agricultural activity exists on the Project Site, nor are there any farmland, agricultural, or forestland activities in the vicinity of the Project Site. According to the Los Angeles County Important Farmland 2016 map, prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.¹² Therefore, no impact to agricultural lands would occur and no further analysis of this issue is required in the EIR.

¹² State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map, accessed June 2018.

III. AIR QUALITY

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

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

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

Potentially Significant Impact. The potential impacts of a project are compared with the applicable Air Quality Management Plan (AQMP) to determine consistency. The Project Site is located within the South Coast Air Basin (Basin) and within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Pursuant to the federal and state Clean Air Acts, within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone [O₃], particulate matter less than 2.5 microns in size [PM_{2.5}], particulate matter less than 10 microns in size [PM₁₀], and lead¹³). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.¹⁴ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. The Proposed Project is consistent with the land use designations in the applicable community plan and thereby consistent with the 2016-2040 RTP/SCS.

¹³ Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

¹⁴ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

Nonetheless, the Proposed Project has the potential to generate short-term regional and localized emissions during the construction phase and long-term regional emissions associated with operational activities. Therefore, the Proposed Project's air quality impacts and consistency with the applicable AQMP will be further analyzed in the scope of the EIR.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. Development of the Proposed Project has the potential to generate air quality emissions, which can contribute to cumulative impacts when assessed in conjunction with related projects that are approved, under construction or resalable foreseeable to occur within the greater project area. The Proposed Project's air quality emissions analysis would evaluate six criteria pollutants: reactive organic gases (ROG), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with less than 10 microns diameter (PM₁₀), and particulate matter with less than 2.5 microns diameter (PM_{2.5}). The SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or state ambient air quality standard. The construction and operational emissions would be compared to the "Mass Daily Thresholds" listed in SCAQMD's regional Air Quality Significance Thresholds to determine whether the Proposed Project's emissions would result in a cumulative considerable net increase in air quality emissions. Therefore, the Proposed Project's potential to contribute to cumulative air quality impacts will be further assessed analyzed within the scope of the EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. In addition to the SCAQMD's regional significance thresholds, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants. The SCAQMD developed mass-based localized significance thresholds (LSTs) that are the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are identified in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD, apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. The daily on-site construction emissions generated by the Proposed Project are analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. Sensitive receptors in the Project vicinity include the Hancock Park Elementary School, located directly south of the Project Site, and the residents of the multi-family residential land uses in the immediate project vicinity. The Proposed Project's localized air quality emissions will be quantified and analyzed in relation to the SCAQMD's localized significance thresholds and the potential impacts air emissions could have on sensitive receptors. Therefore, the Proposed Project's potential impacts on sensitive receptors and pollutant concentrations, within a certain radius of the Project Site will be disclosed and further analyzed in the scope of the EIR.

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

Less Than Significant Impact. Construction of the Proposed Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions.¹⁵ In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Proposed Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations.¹⁶ Construction and operation of the Proposed Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁷

Based on the above, the Proposed Project would not result in other emissions that adversely affect a substantial number of people and the potential odor impact during construction and operation of the Proposed Project would be less than significant. No further analysis of this topic in the EIR is required.

IV. BIOLOGICAL RESOURCES

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

¹⁵ SCAQMD, Rule 1138, Control of Emissions from Restaurant Operations.

¹⁶ SCAQMD, Visible Emissions, Public Nuisance & Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed August 17, 2018.

¹⁷ SCAQMD, Rule 402, Nuisance.

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

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

Less Than Significant Impact. The Project Site is located in a highly developed area of the City of Los Angeles and currently improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. The California Department of Fish and Wildlife and US Fish and Wildlife Service databases do not identify any candidate, sensitive or special status species critical habitat on or around the Project Site. While only minimal landscaping and ornamental trees exist on the Project Site and within the parking lot area, the Project Site contains 13 ornamental, non-protected trees, which have the potential to support migratory bird species that occur within the region. The removal of vegetation and disturbances to the potential bird habitat could result in potential impacts to nesting native bird species, if any such species happen to be nesting on site at the time of tree removals.

However, migratory nongame native bird species are protected by the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Further, Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA through precautionary and preventative measures to avoid

or reduce the potential for disturbances to wildlife during construction. The Applicant will be required to comply with the MBTA as part of the Proposed Project to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees located on the Project Site. Therefore, the Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

b. 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. The Project Site is currently improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. Therefore, the Proposed Project would not 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 US Fish and Wildlife Service. As such, no impact would occur and no further analysis of this issue is required in the EIR.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. As the Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. The Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Section 4(b), above). No construction or operational activities have the potential to directly or indirectly impact wetland. Therefore, the Proposed Project would not a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impacts to riparian or wetland habitats would occur and no further analysis of this issue is required in the EIR.

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?

No Impact. The Project Site is located in a heavily urbanized area of in the City of Los Angeles and currently improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. Due to the highly urbanized surroundings, and extent of existing commercial development on the Project Site, there are no wildlife corridors or native wildlife nursery sites that would be impacted by the Proposed Project. Thus, the Proposed Project would not interfere substantially with the movement of any residents or migratory fish or wildlife. No impact would occur and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact. The Project Site is currently improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. Based on the Protected Tree Report, contained in Appendix A to this Initial Study, the Tree Resource identified a total of 13 trees on the Project Site and three trees in the public right-of-way¹⁸, none of which are protected tree species pursuant to the City's Native Tree Protection Ordinance (Ord. No 177,404). The three street trees are identified as Indian Laurel Fig trees; and the 13 on-site trees include five Canary Pine, one Aleppo Pine, and seven Mexican Fan Palm species. The removal and replacement of these trees would not be in conflict with the Protected Tree Ordinance or any other local policies protecting biological resources. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

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

No Impact. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Proposed Project, and no further analysis of this issue is required in the EIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))?	☐	☐	☒	☐

The following analysis is based on the findings and recommendations of the following technical reports that have been prepared for the Proposed Project:

- GPA Consulting, Historical Resources Technical Report, 6300 W. 3rd Street, Los Angeles, CA, February 2019.

¹⁸ Source: The Tree Resource, Protected Tree Report, May 7, 2018

- SWCA, Archaeological Resources Assessment for the 6300 W. Third Street Project, Los Angeles, Los Angeles County, CA, February 2019.

These reports are included in Appendix B and C, respectively, to this Initial Study.

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

Less Than Significant Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Section 15064.5 of the CEQA Guidelines 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 an 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.

To determine the potential for the Proposed Project to result in a direct or indirect impacts to any historic resources, GPA Consulting (GPA) prepared a technical report to identify built historical resources on and in the vicinity of the Project Site, to assess any potential impacts the Project may have on the identified historical resources, and to recommend mitigation measures, as appropriate. The Historical Resources Technical Report for 6300 West 3rd Street, Los Angeles, CA, dated February 2019, is presented in its entirety in Appendix B to this Initial Study. As part of this analysis, GPA established a study area that includes the Project Site and parcels within a 400-foot radius¹⁹ of the Project Site to account for potential impacts on historical resources identified in the vicinity. On December 18, 2018, the Department of City Planning Office of Historic Resources confirmed the conclusions of the Report. The findings of the Historical Resources Technical Report are summarized below.

As previously mentioned, the Project Site is currently improved with an approximately 214,736 square-foot retail center, comprised of five commercial/retail buildings and paved surface parking. All five buildings were built between 1961 and 1962.²⁰ The existing buildings on the Project Site are not currently listed under national, state, or local landmark or historic district programs and are not identified as significant in any previous historic resource surveys of the area. Furthermore, analysis in this report confirms that there are no historic resources on the Project Site.

However, there are 10 listed and potential historical resources in the study area. These include one property designated as a Los Angeles Historic-Cultural Monument as well as three properties and one historic district listed or identified as eligible for listing in the National Register of Historic Places, California Register of Historical Resources, and/or as a Los Angeles Historic-Cultural Monument or Historic Preservation Overlay Zone. Specifically, the Proposed Project is located across 3rd Street from the historic Original Farmer's Market, at 6333 West 3rd Street (Los Angeles HCM No.543), and directly adjacent to the Hancock Park Elementary School, at 408 South Fairfax

¹⁹ This 400-foot radius was established to account for indirect impacts on historical resources identified in the vicinity. Historical resources beyond this radius were not included in the study area because the Proposed Project would have no potential to directly or indirectly impact these resources or their setting as areas beyond 400 feet would be out of the primary view.

²⁰ City of Los Angeles Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed June 2018.

Avenue, the former of which are listed in the California Register of Historical Resources and the latter as eligible for the National Register.

Out of an abundance of caution, for the purposes of the analysis, individual properties and contributing properties to historic districts identified as eligible for federal, state, or local historic designation through SurveyLA were presumed to be historical resources. The threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether the proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the historical resource is materially impaired and no longer conveys its significance.

The Historical Resources Technical Report analyzed both direct impacts on any historical resources on the site, and indirect impacts the Project could have on the historical resources in the study area. The Report that concluded the Proposed Project would have no significant direct impacts on historical resources, provided that there are no historical resources on the Project Site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. The report also concluded that the Proposed Project would have a less than significant impact on the 10 historical resources in the study area because, while development on the Project Site would introduce a new visual element to the immediate surroundings of these historical resources, the Proposed Project would not result in a substantial adverse change to the integrity of the historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA. Impacts would be less than significant, and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact With Mitigation Incorporated. To determine the potential for the Proposed Project to result in a direct or indirect impacts to any archaeological resources, SWCA was retained to prepare a technical archaeological resources assessment of the Project Site and its vicinity, to assess any potential impacts the Project may have on the identified archaeological resources, and to recommend mitigation measures, as appropriate. The Archaeological Resources Assessment for the 6300 West Third Street Project, Los Angeles, Los Angeles County, CA, dated February 2019, is included in its entirety in Appendix C to this Initial Study.

