

656 South San Vicente Medical Office Project

Case Number: ENV-2017-468-EIR

Project Location: 650 – 676 South San Vicente Boulevard, Los Angeles, California 90048

Community Plan Area: Wilshire

Council District: 5 – Paul Koretz

Project Description: The 656 South San Vicente Medical Office Project (Project) would demolish a 5,738 square-foot, vacant educational building, an 8,225 square-foot commercial building, and associated surface parking in order to develop a medical office and retail-commercial development on an approximately 0.76-acre (33,087 gross square feet) site located at 650-676 South San Vicente Boulevard (Project Site). The Project would include up to 145,305 square feet of floor area, for a 4.5:1 floor area ratio (FAR), that would include 140,305 square feet of medical office space and 5,000 square feet of ground floor retail-commercial space. The proposed building would be 12 stories and approximately 218 feet in height (230 feet to the top of the mechanical penthouse). The Project would provide 418 parking spaces within four screened, above-ground levels, including 393 vehicle parking spaces for medical office and 25 vehicle parking spaces for retail-commercial uses. The Project would also include 716 bicycle parking spaces.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Environmental Science Associates (ESA)

APPLICANT:

656–676 SSV Property Owner, LLC and 650 SSV Property Owner, LLC

January 2020

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

An application for the proposed 656 South San Vicente Medical Office Project (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 project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study evaluates potential environmental effects resulting from construction, implementation, and operation of the Project. The 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). The City uses Appendix G of the State *CEQA Guidelines* as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are informational documents and are ultimately required to be adopted by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF INITIAL STUDY

CEQA 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 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 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 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 Project.

1.3 CEQA PROCESS

In compliance with the State *CEQA Guidelines*, the City, as the Lead Agency for the 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 Project may have a significant effect on the environment. This Initial Study determined that the 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 a 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.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	656 SOUTH SAN VICENTE MEDICAL OFFICE PROJECT
ENVIRONMENTAL CASE NO.	ENV-2017-468-EIR
RELATED CASES	CPC-2017-467-GPA-VZC-HD-SPR

PROJECT LOCATION	650 - 676 SOUTH SAN VICENTE BOULEVARD, LOS ANGELES, CA 90048
COMMUNITY PLAN AREA	WILSHIRE
GENERAL PLAN DESIGNATION	LIMITED COMMERCIAL
ZONING	C1-1VL-O
COUNCIL DISTRICT	5 – PAUL KORETZ

LEAD CITY AGENCY	City of Los Angeles
STAFF CONTACT	PAUL CAPORASO
ADDRESS	221 NORTH FIGUEROA STREET, SUITE 1350 LOS ANGELES, CA 90012
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APPLICANT	656–676 SSV PROPERTY OWNER, LLC and 650 SSV PROPERTY OWNER, LLC
ADDRESS	10850 WILSHIRE BOULEVARD, SUITE 1050 LOS ANGELES, CA 90024
PHONE NUMBER	(310) 693-4400

Environmental Factors Potentially Affected

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions 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.