SWCA conducted a California Historical Resources Information System (CHRIS) search for the Project Site plus a 0.5-mile radius on July 5, 2018, at the South Central Coastal Information System (SCCIC) located at California State University, Fullerton. Based on the information presented in the Archaeological Resources Assessment, a CHRIS records search and archival research identified 12 previously recorded resources within a 0.5-mile radius of the Project Site, none of which were located within the Project Site. Resources identified in the 0.5-mile radius include one Historic-period archaeological site (P-19-002964) documented east of the Project Site, and three Historic- and Prehistoric-period archaeological sites (P-19-000159, P-19-001261, and P-19-003945). P-19-000159 includes Native American human remains, commonly known as the La Brea Woman, recovered in 1915 from asphalt seeps in the La Brea Tar Pits 0.7 km (0.4 miles) to the southeast of the project site. P-19-001261 is a Historic period refuse pit identified near the prehistoric site in the La Brea Tar Pits. P-19-002964 consists of an early 20th century refuse scatter and brick foundation feature documented less than 0.3 miles west of the Project Site during construction monitoring for the Park La Brea housing development on the south side of 3rd Street between the Project Site and Hauser Boulevard. P-19-003945 includes the Gilmore adobe and historical assemblage located to the north of the project site in the current location of

the Farmer's Market.

The record of industrial uses on the Project Site originated in 1890s with the discovery of the Salt Lake Oil Field and development under ownership of Arthur Gilmore. The Gilmore Oil Company constructed at least two wells in the project site, as well as three storage tanks and associated structures. Historic-period archaeological resources could be preserved below the current ground surface, including non-native sediments identified as artificial fill within the Project Site. Specifically, there is potential to encounter structural remains, features, and artifacts associated with industrial use of the Project Site beginning in the 1890s. This is further suggested by the presence of similar resources recovered during construction monitoring for the Park La Brea housing development in parcels east of the current Project Site on the south side 3rd Street. For these reasons, SWCA finds the Project Site has a moderate sensitivity for containing Historic-period (non-Native American) archaeological resources.

SWCA received the results of a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on July 16, 2018. The NAHC's SLF results were negative. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area. The nearest named Gabrielino villages are all located between 9.5 and 12 km (5.9 and 7.5 miles) from the Project Site. Other unnamed Native American settlements have been documented approximately 4.5 km (2.8 miles) south of the Project Site along the former course of the Los Angeles River (now Ballona Creek). The La Brea Tar Pits served as an important source of asphaltum for Native Americans dating back at least 10,000 years. Other water features including perennial springs and small wetlands are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains within approximately 1.9 to 3.1 miles of the Project Site would have been frequented by Native Americans. The proximity to these natural resources, especially the asphaltum source, suggests an increased level of sensitivity for prehistoric archaeological resources above background levels, specifically remains from a temporary camp identified by the presence of flaked stone tools, tool-making debris, stone milling tools, shell, fire-altered rock, and sediment discoloration or carbonization. It is possible that deeply buried prehistoric archaeological resources can occur within the alluvial sediments identified below the artificial fill. Given the increased level of sensitivity based on proximity to an important asphaltum source and Prehistoric-period site with human remains at the La Brea Tar Pits, SWCA finds the project site has a moderate sensitivity for containing Prehistoric-period or Historic-Period Native American archaeological resources.

The depth of excavation for the project is approximately 30 feet below the surface, which would require excavation of the underlying alluvial sediments and removal of the overlying artificial fill. The potential for unidentified archaeological resources within the project site is found to be moderate. Specifically, there is potential to encounter structural remains, features, and artifacts associated with the Historic-period industrial use of the Project Site beginning in the 1890s, and prehistoric artifacts or features associated with a temporary camp deeply buried within native alluvial soils below or (less likely) intermixed with artificial fill or otherwise recently disturbed sediments. Prehistoric artifacts and features include flaked stone tools, tool-making debris, stone milling tools, shell, sediment discoloration or carbonization, and depressions or other features indicative of a former living surface. If present, the archaeological resource could be used to answer important research questions, would be considered eligible for listing in the California Register of Historic Resources (CRHR) under Criterion 4, and therefore meet the qualifications of a historical resource or unique archaeological resource under CEQA.

Considering that such a Historic- or Prehistoric-period archaeological resource would qualify for the CRHR and be considered a unique archaeological resource, the Project Site has not been

previously inspected for the presence of the resource below the surface, the moderate sensitivity for the presence of the resource, the subtle nature of the archaeological materials. Construction activities on the site would comply with applicable regulatory measures to minimize impacts on known and unknown archeological resources. In addition, considering the location of the site, and the potential for archeological resources to be present on it, the Archaeological Resources Assessment contains measures designed to reduce potential impacts to less than significant levels. These measures include: retaining a qualified archaeologist, preparing an Archaeological Resources Mitigation Monitoring Program, implementing a Worker Environmental Awareness Program, and conducting archaeological resources monitoring (see MM Arch-1 through MM Arch-4, below). These measures contain performance standards to ensure that any discovered resources are not significantly impacted. Therefore, regulatory compliance and adherence to these measures will reduce impacts of the project to archaeological resources to a less-than-significant level.

Mitigation Measures

MM Arch-1: Retain a Qualified Archaeologist. Prior to the issuance of a demolition permit, the project proponent shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's (SOI) Standards for professional archaeology, during the excavation phase to carry out and ensure proper implementation of the mitigation measures related to archaeological resources. The qualified archaeologist shall submit a letter of retention to the project proponent and City of Los Angeles Department of City Planning (DCP) no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI standards.

MM Arch-2: Prepare an Archaeological Resources Monitoring and Mitigation Program (ARMMP). Prior to the commencement of demolition and excavation, an ARMMP shall be prepared. The components and performance standards for the ARMMP shall include, but not be limited to, a construction worker training program (described in MM Arch-3), monitoring protocol for demolition and excavation activities, discovery and processing protocol for inadvertent discoveries of archaeological resources, and identification of a curation facility should artifacts be collected. The ARMMP shall identify areas that require monitoring, provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving archaeological remains are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spotchecking) may be appropriate. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, and spatial distribution of archaeological resources identified. The ARMMP shall also summarize the requirements for tribal coordination in the event of an inadvertent discovery of Native American archaeological resources, including the applicable regulatory compliance measures or conditions of approval for the inadvertent discovery of tribal cultural resources to be carried out in concert. The ARMMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5

of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1.

MM Arch-3: Worker Environmental Awareness Program (WEAP) Training. Before the commencement of initial demolition or excavation at the project site, the retained qualified archaeologist or their designee shall provide a WEAP training to on-site project personnel responsible for supervising demolition and excavation (i.e., foreman or supervisor) and machine operators. The WEAP training shall brief construction crews regarding the regulatory compliance requirements and applicable mitigation measures that must be adhered to during demolition and excavation activities for the protection of archaeological resources. As an element of the WEAP training, the qualified archaeologist or their designee shall advise the construction crews on proper procedures to follow if an unanticipated archaeological resource is discovered during construction. The qualified archaeologist or their designee shall also provide the construction workers with contact information for the qualified archaeologist and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of archaeological resources that would require notification of the archaeologist, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, project proponent or their designated project supervisor. Within 5 days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the project proponent.

MM Arch-4: Monitor for Archaeological Resources. Before the commencement of demolition or excavation activities, an archaeological monitor shall be present during ground disturbing activities as stipulated in the ARMMP. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations. The field observations shall include assessment of the geoarchaeological setting and whether sediments are identified that are no longer capable or unlikely to contain archaeological material (i.e., sterile), which may be encountered prior to reaching the total depth of excavation expected for the project. If initial archaeological monitoring identifies low archaeological sensitivity (i.e., sterile soil strata) below a certain depth or within a certain portion of the project site, a corresponding reduction of monitoring coverage would be appropriate. In the event that potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 8 meters [25 feet]) shall stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the qualified archaeologist. If the discovery is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC 21083.2(g), the qualified archaeologist shall coordinate with the project proponent and

DCP to develop a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and if it is determined avoidance is not feasible, treatment may include archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

Within 14 days of concluding the archaeological monitoring, the qualified archaeologist shall prepare a memo stating that the archaeological monitoring requirement of the mitigation measure have been fulfilled and summarize the results of any archaeological finds. The memo shall be submitted to the project proponent and DCP. Following submittal of the memo, the qualified archaeologist shall prepare a technical report documenting the methods and results of all work completed under the ARMMP, including, if any, treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. Once laboratory analysis is complete, any recovered archaeological materials shall be curated at a public, non-profit research institution that will ensure their long-term preservation and allow access to interested scholars. Should no such institutions accept the materials, they shall be donated to an educational institution or historical society. The format and content of the report shall follow the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Any archaeological resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a qualified archaeologist and submitted to DCP within 120 days of completion of the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

c. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))?

Less Than Significant Impact. No known human burials have been identified on the Project Site or within its vicinity. However, as previously mentioned, the depth of excavation for the project is approximately 30 feet below the surface; therefore, unknown human remains could be found on the Project Site during construction activities, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. 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 Section 5097.98. Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains, including those interred outside of dedicated cemeteries, would be less than significant. Therefore, impacts would be less than significant, and no further analysis of this issue is required in the EIR.

VI. ENERGY

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

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

Less Than Significant Impact. The Proposed Project would be constructed in accordance with all applicable laws and regulations, including applicable state and federal laws, and building regulations pursuant to the LAMC and LA Green Building Code that are intended to promote efficient utilization of resources and minimize environmental impacts. For example, construction activities would be required to comply with the Air Resources Board's Airborne Toxic Control Measure (ATCM) to limit idling of diesel-fueled commercial motor vehicles to no longer than five minutes at any location (Title 13, C.C.R Sec. 2485). Pursuant to LAMC Section 99.04.408, the Proposed Project shall meet a construction waste reduction of at least 50 percent.

With respect to Project operations, the Proposed Project would obtain energy from the Los Angeles Department of Water and Power (LADWP), which has committed to diversify its portfolio of energy sources to achieved 35 percent renewables by 2020. Furthermore, the Proposed Project would be designed and constructed to meet LA Green Building Code standards, where applicable. The Proposed Project would include ENERGY STAR-rated appliances and install energy efficient boilers, heaters and air conditioning systems. Additionally, pursuant to LAMC Section 99.04.303.4, a 20 percent reduction in the overall use of potable water within a building shall be provided. As the Proposed Project would be developed to meet or exceed the energy efficiency standards of the LEED Certified level, the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy sources and impacts would be less than significant. However, Appendix F of the State CEQA Guidelines provides that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Therefore, the energy use and conservation features of the Proposed Project will be further analyzed in the scope of the EIR.

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

Less than Significant Impact. State plans adopted for the purposes of promoting energy efficiency include the California Renewable Portfolio Standard, the Clean Energy and Pollution reduction Act of 2015 (CA Senate Bill 350), the California Air Resources Board's "In-Use Off-

Road Diesel Fueled Fleets Regulation” and “Advanced Clean Cars Program,” 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,” and the California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Local plans adopted for the purposes of promoting energy efficiency include the *City of Los Angeles Sustainable City pLAn*, the City of Los Angeles Green Building Code, and the LADWP’s 2017 Power Strategic Long-Term Resource Plan (SLTRP). As stated above, the Proposed Project would be constructed in accordance with all applicable laws and regulations, including applicable state and federal laws, and building regulations pursuant to the LAMC and LA Green Building Code that are intended to promote efficient utilization of resources and minimize environmental impacts. Thus, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant. However, as discussed above, Appendix F of the State CEQA Guidelines provides that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Therefore, a discussion of the Proposed Project’s consistency with state or local plans for renewable energy or energy efficiency will be further analyzed in the scope of the EIR.

VII. GEOLOGY AND SOILS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following analysis is based on the findings and recommendations of the following technical report that has been prepared for the Proposed Project:

- Geocon West, Inc., Geotechnical Investigation for the Proposed Mixed-Use Development – The Southeast Corner of 3rd Street and Fairfax Avenue, Los Angeles, California, Tract 215, Lot 12, Arb 1 & 2, Revised November 16, 2018 (“Geotechnical Investigation Report”).

This report is included in Appendix E to this Initial Study.

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. Based on the Geotechnical Investigation Report, the Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The closest surface trace of an active fault to the Project Site is the Hollywood Fault located approximately 1.8 miles north of the Project Site. Other nearby active faults include the Newport-Inglewood Fault Zone, the Santa Monica Fault, the Raymond Fault, the Verdugo Fault, the Sierra Madre Fault Zone, and the Palos Verdes Fault Zone located approximately 2.0 miles southwest, 3.2 miles west, 8.2 miles east-northeast, 9.0 miles northeast, 15.5 miles north, and 17.3 miles southwest of the Project Site, respectively. The active San Andreas Fault Zone is located approximately 36 miles northeast of the Project Site. In addition, the ground rupture hazard at the Project Site is considered low based on an onsite geotechnical investigation.²¹ The Alquist-Priolo Earthquake Fault Zoning Act prohibits the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from

²¹ Geocon West Inc., (2018). See Appendix E to this Initial Study.

surface faulting. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Local agencies are required to verify through a site-specific geologic investigation, that proposed buildings will not be constructed across active faults. Based on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, the Proposed Project is not located in an Earthquake Fault Zone and would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, impacts are less than significant and no further analysis of this issue is required in the EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within the seismically active area of Southern California and, therefore, could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. These hazards and their potential impact can be mitigated with proper seismic design. The intensity of ground shaking is highly dependent upon the distance of the fault to the Project Site, the magnitude of the earthquake, and the underlying soil conditions. Construction in this area shall be designed with accepted engineering practices and in compliance with current building codes that accommodate strong seismic ground motion.

The Proposed Project would adhere to current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and design recommendations set forth in the Project's Geotechnical Investigation Report so that the proposed structure may withstand typical seismic ground shaking and seismically induced settlement. In addition, geotechnical evaluations of the Proposed Project would follow the guidelines presented in CGS Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards (other than fault rupture); and the Proposed Project's design and construction would require Department of Building and Safety approval. Thus, impacts related to strong seismic shaking would be less than significant based on compliance with regulatory measures and construction that complies with applicable building codes designed to minimize potential damage from seismic ground shaking.

The Geotechnical Investigations concluded that, from a geotechnical engineering standpoint, the Project Site can be developed with the Proposed Project, provided the recommendations in the Geotechnical Investigation Report are followed and implemented during design and construction. The Proposed Project would comply with the recommendations specified in the Geotechnical Investigation Report are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. Also, the design and construction of the Proposed Project shall conform to the City of Los Angeles Building Code seismic standards as approved by the Department of Building and Safety. The Proposed Project would be required to comply with the conditions contained within the Department of Building and Safety's Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. Thus, with compliance with regulatory compliance measures, construction and operation of the Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. As such, impacts associated with seismic hazards would be less than significant and no further analysis of this issue is required in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant 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. The current standard of practice, as outlined in the “Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California” and “Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California” requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure.

The Geotechnical Investigation Report concluded, based on the State of California Seismic Hazard Zone Map for the Hollywood Quadrangle and review of the County of Los Angeles Safety Element, that the Project Site is not located within an area designated as having a potential for liquefaction. Based on these considerations, the potential for liquefaction and associated ground deformations beneath the Project Site is considered very low. Therefore, with compliance with the Los Angeles Building Code and the Soils Report Approval Letter to the satisfaction of the Department of Building and Safety, the Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure including liquefaction. As such, seismic impacts pertaining to liquefaction would be less than significant and no further analysis of this issue is required in the EIR.

iv. Landslides?

Less Than Significant Impact. The topography at the Project Site is relatively level and the topography in the immediate Project Site vicinity slopes gently to the west-southwest. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area; and the County of Los Angeles Safety Element indicates the Project Site is not located within an area identified as a “hillside” area or an area having a potential for slope instability. In addition, the Geotechnical Investigation Report states the Project Site is not within an area identified as have a potential for seismic slope instability, that there are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the probability of landslides, including seismically induced landslides, is considered to be low and the Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides. Therefore, impacts are less than significant and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact.

Construction

Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, the implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations would reduce the potential impacts to less than significant. The earthwork anticipated at the Project Site would include excavations to depths of approximately 30 feet below grade to accommodate the three

subterranean parking levels. The Geotechnical Investigation Report concluded that, based on the depth of the excavation and the proximity to the property lines, city streets and adjacent offsite structures and improvements, excavation of the proposed subterranean levels would require sloping and/or shoring in order to provide a stable excavation. Additionally, the Proposed Project would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified.

Furthermore, pursuant to Chapter IX, Division 70 of the LAMC, all earthwork activities require grading permits from the Department of Building and Safety, which include requirements and standards that address grading, excavations, and fills. LAMC Section 91.7013, Erosion Control and Drainage Devices, discusses appropriate devices to control erosion during construction. LAMC Section 91.3307 further requires construction projects to protect adjoining public and private properties from damage during construction, remodeling and demolition work. Provisions would be made to control water runoff and erosion during construction or demolition activities. Further, the Proposed Project would be required to incorporate a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system under the National Pollution Discharge Elimination System (NPDES). Compliance with regulatory measures would ensure that impacts are less than significant with respect to erosion or loss of topsoil during the construction of the Proposed Project.

Operation

The potential for soil erosion during the ongoing operation of the Proposed Project is low due to the generally level topography of the Project Site, and the fact that the Project Site would be mostly paved-over or built upon with little soil exposure. As such, impacts would be less than significant impact and no further analysis of this is required in the EIR.

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

Less Than Significant Impact. The Geotechnical Investigation concludes that the consolidation and hydrocollapse potential of the alluvium at the depth of the proposed construction is low. The in-situ dry densities are high for samples taken at the foundation level, and these soils have a very low potential for consolidation. Lateral spreading at the Project Site is considered nil.

Laboratory testing indicates that the alluvium at the depth of the proposed foundations has a low potential for consolidation and hydrocollapse. The alluvium at the Project Site is competent and capable of supporting engineered structures and appurtenances. The Geotechnical Investigation concludes that the Project Site is suitable for the Proposed Project from a geotechnical standpoint and that the Project Site can be improved without hazard of landslide, slippage, or settlement, and improvement can occur without similar adverse impacts on adjoining properties with adherence with regulatory compliance measures, good construction practices, and recommendations specified in the Geotechnical Investigation. The Proposed Project would comply with the City of Los Angeles Building Code, which would ensure that geological impacts pertaining to soil instability would be less than significant. The Proposed Project would comply with the recommendations contained in the Geotechnical Investigation and the Soils Approval Letter issued by the Department of Building and Safety. Therefore, compliance with regulatory measures would reduce geologic impacts relating to soil instability to less-than-significant levels.