Paul Caporaso, Planning Assistant
PRINTED NAME, TITLE

January 14, 2020
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

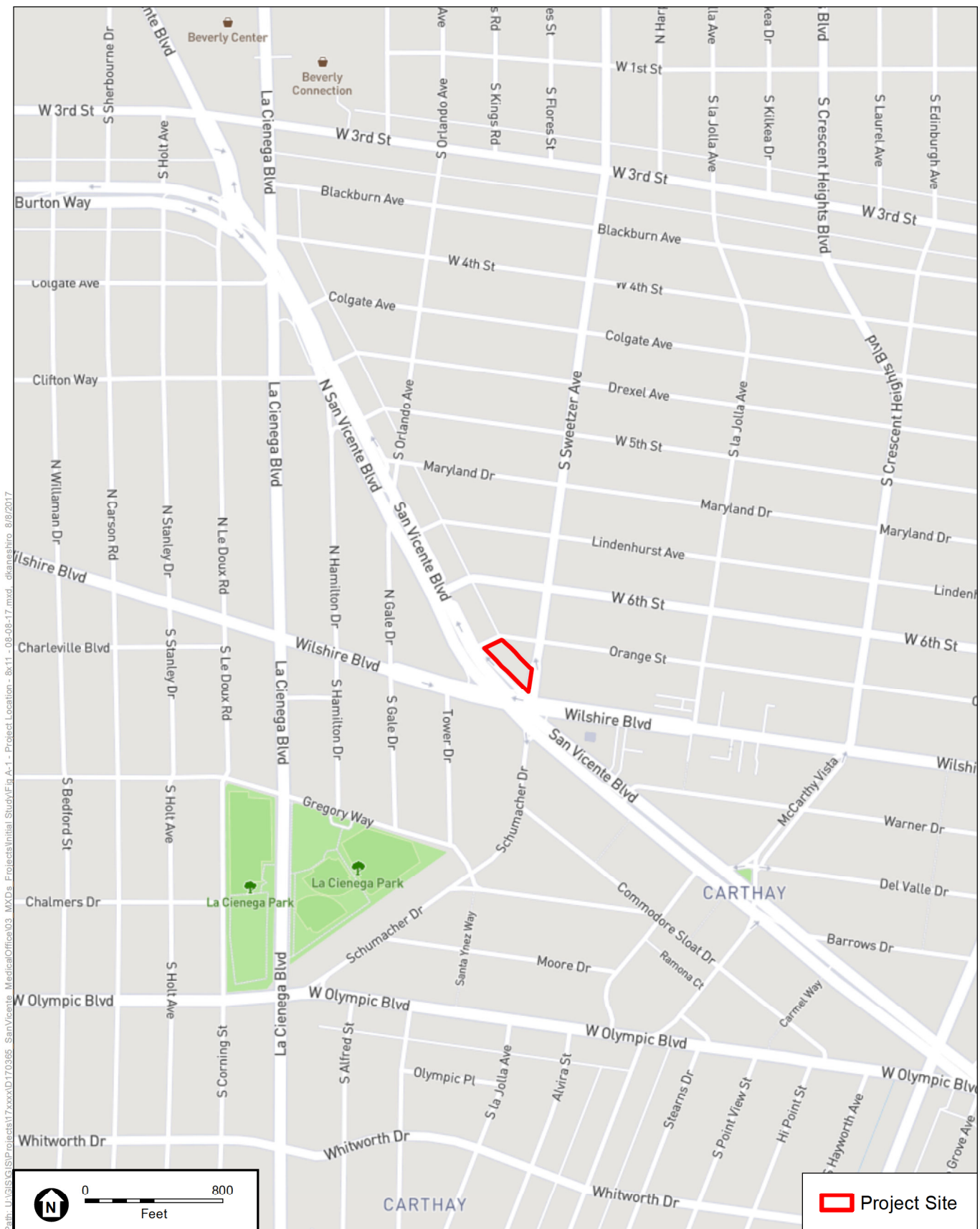
The 656 San Vicente Medical Office Project (Project) would demolish a 5,738 square-foot, vacant educational building, an 8,225 square-foot Big 5 Sporting Goods store, and associated surface parking to develop a medical office and retail-commercial development on an approximately 0.76-acre (33,087 square feet, 32,290 net square feet) site located at 656 South San Vicente Boulevard (Project Site). The Project Site is located at the corner of Wilshire Boulevard and San Vicente, in an urbanized area adjacent to commercial, office, residential, and medical related uses.

The Project would include up to 145,305 square feet of floor area, comprised of 140,305 square feet of medical office space and 5,000 square feet of ground floor retail-commercial space, of which up to 4,000 square feet may be a restaurant and 1,000 square feet may be other commercial uses, such as a pharmacy. The proposed building includes 12 stories and measures approximately 218 feet in height (230 feet to the top of the mechanical penthouse). The Project would include seven floors of medical office uses over four floors of above-grade parking, and a ground floor containing a lobby for the medical office and other commercial uses. The Project would provide full-valet services for 418 parking spaces, including 393 vehicle parking spaces for medical office and 25 vehicle parking spaces for retail-commercial uses. The Project would also provide full-valet service for bicycle parking and would include 716 bicycle parking spaces for short- and long-term use.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is bounded by South San Vicente Boulevard to the west, Wilshire Boulevard to the south, Sweetzer Avenue to the east, and Orange Street to the north, within the Wilshire Community Plan area in the City of Los Angeles (City). A small alley abuts the Project Site to the northeast. The Project Site is approximately 0.9 miles south of the City of West Hollywood, and less than 200 feet (approximately 0.035 miles) east of the City of Beverly Hills, located on the eastern side of South San Vicente Boulevard. As shown on **Figure 1, Project Location**, the Project Site is served by a network of regional transportation facilities that provide access to the greater metropolitan area. Regional access to the Project Site is provided by the Santa Monica Freeway (I-10), which runs east-west approximately two miles to the south of the Project Site, the Hollywood Freeway (US-101), which runs north-south approximately four miles east of the Project Site and the San Diego Freeway (I-405), which runs north-south approximately four miles west of the Project Site.



SOURCE: Open Streetmap, 2016.

656 San Vicente Project

Figure 1
Project Location



SOURCE: Google Earth, 2016 (Aerial).

656 San Vicente Project

Figure 2
Aerial View of Project Site and Surrounding Uses

The Project Site is currently served by five Metro bus lines (30/330, 20, 720, 728 and 705), and within 1,500 feet of the Wilshire/La Cienega Metro Purple Line Station, which is currently under construction and is anticipated to be operational in 2023.² Specifically, the Project Site will be served by two planned Metro Purple Line stations, one at the corner of Wilshire Boulevard and La Cienega Boulevard, 0.25 miles to the west of the Project Site, and another at the corner of Wilshire Boulevard and Fairfax Avenue, less than one mile to the east of the Project Site.

3.2.2 Existing Conditions

The Project Site is presently developed with a 5,738 square-foot educational building (which is now vacant)³ that previously housed the Montessori Children's World School and an 8,225 square-foot Big 5 Sporting Goods store. Surface parking associated with these uses is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north. Additional surface parking is located in the middle of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store. All parking areas are accessible from South San Vicente Boulevard and the alley.