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

Less Than Significant Impact. The soils at the Project Site consist of fill and alluvium. The artificial fill generally consists of brown dark brown or grayish brown sand, silty sand, sandy silt, and silt. The artificial fill is characterized as slightly moist and soft or very loose to loose. The alluvium consists of brown to dark brown, grayish brown, olive brown, light gray to dark gray, or yellowish brown to dark yellowish brown interbedded sand, sand with silt, silty sand, clayey sand, clay, clayey silt, silt, and sandy silt. The alluvial soils are primarily fine- to medium-grained, slightly moist to wet, and very loose to very dense or soft to stiff. The upper five feet of existing soils encountered during Geotechnical Investigation are considered to have a “very low” expansive potential and are classified as “non-expansive” based on the 2013 California Building Code Section 1803.5.3. Thus, the Geotechnical Investigation concluded the foundations and slabs at the ground surface would derive support in these materials and, based on the depth of the proposed subterranean levels, the Proposed Project’s structure would not be prone to the effects of expansive soils.

Furthermore, all construction and building activities would comply with the Los Angeles Building Code and the Department of Building and Safety’s Soils Report Approval Letter; and all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With adherence to the City of Los Angeles Department of Building and Safety requirements and regulatory compliance measures, the Proposed Project would not exacerbate expansive soil conditions on-site. As such, impacts would be less than significant and no further analysis of this issue is required in the EIR.

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

No Impact. This question would apply to a project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urban area served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur, and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact With Mitigation Incorporated. To determine the potential for the Proposed Project to result in a direct or indirect impacts to any paleontological resources, SWCA was retained to prepare a technical paleontological resources report of the Project Site and its vicinity, to assess any potential impacts the Project may have on the identified paleontological resources, and to recommend mitigation measures, as appropriate. The Paleontological Resources Report for the 6300 West Third Street Project, Los Angeles, Los Angeles County, CA, dated October 2018, is included in its entirety in Appendix D to this Initial Study.

As part of the paleontological resources research, a records search was requested from the Natural History Museum of Los Angeles County (LACM) on April 4, 2018, and completed in September 2018.

The Project Site is currently paved and consists of surface parking and existing buildings. The subsurface of the site consists primarily of older alluvium, with the southeastern corner composed of younger alluvium overlying older alluvium at an estimated depth of three feet. Older alluvium has high paleontological sensitivity because it is of an age known to preserve fossil resources and has a well-established record of fossil preservation throughout the Los Angeles Basin. No previously recorded fossil localities were identified within the Project Site during the records search. Based on a records search from the LACM, records of fossil localities were found from within one kilometer (0.62 miles) of the Project Site.

The depth of excavation for the project is approximately 30 feet below the surface within the older alluvium. Older alluvium has a record of preserving fossil resources in the Los Angeles Basin. Construction activities on the Site would comply with applicable regulatory measures to minimize impacts on known and unknown paleontological resources. In addition, considering the location of the Site, and the potential for paleontological resources to be present on it, this report contains measures designed to reduce potential impacts to less than significant levels, which include retaining a qualified paleontologist, preparing a paleontological resource monitoring and mitigation program, conducting a worker environmental awareness program training, and monitoring for fossil resources (see MM Paleo-1 through Paleo-4, below). These measures contain standards to ensure that any discovered resources are not significantly impacted. The measures have been developed in accordance with the standards established by the Society of Vertebrate Paleontology (SVP) and are consistent with the guidance in the Conservation Element of the City of Los Angeles General Plan. Similar mitigation measures have been used throughout California to protect paleontological resources while allowing timely completion of construction. Therefore, regulatory compliance and adherence to these mitigation measures will reduce impacts of the project to paleontological resources to less-than-significant levels.

Mitigation Measures

MM Paleo-1: Retain a Qualified Paleontologist. Prior to the issuance of a grading permit, the project proponent shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Society of Vertebrate Paleontology (SVP) standards for a Principal Investigator or Project Paleontologist, to carry out all mitigation measures related to paleontological resources. The qualified paleontologist shall submit a letter of retention to the project proponent no fewer than 15 days before any grading or excavation activities commence. The letter shall include a resume for the qualified paleontologist that demonstrates fulfillment of the SVP standards.

MM Paleo-2: Prepare Paleontological Resources Monitoring and Mitigation Program (PRMMP). Before any grading activities start, the qualified paleontologist shall prepare a PRMMP. This program shall contain specific monitoring and mitigation requirements including construction worker training, monitoring protocols, protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate, fossil salvage and data collection protocols in the event of an unanticipated discovery, curation facilities for any significant fossils that may be salvaged, and a final report summarizing the results of the program. The PRMMP shall adhere to and incorporate the performance standards

and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. The qualified paleontologist shall submit the final PRMMP to the project proponent and the Department of City Planning (DCP) for their records before project excavation activities start.

MM Paleo-3: Worker's Environmental Awareness Program (WEAP). The qualified paleontologist shall develop and oversee implementation of a WEAP to train the construction crew on the requirements for preserving fossil resources, as well as procedures and standards to follow, in the event of a fossil discovery. This training program shall be given to the crew before excavation work commences and shall include documentation for the workers that includes that memorializes the standards and protocols of the WEAP training.

MM Paleo-4: Monitor for Fossil Resources. All ground disturbances in the project site that occur in undisturbed sediments mapped as older alluvium (Qao) shall be monitored. Excavation or any other ground disturbances occurring in the southeast corner of the project site within younger alluvial sediments shall be monitored when the ground disturbances exceed one meter (three feet) in depth. Monitoring shall be conducted by a qualified paleontologist or under the supervision of qualified paleontologist, as stipulated in the PRMMP. The qualified paleontologist may periodically inspect construction activities to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or stopped entirely if determined adequate by the qualified paleontologist. Paleontological monitoring shall include inspection of exposed sedimentary units during active excavations within sensitive geologic sediments.

In the event of a fossil discovery, whether by the paleontological monitor or a member of the construction crew, all work shall cease in a 15-meter (50-foot) radius of the find while the qualified paleontologist assesses the fossil and documents its discovery. Paleontological monitors shall record pertinent geologic data and collect sediment samples from the fossil localities. The qualified paleontological monitor shall follow the SVP's 2010 Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources if the resource requires salvage. A repository, e.g., LACM, shall be identified and a curatorial arrangement shall be signed prior to collection of fossils. Recovered fossils shall be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.

Within 14 days of concluding the paleontological monitoring, the qualified paleontologist shall prepare a memorandum stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The memo shall be submitted to the project proponent and DCP. Following submittal of the memo, the

qualified paleontologist shall prepare a technical report documenting the methods and results of all work completed under the PRMMP, including, if any, treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

Responses a-b: Potentially Significant Impact. Global climate change describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide [CO₂], methane [CH₄], and nitrous dioxide [N₂O]) that capture heat radiated from the Earth's surface, which in turn warms the atmosphere. This natural phenomenon is known as the "greenhouse effect." Excessive human-generated greenhouse gas emissions can affect the global climate. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Construction and operation of the Proposed Project has the potential to generate greenhouse gas emissions, either directly or indirectly, which may have a significant impact on the environment. Thus, the Proposed Project's generation of greenhouse gas emissions and consistency with applicable plans, policies and regulations adopted for the purpose of reducing the emission of greenhouse gases will be further analyzed in the scope of the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based on the findings and recommendations of the following technical reports that have been prepared for the Proposed Project:

- Evista, Limited Asbestos and Lead Inspection 3rd and Fairfax - 6300 West 3rd Street Los Angeles, California, September 21, 2018. (Appendix F-1)
- Evista, Hazardous Waste Inventory Report, 3rd and Fairfax - 6300 West 3rd Street Los Angeles, California, January 29, 2018 and February 2, 2018. (Appendix F-2)

- Arcadis, Phase I Environmental Site Assessment Report, Town and Country Retail – 6310-6330 W. 3rd Street Los Angeles, California, 90036, May 26, 2017. (Appendix F-3)
- Northgate Environmental Management, Inc., Phase II Environmental Site Assessment, 3rd and Fairfax – 6300 to 6332 West 3rd Street, Los Angeles California, March 1, 2018. (Appendix F-4)
- Terra-Petra Environmental Engineers, Report of Methane Soil Gas Testing - Proposed Redevelopment - 370 S. Fairfax Ave., 6300-6370 W. 3rd St. and 347 S. Ogden Dr., Los Angeles, CA 90036 Tract: TR 215 Block: None Lot(s): PT 12, September 18, 2018. (Appendix F-5)

These reports are included in Appendix F to this Initial Study.

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

Less Than Significant Impact. The Proposed Project includes the demolition of 151,048 square feet of existing commercial uses and the construction of a mixed-use project with up to 331 dwelling units and approximately 83,994 square feet of new commercial/retail space. Construction of the Proposed Project could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Based on the findings of the Limited Asbestos and Lead Inspection performed by Evista (2018), some of the materials surveyed and sampled do contain asbestos containing materials (ACM). Disturbance of any ACM material would be handled in accordance with applicable local and state regulations (which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529). In addition, lead-based paint (LBP) was detected on certain surfaces tested. Disturbance of any LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and the US Department of Housing and Urban Development (HUD) and 2010 Toxic Substances Control Act (TSCA) Renovation, Repair and Painting Rule (RRP) in pre-1978 target housing and child-occupied facilities. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. In addition, the recommendations contained in the Hazardous Waste Inventory Report regarding treatment of ACM and LBP materials encountered during construction activities would be followed to further minimize potential impacts.

Furthermore, potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Adherence to all applicable rules and regulations pertaining to the use, storage, and transport of potentially hazardous materials would reduce potentially significant impacts to less-than-significant levels.

During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations. The operation of the mixed-use residential and commercial land uses would not use, transport, or require the disposal of hazardous materials. The Proposed Project would not routinely transport, use, or disposal of hazardous materials in the normal course of operations. The Proposed Project would comply with current regulations set by the Department of Building and Safety.