As previously discussed, one Metro Purple Line station is planned at the corner of Wilshire Boulevard and La Cienega Boulevard and would be located 0.25 miles to the west of the Project Site. The Metro Purple Line service at this station is anticipated to be operational in 2023,⁴ which is within the planning horizon year of Section 450.216 of Title 23 of the Code of Federal Regulations (which, as of 2016 has a long range statewide plan with a minimum 20-year horizon).⁵

3.2.3 Existing Planning and Zoning

The Project Site, which is within the planning boundary of the Wilshire Community Plan area, has a General Plan land use designation of Limited Commercial and is zoned C1-1VL-O. This zoning permits commercial and retail uses. The Project Site is also located within a Transit Priority Area (TPA), which is defined by Public Resources Code (PRC) Section 21099 as an area within 0.5 miles 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. The City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 (Transit Priority Areas [TPAs] / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA) was developed in response to Senate Bill (SB) 743 which, pursuant to Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if: (1) the project is a residential, mixed-use residential, or employment center project, and (2) the project is located on an infill site within a transit priority area. PRC Section 21099 defines the criteria for an employment center, infill site, and TPAs. Specifically, "infill site" is defined as a location within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site

² Metro, Metro Purple Line Extension FAQs, <https://www.metro.net/projects/westside/>. Accessed December 4, 2017.

³ The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

⁴ Metro, Metro Purple Line Extension FAQs, <https://www.metro.net/projects/westside/>. Accessed December 4, 2017.

⁵ Federal Register, Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning. Available at: <https://www.federalregister.gov/documents/2016/05/27/2016-11964/statewide-and-nonmetropolitan-transportation-planning-metropolitan-transportation-planning>. Accessed June 13, 2019.

adjoins an improved public right-of-way. “TPAs” are defined as areas within 0.5 miles of a major transit stop that is existing or planned. A “major transit stop” is defined as a site containing an existing rail transit station 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. Under ZI File No. 2452, a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 miles from the major transit stop. The “Citywide Transit Priority Areas” map contained in ZI File No. 2452 illustrates overlapping TPAs within Downtown Los Angeles.

As discussed above, the Project is an employment center comprised of a mix of uses including office and retail-commercial uses on a previously developed “infill” site located within 0.25 miles of a planned Metro Purple Line station to the west of the Project Site. As such, the Project meets the criteria of SB 743 and ZI File No. 2542. As discussed in ZI File No. 2542, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas, and any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact, unless evaluation is required under other land use regulations of the LAMC.

3.2.4 Surrounding Land Uses

As shown in **Figure 2, Aerial View of the Project Site and Surrounding Uses**, the Project Site is in a highly urbanized area, bordered by mid-and high-rise commercial, office, and medical-related uses along South San Vicente Boulevard and Wilshire Boulevard to the west and south. Directly northwest of the Project Site along South San Vicente Boulevard, is a five-story office building with existing rooftop billboards, and an associated four-story parking structure. Further north is a three-story rehabilitation center. Directly across from the Project Site in the City of Beverly Hills is a 10-story office building with ground floor commercial uses. North of the 10-story office building, is a three-story office/retail building and two apartment complexes, two- and three-stories in height. To the south, across from the intersection of South San Vicente Boulevard and Wilshire Boulevard, is a low-rise commercial center and associated surface parking. To the southeast, fronting Wilshire Boulevard is a 22-story medical office building owned by Cedars-Sinai Medical Center, which includes a rooftop heliport. Directly east of the Project Site, across from South Sweetzer Avenue, is a two-story brick building used as office space. West of the building, is a 12-story office building used by the Jewish Federation Goldsmith Center and the five-story Los Angeles Obchestvo Remeslenogo Truda (ORT) College.

Directly northeast of the Project Site across the alley are two, two-story apartment buildings. Further to the north and east, along Orange Street and South Sweetzer Avenue, are low-rise multi-family and single-family residential uses, located within the 6th Street-Orange Street Multi-Family Residential Historic District. Low-rise single-family and multi-family residential uses are also located to the south, across from Wilshire Boulevard. Cedars-Sinai Medical Center and Beverly Center are located less than one mile to the northwest; and the Los Angeles County Museum of Art campus (LACMA) and La Brea Tar Pits are located 0.75 miles to the southeast.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project would replace the existing uses on the Project Site with a 12-story medical office/retail-commercial building with up to 145,305 square feet of floor area, resulting in a 4.5:1 FAR, including up to 140,305 square feet of medical office uses and 5,000 square feet of ground floor retail-commercial uses. The proposed building would be approximately 218 feet in height (230 feet to the top of the mechanical penthouse), and seven floors of medical office uses over four levels of above-grade parking, and a ground floor containing a lobby for the medical office and other retail-commercial uses. The Project would provide 418 parking spaces, including 393 vehicle parking spaces for medical office and 25 vehicle parking spaces for retail-commercial uses. The parking garage would serve as a full-valet garage. The Project would also include 716 bicycle parking spaces for short- and long-term use. The proposed uses are summarized in **Table 1, Project Summary**.

Each of the Project components is discussed in further detail below:

3.3.2 Ground Floor Uses (Floor 1)

The Project's ground level (Floor 1) would contain 5,000 square feet of retail-commercial uses demised into two separate retail-commercial spaces. The larger retail-commercial space, of which up to 4,000 square feet may be used for restaurant uses with up to 815 square feet of associated outdoor dining, would front the corners of Sweetzer Avenue, Wilshire Boulevard, and South San Vicente Boulevard. The second retail-commercial space would front South San Vicente Boulevard, on the northern portion of the Project Site.

Located between the two retail-commercial spaces is a 1,860 square-foot lobby area, providing access from South San Vicente Boulevard to elevators and stairs for the Project's medical office areas. In addition, a loading dock, generator, compactors, biohazardous storage area, and receiving storage area would be located on the western portion of the Project Site.

A visitor drop-off and valet area would be accessible from the visitor entrance off of South San Vicente Boulevard to accommodate a parking queue and ride-share drop off area.

3.3.3 Parking (Floors 2 through 5)

The Project would provide 418 parking spaces within four, screened above-ground levels (Floors 2 through 5). The parking spaces would be designed to blend with the building's architecture to minimize views of the Project's parking uses from the street front. Further discussion is provided in Section 3.3.5, Access, Circulation, and Parking, below.

3.3.4 Medical Office Uses (Floors 6 through 12)

Floors 6 through 12 would include medical office spaces totaling up to 140,305 square feet of floor area. Floors 6 through 10 would also include small terraced landscaped areas overlooking South San Vicente Boulevard. In particular, Floor 6 would include 1,864 square feet of landscaped areas, Floor 7 would include 328 square feet of landscaped areas, Floor 8 would include 570 square feet of landscaped floor area, Floor 9 would include 533 square feet of landscaped floor

area, and Floor 10 would include 533 square feet of landscaped floor area. Mechanical equipment would be located on the roof.

Table 1
Project Summary

Uses	Total
Site Area	32,290 sf
Existing	
Vacant Building ^a	5,738 sf
Big 5 Sporting Goods Store	8,225 sf
Proposed	
Medical Office	140,305 sf
Retail-Commercial ^b	5,000 sf (up to 4,000 sf restaurant uses and 1,000 sf of retail uses)
Total Floor Area	145,305 sf
Proposed FAR	4.5:1
Outdoor Open Space	
Ground Floor	815 sf
Floor 6	1,864 sf
Floor 7	328 sf
Floor 8	570 sf
Floor 9	533 sf
Floor 10	533 sf
Parking	
Vehicle	418 (393 spaces for medical office, and 25 spaces for retail-commercial uses)
Bicycle	716

sf = square feet

^a The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

^b Up to 4,000 sf of this space may be developed as a small restaurant, with the remaining 1,000 sf developed as retail.

SOURCE: ZGF, 2019.

3.3.5 Access, Circulation, and Parking

Vehicle access to the parking levels (Floors 2 through 5) would be provided from Orange Street. A visitor drop-off and valet area would be accessible from the South San Vicente Boulevard entrance to accommodate a parking queue and ride-share drop-off area. A loading dock serving the office and retail-commercial uses would be located and accessed from Orange Street. No vehicular access would be provided through the alley.

Pedestrian access to the retail-commercial uses would be from the Sweetzer Avenue and South San Vicente Boulevard street frontages. Access to the office uses would be from the ground level lobby for the office building along South San Vicente Boulevard and from the parking levels via internal stairs and elevators.