Therefore, the proposed construction and operational activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As such, impacts would be less than significant and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact with Mitigation Incorporated. The following analysis is based on the Report of Methane Soil Gas Testing - Proposed Redevelopment - 370 South Fairfax Avenue, 6300-6370 West 3rd St and 347 South Ogden Drive, Los Angeles, CA 90036 Tract: TR 215 Block: None Lot(s): PT 12, prepared by Terra-Petra Environmental Engineers, dated January 31, 2019. The Report of Methane Soil Gas Testing is contained in its entirety in Appendix F-5 to this Initial Study.

Terra-Petra conducted a methane soil gas investigation at the subject site to determine the methane soil gas mitigation requirements in connection with the proposed redevelopment. The Project Site has been determined to be located within a City of Los Angeles designated Methane Zone. Based on the Division of Oil, Gas and Geothermal Resources (DOGGR) records and the Munger Map Book (1987), one plugged and abandoned oil well is present on the property. The well is identified as Salt Lake 99 (API number 037-15229), Lease Salt Lake Well #99 County Los Angeles [037] District 1 Operator Chevron U.S.A. Inc. Well Status: Plugged & Abandoned September 20, 1930. Based on the proximity of this oil well and the location of the site within a previously existing oil well field, the Proposed Project is expected to be highly susceptible to methane gas intrusion. The investigation was designed to detect the presence of any elevated levels of methane gas in the in-situ soils underlying the foundations of the existing buildings.

Methane soil gas was detected in all shallow and deep probes with the exception of Shallow Probe #4. Methane concentrations ranged from 3,000 ppmv to 895,000 ppmv, with the highest measurement recorded in Deep Probe #4. The full results of the soil gas testing measurements were recorded in a City Of Los Angeles approved format as presented in the Exhibit 5, Form 1 – Certificate of Compliance for Methane Test Data (See Appendix D to this Initial Study).

Methane gas is combustible with a lower explosive limit (LEL) of approximately 5%, v/v (percent volume) in air. In structures, methane concentrations above 25% of the LEL (above 1.25%, v/v) are considered to be regulatory action levels above which gas concentrations must be mitigated. For buildings to be constructed in a methane zone, the City of Los Angeles Department of Building and Safety considers even non-detectable readings of methane soil gas concentrations (0.0%, v/v) to be the action level at which soil gas concentrations must be mitigated. Thus, methane mitigation is mandatory for any new construction in the Methane Zone.

Based on the historic ground water table, the elevated methane readings produced on site, and the LADBS action levels presented above, the site is deemed a Methane Zone – Level V, All Pressures. Based on site conditions, a “V-Bottom” foundation with a minimum one percent slope towards the building perimeter designed to withstand hydrostatic pressures would be acceptable. The “V-Bottom” foundation and Methane Zone Level V system will be in compliance with LADBS requirements. In conjunction with the following mitigation measure, the Proposed Project will not 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, and impacts would be less than significant.

Mitigation Measures

MM HAZ-1

- Areas with a Mat Foundation shall be fitted with an impermeable methane barrier membrane.
- The bottom side of the foundation slab shall have a one percent “V” Bottom slope to serve as the pressure relief venting system.
- A minimum four-inch thick aggregate layer shall be placed beneath the slab to assist in conveying methane gas from beneath the structure.
- An impermeable methane gas/waterproofing/tar barrier shall be installed at all below grade walls.
- If an Oil Well is located on the property beneath a new building, it shall be fitted with a Vent Cone and Venting System as required by the State of California Division of Oil and Gas.
- Electrical & communications conduit seals that prevent methane gas intrusion shall be installed at all dry utility conduits.
- Utility trench dams that prevent methane gas intrusion shall be installed at the exterior sides of the building.

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

Less Than Significant Impact. The Hancock Park Elementary School, a Los Angeles Unified School District school, is located immediately south of the Project Site at 408 South Fairfax Avenue. No hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for housing keeping and janitorial purposes would be present at the Project Site. These type of substances are not considered acutely hazardous. In addition, use of these substances would comply with State Health Codes and Regulations, which regulate use, emission and disposal of materials. Thus, the Proposed Project’s operational impacts would be less than significant.

However, the Proposed Project does have the potential to emit potentially hazardous materials, substances, or waste during the construction period, as discussed above, regarding ACMs, LBPs, and other construction related activities that could emit hazardous emissions. The construction activities are unlikely to emit acutely hazardous materials or substances (such as ACMs and LBP), because demolition and construction are subject to strict regulatory requirements for handling and treatment of any hazardous materials associated with construction. Nonetheless, considering the proximity of the Hancock Elementary School to the Project Site, whether the Proposed Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in a manner that could result in a significant impact to the adjacent school will be further analyzed in the scope of the EIR.

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

Less Than Significant Impact. Based on the Phase I ESA Report (Arcadis, 2017), the Project Site address 6310 West Third Street is listed under the name Kmart in the HAZNET database.²² Kmart is listed as generating hazardous waste under manifest from 1995 through 2015. Typical waste streams included waste oil and mixed oil, unspecified solvent mixture, off-specification, aged or surplus organics, asbestos-containing waste, alkaline solution without metals, latex waste, and acidic liquids. The listing in the HAZNET database indicates proper offsite disposal of hazardous waste activities was recorded under manifest and does not in itself indicate an environmental concern for the Project Site. The Proposed Project would demolish and remove the Kmart use from the site. The Project Site address 6360 West Third Street is also listed under the name CVS Pharmacy No. 9661 in the Resource Conservation and Recovery Large Quantity Generator (RCRALQG) and Enforcement and Compliance History Online (ECHO) databases. The RCRA database provides a variety of waste codes for wastes generated at the site and indicates there were no violations. The same information is provided in the Environmental Protection Agency's (EPA) ECHO database.

The remaining site addresses were not listed in any of the databases searched. Therefore, the Proposed Project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment caused in whole or in part from exacerbation of existing environmental conditions. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

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

No Impact. The nearest public airport to the Project Site is the Santa Monica Airport, located approximately six miles southwest of the Project Site. As such, the Project Site is not within the vicinity of an airport land use plan and no impacts involving airport-related safety hazards would occur. No further analysis of this issue is required in the EIR.

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

Less Than Significant Impact. The Proposed Project would involve new driveways and curb cuts to access the Project Site. While the construction of the Proposed Project may require temporary and/or partial road closures due to construction activities, these activities are not expected to impair or interfere with emergency response plans. According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, Fairfax Avenue and Third Street, immediately adjacent to the Project Site, are the nearest designated disaster routes to the Project Site. Any potential closures of these roadways (in whole or in part) would be coordinated with and approved by the Department of Transportation. Following construction, the Proposed Project may in fact improve onsite circulation and access

²² HAZNET is a California Department of Toxic Substances Control database that records annual hazardous waste shipments, as required by the Resource Conservation and Recovery Act (RCRA). All businesses that use and dispose of hazardous materials are entered into the database.

compared to existing conditions. Nonetheless, in an abundance of caution, and in consideration of the surrounding uses, the potential impacts of the Proposed Project on adopted emergency response or evacuation plans will be further analyzed in the scope of the EIR.

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

No Impact. The Project Site is located in an urbanized area within the City of Los Angeles and is not located in a Very High Fire Hazard Severity Zone.²³ As such, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur, and this issue does not require further analysis of this issue is required in the EIR.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				

²³ City of Los Angeles Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed June 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The following section is based on the following technical report:

- Geocon West Inc., Hydrology And Water Quality Technical Report, 3rd Street and Fairfax Avenue, Los Angeles CA, Tract 215, Lot 12, ARB 1 & 2, dated January 31, 2019.

The Hydrology and Water Quality Technical Report is contained in its entirety in Appendix G to this Initial Study.

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

Less Than Significant Impact. The regulatory setting for surface water quality considers if discharges create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. Impact analysis considers whether 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 analysis also considers if the project complies with applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards.

The Project Site is within the Los Angeles Regional Water Quality Control Board (RWQCB) jurisdiction. Applicable regulations include compliance with NPDES permitting system, Standard Urban Storm Water Mitigation Plan (SUSMP), LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction activities for the Project include demolition of existing commercial buildings and paved parking areas, excavation to approximately 30 feet below grade for foundation and underground parking, building up the structure, and hardscape and landscape around the structure. Based on the historic presence of oil wells on site, exposed and stockpiled soils during construction activities may contain petroleum hydrocarbons and could be subject to erosion and conveyance into nearby storm drains. Dewatering of perched water, which also contains petroleum hydrocarbons, could result in the release of contaminants into the storm sewer or sanitary sewer system. The construction area is greater than one acre, so the Proposed Project would be required to obtain coverage under the NPDES General Construction Activity Permit (Order No. 2009-0009-SWQ).

In accordance with the requirements of this permit, the Applicant would file a Notice of Intent (NOI) and implement a SWPPP that specifies Best Management Practices (BMPs) and erosion control measures to be used during construction. In addition, construction activities are temporary and flow directions and runoff volumes during construction will be controlled. Furthermore, the Proposed Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Water produced during temporary dewatering will be treated to remove contaminants and discharged under applicable permits to the storm or sanitary sewer system. Thus, through compliance with all NPDES General Construction Permit requirements, including preparation of a SWPPP, implementation of BMPs, compliance with applicable City grading regulations, and treatment of dewatering water prior to discharge, the Proposed Project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality during construction.

After completion of the Project construction, appropriate Low Impact Development (LID) Stormwater Quality Control Measures will be implemented on the newly-constructed, mixed-use building. These include the requirement for flow-through planters and flow through tree rings to filter runoff in excess of the Storm Water Quality Design volume (SWQDv) and harvested rainwater used for landscape irrigation. The total volume of runoff will also be reduced by harvesting the SWQDv. Since there are currently no stormwater quality control measures present at the site, the Project will improve the quality and reduce the volume of stormwater runoff compared to existing conditions. Therefore, impacts to water quality standards or waste discharge requirements would be less than significant and no further analysis of this issue is required in the EIR.