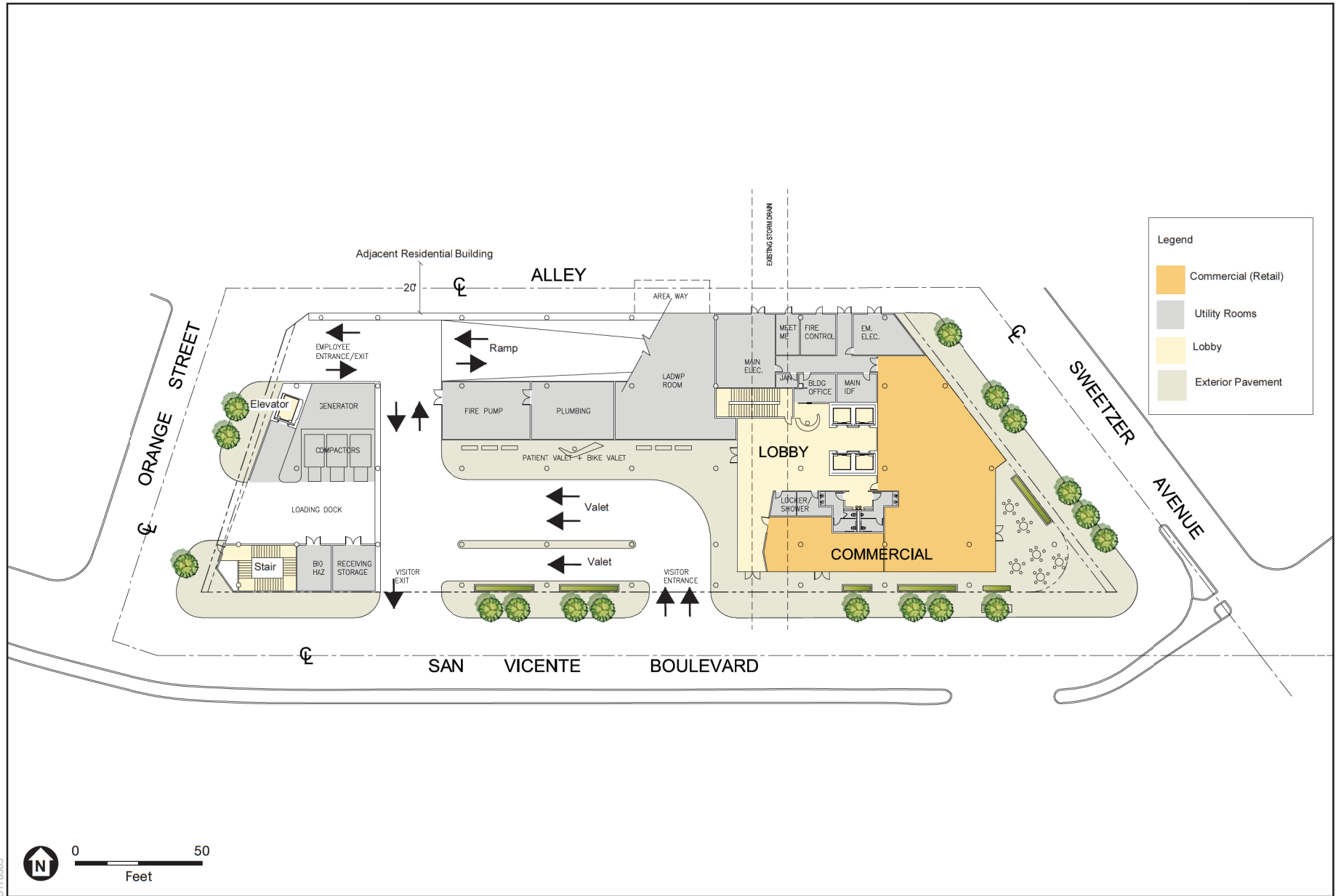
The Project would provide 418 vehicle parking spaces within four above-ground levels (Floors 2 through 5), including 393 vehicle parking spaces for medical office and 25 vehicle parking spaces for ground level retail-commercial uses. Parking spaces on each level would be provided in a combination of single, Americans with Disabilities Act (ADA), and stacked parking spaces, which would require 20-foot ceiling heights for Floors 2 through 5. Pursuant to LAMC Section 12.21 A.4(c), the combination of medical office and retail-restaurant uses would require a total of 746 vehicle parking spaces. Pursuant to LAMC Section 12.32 P, the Project is requesting a reduction in parking not to exceed 20 percent, incident to a legislative action, reducing the required vehicle parking to a total of 597 spaces. As required by LAMC Section 12.21A.16, the project would be required to provide 15 bicycle parking spaces. However, pursuant to LAMC Section 12.21 A.4(c), non-residential projects within a TPA may replace up to 30 percent of the required automobile parking spaces, or a reduction of 179 vehicle parking spaces, with bicycle parking at a rate of four bicycle parking spaces per vehicle parking space, thereby, further reducing the required vehicle parking spaces by 179 spaces. As such, the Project would provide a total of 716 bicycle parking spaces and 418 vehicle parking spaces.

As required by City Planning Commission EV Parking Policy and LAMC Section 99.04.106, Division 4, Article 9, Chapter IX (Ordinance No. 186485), the Project would provide 63 parking spaces that would be capable of supporting future electrical vehicle supply equipment (EVSE) and 21 parking spaces that would be equipped with electric vehicle (EV) charging stations.

Parking areas would be screened and designed to blend with the building's architecture to minimize views of the parking uses from the South San Vicente street frontage. The Project's Site Plan, Conceptual Diagrams, and Elevations are provided in **Figures 3 through 8**.

3.3.6 Design and Landscaping

The Project is designed as a modern building that would complement the surrounding contemporary high-rise commercial and office buildings extending along South Vicente Boulevard and Wilshire Boulevard. The building is designed with stepped terraces to break up the building's massing. The height of the proposed building would visually serve as a horizontal extension of the office buildings to the north. The floor-to-ceiling insulated clear glazing would bring light and views directly into the medical office spaces. The building is located on the corner of Wilshire Boulevard and Sweetzer Avenue, where larger buildings line the street. The building steps back toward the shorter office buildings on South San Vicente and towards the residential neighborhood to the north. **Figure 9, Landscape Plan** illustrates the proposed landscaping for the Project. The ground level streetscape includes landscaping and seating for the potential outdoor dining area that would be located on the corners of Sweetzer Avenue, Wilshire Boulevard, and South San Vicente Boulevard. The retail and restaurant space on the ground floor of the proposed building would be visible through clear windows and doors to create an inviting and accessible areas from the sidewalk. As previously discussed, the ground floor would include 815 square feet dedicated to outdoor seating for the potential café area. In addition, Floors 6 through 10 would include small terraced landscaped patios that would be provided overlooking South San Vicente Boulevard that would be exclusively used by the building tenants. In particular, Floor 6 would include 1,864 square feet of landscaped areas, Floor 7 would include 328 square feet of landscaped areas, Floor 8 would include 570 square feet of landscaped floor area, Floor 9 would include 533 square feet of landscaped floor area, and Floor 10 would include 533 square feet of landscaped floor area.



SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 3
Site Plan



D1770365

SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 4
Rendering Street Level towards Northwest

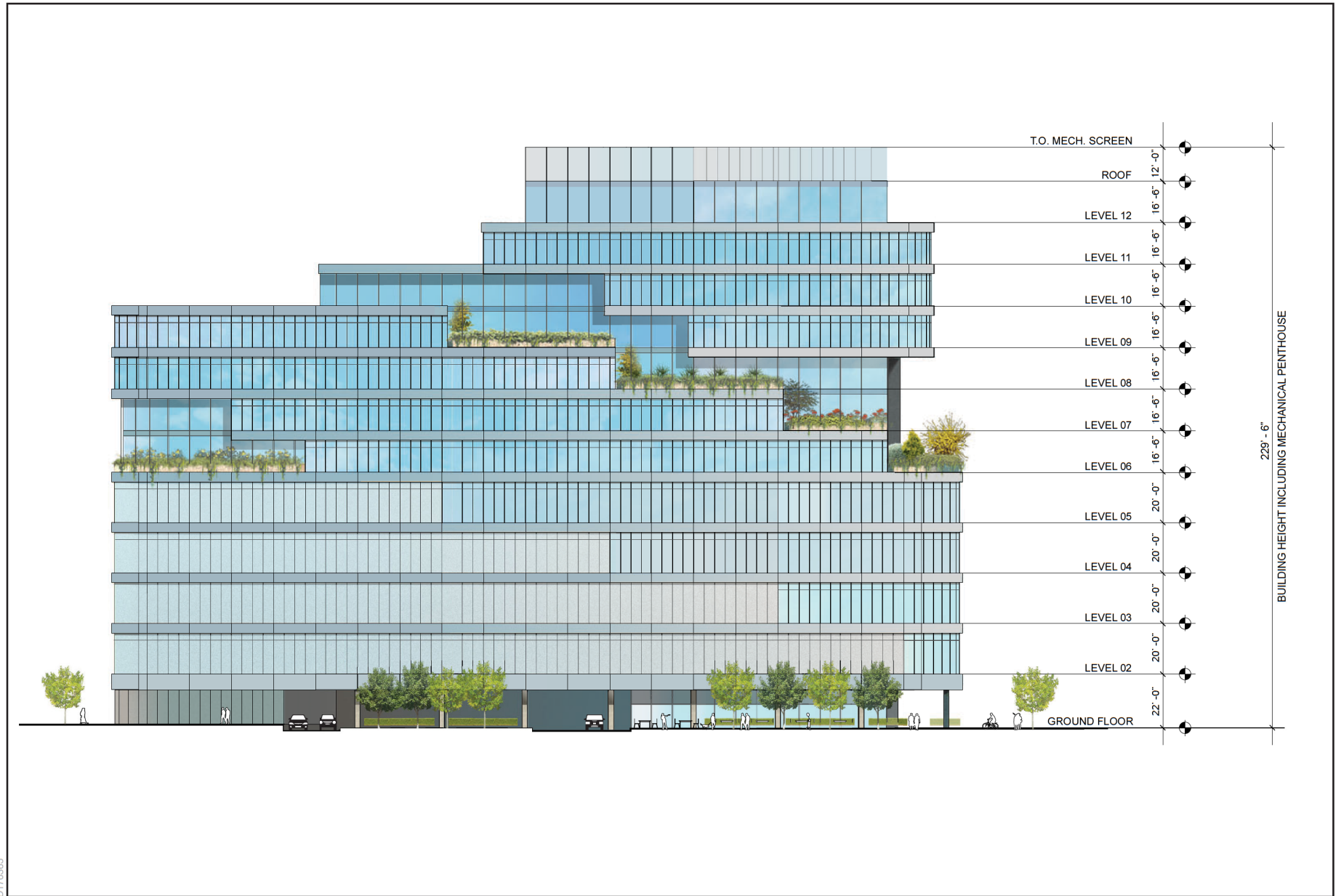


SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 5
Aerial Rendering towards Northwest at Dusk