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

Less Than Significant Impact. The Project Site is nearly 100 percent impervious. Surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. However, considering the historic high groundwater level and the depth to groundwater encountered in borings, groundwater may be encountered during construction. According to the Hydrology and Water Quality Technical Report, groundwater was encountered in borings B1, B2, B3 and B4 drilled on January 2 and 3, 2018, at depths of 30 feet, 20 feet, 27 feet, and 25 feet below the existing ground surface, respectively. Groundwater was also encountered in the previous borings drilled at the site in June 2017, at depths ranging from 20 to 22 feet beneath the existing ground surface (Krazan, 2017). While the Project will not rely on groundwater for any water supply needs after it is constructed, temporary dewatering may be required for excavation of the foundation and underground parking levels if the water levels in the shallow perched groundwater zone are within the depth of excavation during construction. As shown on Figure 6 of the Hydrology Water Quality Report (See Appendix G to this Initial Study), the extent of the perched groundwater zone is limited to the northern part of east side of the Project Site and is not suitable for potable groundwater supply. Furthermore, the perched groundwater zone is not part of the regional aquifers that provide usable groundwater supplies. The regional aquifers are at least 120 feet below ground surface in the area of the Project Site, which is much deeper than the maximum depth of excavation.

The Project Site is currently developed with commercial buildings and a paved parking lot. As part of the Project, the western side of the Project Site will remain in the same condition, while the existing commercial buildings and parking lot on the eastern side of the site will be replaced with

a mid-rise, mixed-use building. The total area of impervious cover will not materially change as a result of the Proposed Project. Thus, there will be no material change in the amount of rainfall that might percolate through the Project Site to recharge groundwater (i.e. Project conditions are effectively equal to baseline conditions). Therefore, the Proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management of the basin. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site;**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

Less Than Significant Impact. Implementation of the Proposed Project would not increase site runoff or result in substantial changes in the local drainage patterns on the Project Site or the surrounding area. In addition, there are no streams or rivers on or near the Project Site. The Project Site is covered almost completely with impervious surfaces in both the existing and proposed conditions. In fact, development of the Proposed Project will reduce the extent of impervious surfaces on portions of the Project Site due to increased landscaping and filtration areas. Similarly, due to the rainwater harvesting that will occur as part of the Proposed Project, there will be less runoff after construction than under current conditions. Furthermore, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control, which would control potential erosion or siltation issues on and offsite.

Regarding the rate of surface runoff, the Proposed Project would decrease the runoff rate and improve existing conditions. As shown in Table 1: Hydrology Parameters and HydroCalc Results, of the Hydrology and Water Quality Technical Report, peak runoff during a 50-year, 24-hour design storm event, and for the SWQDV, are 58,009 cubic feet and 11,500 cubic feet, respectively, under existing conditions. After completion of the Proposed Project, runoff during the same design storm event, and for the SWQDV, would be reduced to 53,215 cubic feet and 10,440 cubic feet, respectively. Thus, the Proposed Project would reduce the rate and volume of surface runoff. Regarding capacity of existing and planned drainage systems, the Proposed Project would not contribute substantial runoff water that could adversely impact the system. Currently, surface water runoff is directed to the storm drains in the adjacent streets. Existing storm drain lines serving the Project Site are located along South Fairfax Avenue and South Ogden Drive. Surface runoff leaving the Project Site adjacent to South Ogden Drive would be directed onto a storm drain inlet at the intersection of South Ogden Drive and 3rd Street and onto an inlet on the southeast corner of the Project Site, along South Ogden Drive. Surface runoff along West 3rd Street would travel westbound and then southbound along South Fairfax Avenue onto the storm drain inlet approximately 0.1 mile south of the Project Site, along South Fairfax Avenue. These storm drain lines are owned and maintained by the City of Los Angeles. As discussed above, the Proposed Project would reduce the rate and volume of stormwater runoff from the Project Site. It follows that, the Proposed Project would not create or contribute runoff water which would exceed the capacity of the existing storm drain system.

Regarding potential sources of polluted runoff, the Proposed Project would improve existing conditions. Stormwater retention, or treatment BMPs, would be required as part of the Low Impact Development (LID) requirements of the City. Also, potential pollutants from the parking areas associated with the Proposed Project would be subject to applicable NPDES and LID standards, which retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Additionally, any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Furthermore, the Proposed Project would comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality. Thus, the Proposed Project would not create additional sources of polluted runoff.

Therefore, the Proposed Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner that could either result in substantial erosion, substantially increase surface runoff, contribute runoff that could exceed drainage system capacity, create additional pollutants, or impede flood flows. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. The Project Site is located in a Federal Emergency Management Agency (FEMA) designated flood Zone X, meaning that it is in an area of minimal flood hazard and outside of any 100-year flood hazard areas. Ogden Avenue, Fairfax Boulevard, and 3rd Street adjacent to the Project Site, and the property to the north of the Project Site, are within an area identified by FEMA to be subject to a 0.2% chance of annual flooding, which is equivalent to a 500-year recurrence interval. The FEMA Flood Zones are shown in Appendix G. Regarding flood flows, the Proposed Project would not impede or redirect any such flows for the following reasons. The Project Site is not located in an area designated as a flood hazard area. The Project Site is designated as Zone X, which signifies that the area is outside the 0.2 percent annual chance floodplain. In addition, the Project Site is located in an urbanized area, would improve drainage flows, and decrease the rate and volume of stormwater runoff. Thus, the Proposed Project would not impede or redirect floodwater flows.

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

Less than Significant Impact. The Project Site is not located in a flood hazard, tsunami or seiche zone. The Project Site is designated as Zone X, which signifies that the area is outside the 0.2 percent annual chance floodplain.²⁴ The Project Site is located 8.75 miles from the Pacific Ocean at an elevation of 180 feet above sea level. According to the City of Los Angeles General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas²⁵, the Project Site is not within a tsunami hazard area. There are no enclosed water bodies where a seiche could form near the Project Site. Thus, there would be no risk of release of pollutants due to inundation of the Project Site. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

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

²⁴ Federal Emergency Management Agency (FEMA), Flood Insurance Rate Map, Panel Number 06037C1605F, September 26, 2008, website: <https://msc.fema.gov/portal/search?>, accessed April 2018.

²⁵ City of Los Angeles (<https://planning.lacity.org/cwd/gnlpn/saftyelt.pdf>), accessed January 2019.

Less Than Significant Impact. As specified above, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the Proposed Project would be developed with Best Management practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. The Project Site is currently a retail center with a reported percent impervious of 96 percent. As noted in the Hydrology and Water Quality Technical Report contained in Appendix G, infiltration of stormwater would not occur or be permitted by RWQCB. As discussed above, the Proposed Project would comply with the LACDPW Low Impact Development (LID) standards for infill development. It follows that neither construction nor operations on the Project Site are relevant to a water quality control or sustainable groundwater management plan. Therefore, the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant and no further analysis of this issue is required in the EIR.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is currently developed with surface parking and five commercial buildings. The surrounding land uses adjacent to the Project Site are mostly commercial uses, with a school immediately to the south. There are no vacant or undeveloped areas around the Project Site, such that development of the Proposed Project could possibly divide an established community. There are no separation of uses or disruption of access between land uses around the Project Site that would occur as a result of the Proposed Project. The Project Site is zoned C2-1-O, and the General Plan land use designation is Community Commercial. Pursuant to LAMC Section 12.13, the land uses proposed by the Project are permitted uses in the C2 zone and are consistent and compatible with land uses around the Project Site. Figure A-2, Zoning and General Plan Land Use Designations, shows the existing zoning and land use designations on the Project Site and in the surrounding area. All development associated with the Proposed Project would be confined to the existing Project Site and would not disrupt or divide the physical arrangement of the established community. Therefore, impacts would be less than significant and no further analysis of this issue is required in the EIR.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Development of the Project Site is guided by the General Plan of the City of Los Angeles, the Wilshire Community Plan, and the LAMC, which are intended to guide local land use decisions and development patterns. The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City and consists of 11 elements. Those elements that would be most applicable to the Proposed Project are the Framework Element and the Housing Element. The Framework Element provides citywide guidelines and a foundation in which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies on. The Proposed Project is consistent with objectives and policies for multi-family and mixed-use development. These objectives and policies include: provide for the stability and enhancement of multi-family residential neighborhoods and allowing for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved; accommodate the development of multi-family residential units in areas designated in the community plans in accordance with the zoning densities; and improve the quality of new multi-family dwelling units based on the urban form and neighborhood design standards.

In addition, the Wilshire Community Plan provides goals and objectives to that guide development in the Wilshire Community Plan area. The purpose of the plan is to promote an arrangement of land use, circulation, and services, that encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City. The Proposed Project would provide a mixed-use residential and commercial development, which would conform to the objectives identified in the Wilshire Community Plan. Additionally, the Proposed Project would incorporate architectural compatibility and landscaping to protect the character and scale of existing multi-family residential neighborhoods.

The Project Site is also subject to the applicable sections of the City's Los Angeles Municipal Code (LAMC). The Project Site is currently zoned C2-1-O with a General Plan land use designation of Community Commercial. The Proposed Project would be compatible with the applicable sections of the LAMC such as floor area ratio, density, setbacks, open space, vehicle parking, and bicycle parking.

Therefore, the Proposed Project would be consistent with the applicable land use plans, policies, and regulations and impacts will be less than significant. However, to provide comprehensive land use and planning analysis, the EIR will further analyze whether the Proposed Project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

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

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

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?

Responses a and b: No Impact. The Project Site is not located within a Mineral Resource Zone Area (MRZ-2)²⁶ and is not used for mineral extraction. As the Project Site is currently developed with five commercial buildings and paved surface parking, no mineral resources or mineral extraction activities currently exist on the Project Site.

The Project Site is zoned C2-1-O. The "O" designation indicates that the Project Site is located within an Oil-Drilling Supplemental Use District. There are two known oil wells located within the surface parking areas on the Project Site, both of which are associated with Chevron USA, Inc., and have been plugged.²⁷ Well No. 99, which is located on the eastern portion of the Project Site, and any non-abandoned wells encountered during construction, would need to be properly abandoned in accordance with the current requirements of the DOGGR. The second well (Well No. 102) is located on the western portion of the Project Site where no new development is proposed. Any oil well reabandonment conducted on the Project Site would be conducted in consultation with the DOGGR, the Los Angeles County Regional Water Quality Control Board, the City of Los Angeles Department of Building and Safety, and the City of Los Angeles Fire Department.

The development of the Proposed Project would not 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; nor would it 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 would occur, and no further analysis of this issue is required in the EIR.

²⁶ City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, Exhibit A: Mineral Resources, September 26, 2001.

²⁷ Division of Oil, Gas, & Geothermal Resources (DOGGR), Well Finder, website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed January 2019. (API: 0403715230, Well Number:102, and API: 0403715229 Well Number:99)

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction of the Proposed Project would require the use of construction equipment during grading, hauling, establishing of building foundations, installation of utility lines and services, and other construction activities. Thus, the potential exists for construction noise to be generated in excess of the noise standards established by the City. The Proposed Project's construction noise would be compared to the ambient noise measurements recorded at the Project Site and compared to the noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) to determine whether the construction activities generate excess noise levels. Operational noise impacts would occur from the increase in mobile activity to and from the Project Site and from stationary point sources such as building mechanical equipment, loading areas, and outdoor open space areas. Operational noise levels would also be estimated and compared to the existing ambient noise levels to determine whether the Proposed Project adheres to the City's Noise Element and Noise Ordinance. Sensitive receptors identified in the area that may be impacted from construction and operational noise include the Hancock Park Elementary School and the multi-family residential buildings within 500 feet of the Project Site. Accordingly, this issue will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the United States is

referenced as vibration decibels (VdB). The City has not adopted regulations for construction groundborne vibration impacts. Consequently, for purposes of this analysis, the Caltrans' and the Federal Transit Administration's (FTA) adopted vibration standards for assessing potential building damage and annoyance, respectively, would be used to evaluate potential impacts related to project construction and operation.

Construction of the Project has the potential to generate groundborne vibration that could impact surrounding land uses. Groundborne vibration impacts on building structures resulting from heavy construction equipment used during earthwork and construction activities would be estimated by data published in the Caltrans Transportation and Construction Vibration Guidance Manual (2013). Potential vibration levels resulting from construction equipment would be calculated at nearby off-site buildings and structures that are sensitive to vibration based on soil type and distance attenuation. In terms of groundborne vibration impacts associated with human annoyance, the FTA's vibration impact thresholds for sensitive buildings, residences, and institutional land uses under conditions where there are a frequent number of events per day, would be applied to provide a conservative vibration analysis. Groundborne vibration levels for off-site activities (i.e., hauling) would also be estimated by data in the FTA's Noise and Vibration Impact Assessment and analyzed against the thresholds based on the sensitive receptor's land use.

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

Because the Proposed Project would involve heavy construction equipment and demolition activities that have the potential to generate groundborne vibration, the Proposed Project's potential to generate excessive vibration and groundborne noise and the potential impact on surrounding land uses during construction and operation will be further analyzed in the scope of the EIR.

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

No Impact. As discussed previously, the nearest airport is the Santa Monica Airport, which is located over six miles from the Project Site. Therefore, the Proposed project would not expose people residing or working in the project area to excessive noise levels associated with a public airport or public use airport. No impact would occur and no further analysis of this issue is required in the EIR.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The Proposed Project would develop 331 multi-family residential units. As noted above, the Proposed Project is consistent with the zoning and land use designations in adopted planning documents, such as the Wilshire Community Plan and applicable provisions of the LAMC. The Community Plan anticipates planned population growth and establishes housing and land use goals and policies accordingly. It follows that the Proposed Project would not induce substantial unplanned population growth in the Wilshire Community Plan area even though it would result in new multi-family units on the Project Site. Impacts would likely be less than significant. Also, the Proposed Project does not include the extension of new roads or propose new infrastructure that could indirectly induce population growth. However, to provide comprehensive population and housing analysis, whether the Proposed Project would induce substantial unplanned population growth will be further analyzed in the scope of the EIR.

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

No Impact. The Proposed Project would develop a mixed-use residential and commercial building on a site that is currently occupied by five commercial/retail buildings and paved surface parking. There are no housing units on the Project Site. As such, the Proposed Project would not displace any existing housing or people. Therefore, the Proposed Project would not displace substantial numbers of existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impact would occur and no further analysis of this issue is required in the EIR.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☒	☐	☐	☐
d. Parks?	☒	☐	☐	☐
e. Other public facilities?	☒	☐	☐	☐

a. Fire protection?

Potentially Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The Project Site is served by LAFD Station No. 61, located at 5821 West 3rd Street, which is located approximately 0.8 miles east of the Project Site. The Proposed Project would construct a mixed-use residential and commercial building with a maximum of 331 residential dwelling units and approximately 83,994 square feet of new commercial/retail space. Thus, the Proposed Project could potentially increase the demand for LAFD services. At this time, it is undetermined whether the Proposed Project would increase demand to the extent that a new facility would need to be constructed to maintain acceptable service ratios. Therefore, the potential impact of the Proposed Project on fire protection services will be further analyzed in the scope of the EIR.

b. Police protection?

Potentially Significant Impact. Police protection services for the Project Site are provided by the City of Los Angeles Police Department (LAPD). The Project Site is located in the LAPD's West Bureau and is served by the Wilshire Community Police Station, located at 4861 West Venice Boulevard, approximately three miles southeast of the Project Site. Within the Wilshire Area, the Proposed Project is located within Reporting District (RD) 734. The Proposed Project would include the new construction of an eight-story, mixed-use residential and commercial building with a maximum of 331 residential dwelling units and approximately 83,994 square feet of new commercial/retail space. Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Additionally, the development of the Proposed Project could result in an increase of on-site residents, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. At this time, it is undetermined whether the Proposed Project would increase demand to the extent that a new

facility would need to be constructed to maintain service ratios. Therefore, the potential impact of the Proposed Project on police protection services will be analyzed in the scope of the EIR.

c. Schools?

Potentially Significant Impact. The Project Site is located in LAUSD Board Districts 1 and 4. The Project Site is currently served by three schools including: Hancock Park Elementary School, which serves grades K-5; John Burroughs Middle School, which serves grades 6-8; and Fairfax Senior High School, which serves grades 9-12. The Proposed Project includes the construction of a mixed-use development with 331 multi-family residences and approximately 83,994 square feet of new commercial/retail space. Thus, the Proposed Project could increase the residential population in the vicinity of the existing local schools.

As part of its impact analysis, the EIR would analyze anticipated student generation associated with the Project. Particularly, the number of students generated from the Proposed Project would be estimated using the student generation rates provided in the LAUSD 2018 Developer Fee Justification Study (March 2018). Pursuant to SB 50, the Applicant would be required to pay development impact fees related to schools before issuance of a building permit. Pursuant to Government Code Section 65995, the mandatory payment of development impact fees to the LAUSD is deemed to provide full and complete mitigation of potential impacts on school facilities. However, considering the proximity of Hancock Park Elementary School to the Project Site, whether the Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts will be further analyzed in the scope of the EIR.

d. Parks?

Potentially Significant Impact. Preliminary research indicates that there are a total of nine parks that equate to over 64 acres of parkland and public recreation facilities within a two-mile radius of the Project Site. The Project would result in an increase of approximately 804 new residents to the area, which would create an additional demand on the parks and recreation facilities. Based on the City's standard parkland ratio goal of four acres per 1,000 residents, the Proposed Project would generate a need for approximately 3.26 acres of public parkland. This need could be met through a combination of on-site open space and amenity areas and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity. Since the Proposed Project would increase the demand for local parks, the potential impact of the Proposed Project on park and recreation facilities will be further analyzed in the scope of the EIR.

e. Other public facilities?

Potentially Significant Impact. The Los Angeles Public Library (LAPL) branch currently serving the Project Site includes the Fairfax Branch Library, located at 161 South Gardner Street (approximately 0.6 miles east of the Project Site). The Proposed Project's impacts upon library services are determined based on the population of the service areas for the existing libraries serving the Project area and the ability of the libraries serving the Project area to continue to serve the Project area population based on the anticipated number of library patrons and residents that the Proposed Project is anticipated to generate upon buildout. Since the Proposed Project would increase the demand on local public libraries compared to existing conditions, the potential impact of the Proposed Project on library services will be further analyzed in the scope of the EIR.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

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

Potentially Significant Impact. The Proposed Project would result in an increase of approximately 804 new residents to the area²⁸, and potentially increase the use of existing parks and recreation facilities. Based on the City's standard parkland ratio goal of 4 acres per 1,000 residents, the Proposed Project would generate a need for approximately 3.26 acres of public parkland. This need could be met through a combination of on-site open space and amenity areas and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity.

Overall, the Proposed Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. Furthermore, the Proposed Project's payment of applicable Quimby fees (LAMC Section 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) would be utilized to offset potential impacts on park and recreational facilities. Nonetheless, because the Proposed Project could increase the utilization existing parks and facilities compared to existing conditions, this issue will be further analyzed in the scope of the EIR.

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?

Potentially Significant Impact. The Proposed Project would include private recreational facilities for the use of Project residents and guests. Pursuant to the LAMC 12.21 G, the Proposed Project would be required to provide 37,225 square feet of open space on site. Consistent with this requirement, the Project Site would provide 37,225 square feet of open space. Common open space would include outdoor courtyards, roof deck, pool deck, and amenity rooms. As mentioned

²⁸ Per email correspondence from Jack Tsao, Department of City Planning Demographics Unit, to Kathleen King, City Planner, the citywide average person per household for multiple dwelling housing units is 2.43 based on the 2016 5-year average estimate (2012-2016) provided by the U.S. Census Bureau's American Community Survey.

above in Threshold IX.(a), the Proposed Project's payment of applicable Quimby fees (LAMC Section 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) would also be utilized for park and recreational facility acquisition, expansion, and improvement. However, due to the Proposed Project's increased demand upon recreational facilities, the Proposed Project's compliance with the parkland provisions of the LAMC and potential impacts on neighborhood and regional parks and other recreational facilities will be further analyzed in the scope of the EIR.

XVII. TRANSPORTATION²⁹

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☒	☐	☐	☐

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

Potentially Significant Impact. The Proposed Project would include the development of a mixed-use development that would add 331 residential units and approximately 83,994 square feet of new commercial/retail space. Development of the Proposed Project would have the potential to increase vehicle trips to and from the Project Site, increase pedestrian activity on the Project Site and in the area, and increase demand for mass transit within the Project area. The Proposed Project would also have the potential to impact the circulation system and area roadways. LADOT has established criteria to determine if Project impacts are significant at an intersection. The number of increased trips to the surrounding traffic circulation would be estimated and analyzed to determine if the Level of Significance and volume-to-capacity ratios

²⁹ Until the City has adopted new Transportation thresholds (or July 1, 2020, whichever is sooner), this section will use the 2018 Appendix G questions. Once new thresholds have been adopted, the Initial Study will be updated to reflect the 2019 Appendix G.

for each study intersection is exceeded. Therefore, whether the Proposed Project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities will be further analyzed in the scope of the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ³⁰

Potentially Significant Impact. To address the increasing public concern that traffic congestion is affecting the quality of life and economic vitality of the State of California, Proposition 111 enacted the Congestion Management Program (CMP). The Los Angeles County CMP requires that new development projects analyze potential project impacts on CMP monitoring locations, if an EIR is prepared for the project. When a CMP analysis is needed, the CMP methodology requires that the Traffic Study analyze traffic conditions at all CMP arterial monitoring intersections where the project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. The CMP also requires that traffic studies analyze mainline freeway monitoring stations where the project will add 150 or more trips in either direction during either AM or PM weekday peak hours. The Proposed Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to the Project Site and in the vicinity. Therefore, potential impacts of the Proposed Project's additional traffic on CMP intersections and freeway segments will be further analyzed evaluated in the scope of the EIR.

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

No Impact. Vehicular access to the Project Site is currently provided from South Fairfax Avenue, West 3rd Street, and South Ogden Drive. Access to the parking garage would be provided from two driveways on the west side of Ogden Drive and from the surface parking areas on the western portion of the Project Site. Access to the surface parking areas would be provided from one driveway each along Fairfax Avenue and 3rd Street. The surface parking would also provide entrance into the parking garage of the mixed-use building. The alleyway would provide a one-way service driveway for loading purposes.

The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain any sharp curves or dangerous design features. Development of the Proposed Project would not result in any roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable emergency access requirements as set forth by the Department of Transportation (LADOT) and the LAFD. The Project design would also be reviewed by the Department of City Planning, LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, there will be no impacts associated with hazardous design features or incompatible uses and no further analysis of this issue is required in the EIR.

³⁰ While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

d. Result in inadequate emergency access?

Potentially Significant Impact. The Proposed Project may affect vehicular and pedestrian flow in the Project Site area during the construction phase, which would be temporary and only occur during the construction period. While it is expected that the majority of construction activities for the Proposed Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain activities such as utility connections or materials delivery, which could potentially require temporary lane closures. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans, or emergency access to the Project Site or adjacent uses.

Furthermore, the Project contractor will be required to prepare and implement a Construction Traffic Control/Management Plan to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project Site. With respect to operation, the Proposed Project would include an emergency lane through the Project Site to meet the requirements of the LAFD. There are no hazardous design features included in the proposed vehicular design or site plan for the Proposed Project that could impede emergency access. The Proposed Project would also be subject to the site plan review requirements of the LAFD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. However, due to the Proposed Project's potential to result in temporary lane closures during construction and realign driveway curbcuts along South Ogden Drive and West 3rd Street, potential impacts on emergency access during the Proposed Project's construction and operation will be further analyzed in the scope of the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, 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 or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. 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.

The Project Site is located in a highly urbanized area of the Wilshire Community Plan area in the City of Los Angeles, and has been partially disturbed by past development activities. The Proposed Project would involve the excavation and export of on-site soils for the development of two levels of subterranean parking. The potential exists for the discovery of tribal cultural resources. Therefore, whether the Proposed Project would cause a substantial adverse change

in the significance of a tribal cultural resource will be further analyzed in the scope of the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. The Proposed Project includes the partial demolition of the existing commercial buildings and surface parking lot, and the construction of a new mixed-use building containing 331 multi-family residential apartment dwelling units and up to approximately 83,994 square feet of new commercial floor area. To facilitate new construction, existing connections to water, wastewater, storm drains, electric power, natural gas, and telecommunication systems will need to be temporarily disconnected and reconnected to serve the new uses. Accordingly, construction impacts associated with localized infrastructure connections will be addressed within the scope of the EIR.

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

Potentially Significant Impact. The Proposed Project would result in the development of 331 new multi-family residential units and 83,994 square feet of additional commercial floor area. As such, the Proposed Project would have the potential to generate additional water demands upon the City's potable water source. The Proposed Project's water demand would be estimated utilizing the wastewater generation rates provided by the City's L.A. Sanitation, Wastewater Engineering Services Division. At a regional level, the estimated water demand from the Proposed Project would be compared to the growth projections discussed in the 2015 UWMP to determine if regional water supplies are adequate. Therefore, the potential impacts associated with the availability of water supplies to serve the Proposed Project will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. The Project Site wastewater generation is serviced by the HWRP. The Proposed Project's wastewater generation would be estimated utilizing the wastewater generation rates provided by the City's L.A. Sanitation, Wastewater Engineering Services Division. Wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the Hyperion Wastewater Reclamation Plan (HWRP), which has an available treatment capacity of approximately 175 mgd.³¹ The estimated wastewater generation would be compared to the daily maximum wastewater treatment capacity at the HWRP to assess whether the local treatment plant has adequate capacity to serve the Proposed Project. The potential impacts associated with the provision of wastewater treatment services to the Proposed Project will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. The Sunshine Canyon Landfill and Chiquita Canyon Landfill are the likely disposal sites for the Proposed Project. The Proposed Project's solid waste generation would be estimated utilizing the applicable solid waste generation rates. The estimated solid waste generation would be compared to the landfill capacity at the Sunshine Canyon Landfill and Chiquita Canyon Landfill to assess whether the local landfills have adequate capacity for the Proposed Project in order to determine whether the Proposed Project would have impacts to the local landfill capacities. Whether there are any potential impacts associated with the ability of the local landfills to serve the Proposed Project will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. The Proposed Project would be required to comply with federal, state, and local statutes and regulations related to solid waste that are applicable to the Proposed Project. Such regulations include AB 939 – California Integrated Waste Management Act of 1989, California Green Building Code, the Los Angeles County Integrated Waste Management Plan,

³¹ City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: www.lacitysan.org, accessed December 2018.

the City of Los Angeles Solid Waste Integrated Resources Plan, and the LAMC. The Proposed Project's potential impacts associated with federal, State, and local management reduction statutes and regulations related to solid waste will be analyzed in the EIR.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Responses a through d: No Impact. The Project Site is located in an urbanized area with no natural vegetation. The Project Site is improved with commercial structures and parking lots.

There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site³² Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

Potentially Significant Impact. As discussed above, the Proposed Project is located in a highly urbanized area and would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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. However, based on the analysis contained in this Initial Study, the Proposed Project has the potential to result in significant impacts with regard to the following subject areas: air quality; greenhouse gas emissions; noise; population/housing;

³² City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed January 2019.

public services; recreation; transportation; tribal cultural resources; and utilities/service systems. Therefore, the potential for the Proposed Project to substantially degrade the quality of the environment will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of a project are individually limited, but could be cumulatively considerable, when combined with impacts from other developments. Cumulative impacts can be analyzed by reviewing a list of related projects, analyzing adopted plans that contain growth and development projections, or a combination of both methods. As discussed above, the Proposed Project is consistent with adopted land use plans and zoning. The Project Site is located in an area where there are other past, current, and reasonably foreseeable development projects. Those projects, in conjunction with the Proposed Project, could create cumulatively considerable impacts. Therefore, impacts of the Proposed Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; population/housing; public services; recreation; transportation/traffic; tribal cultural resources; and utilities/service systems. Cumulative impacts for each environmental issue topic included will be further analyzed in the scope of the EIR.

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

Potentially Significant Impact. As identified in this Initial Study, the Proposed Project has the potential to result in significant impacts. Impacts for each potentially significant impact category identified in items I through XVIII, above, will be analyzed in the scope of the EIR.