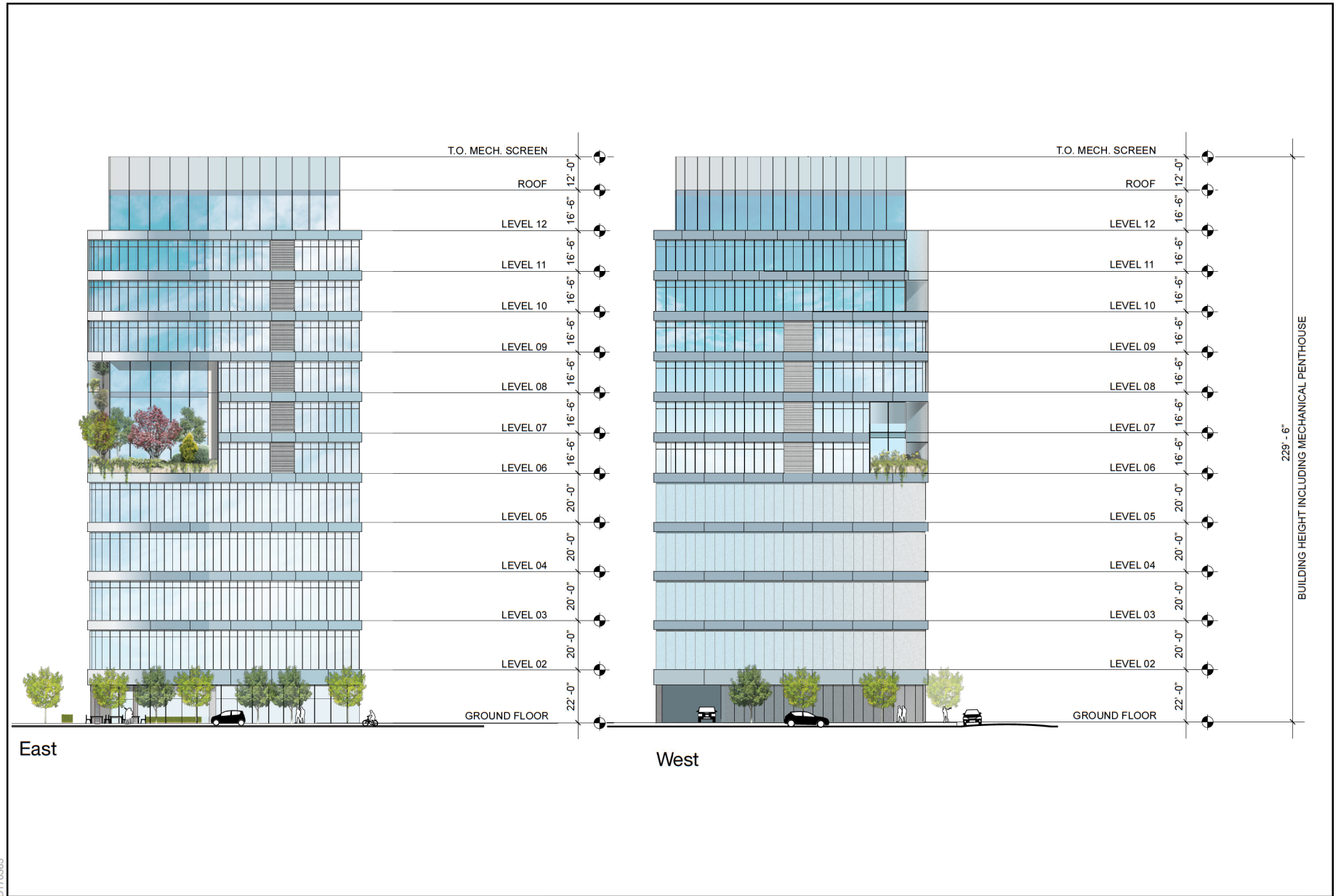


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SOURCE: ZGF Architects, 2019

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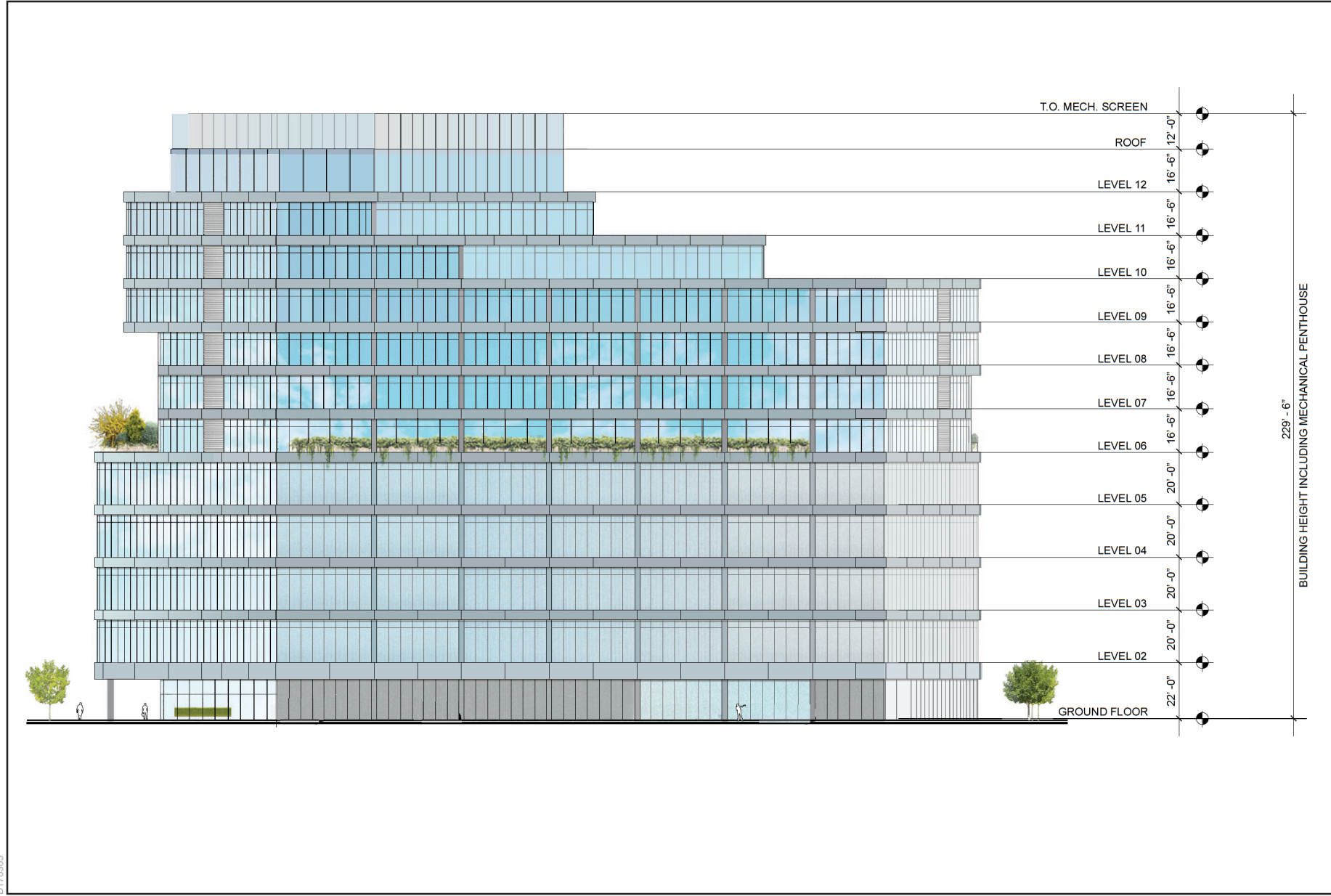
Figure 6
South Elevation



SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 7
West and East Elevation



SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 8
North Elevation



SOURCE: ZGF Architects, 2019

656 San Vicente Project

Figure 9
Landscape Plan

With regard to trees existing on the Project Site, the Project would replace all significant non-protected trees (8 inches or greater of cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) at 1:1 ratio with a minimum of 24-inch box tree. As discussed in the Tree Report, provided in Appendix A, of this Initial Study, all of the trees on the Project Site are significant, non-protected trees. As illustrated in Figure 9, the Project would provide 17 trees on the ground level, with additional trees provided in the small terraced landscaped patios on Floors 6 through 10.

3.3.7 Lighting and Signage

New lighting would include building identification, commercial accent lighting, wayfinding, balcony/garden lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security and ground-mounted. As required by LAMC Section 93.0117(b), exterior light sources and building materials would be designed such that they would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive residential land uses.

Building identification signage would be provided for the ground level retail and/or restaurant uses. The building would also include street address and identification/wayfinding signage for the vehicular and pedestrian entries to the building. In addition, the building would include directional signage, including the multi- and single-family neighborhood to the north, by focusing the pedestrian and guest vehicular access from South San Vicente Boulevard and Orange Street. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance with applicable LAMC requirements.

3.3.8 Site Security

The Project would incorporate security measures for the safety of employees and visitors to the Project Site. During construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Project Site security would include controlled keycard access to medical office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

3.3.9 Sustainability

Energy saving and sustainable design features would be incorporated into the Project. The proposed building would comply with the City of Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program to meet the standards of LEED Silver Certification or equivalent green building standards. Design features would include energy conservation, water conservation, waste reduction features, and pedestrian- and bicycle-friendly site design. In addition, the Project would include ENERGY STAR-rated appliances and install energy efficient boilers, heaters and air conditioning systems. All glass used in the building would have minimal reflectivity to reduce

glare to surrounding neighbors. The vehicle parking spaces proposed on the Project Site would be capable of supporting future EVSE, as well as equipped with EV charging stations, as described further above under Subsection 3.3.5, Access, Circulation, and Parking. The Project would also provide solar ready wiring on the highest roof level. The terraced landscaped areas on Floors 6 through 10 would serve as partial green roofs that would serve to help cool the building, and would include sustainable paving materials that would minimize heat.

3.3.10 Construction Schedule

Construction is anticipated to begin in 2021 with an estimated completion date in 2023.

Total cut would be approximately 9,000 cubic yards (cy), all of which would be exported off-site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. Parking for construction workers would be provided on the Project Site or leased from near-by off-site parking areas. Shuttle service would also be provided for those construction workers who park in off-site parking areas.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC § 11.57, a General Plan Amendment to re-designate the underlying land use from Limited Commercial to Regional Center Commercial;
- Pursuant to LAMC §§ 12.32 F, P and Q, a Vesting Zone Change and Height District Change from C1-1VL-O to (Q)C2-2D-O to allow for an FAR of 4.5:1 and reduced parking;
- Pursuant to LAMC § 16.05, Site Plan Review for a project resulting in greater than 50,000 square feet of nonresidential floor area;
- Pursuant to LAMC § 17.15, a Vesting Tentative Tract Map (VTTM 74865) for a merger of seven (7) lots and re-subdivision of a 0.76-acre site to create one (1) ground lot and one (1) airspace lot; and
- Other approvals as needed and as may be required such as construction permits, including demolition and building permits, grading, excavation, foundation, and associated permits; temporary street closure permits, grading permits, and sign permits.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

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 miles 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 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.”⁶

PRC Section 21099 applies to the 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) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

⁶ 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 13, 2019.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099 would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide and extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public. The Project Site is located within the highly urbanized Wilshire Community Plan area (or Mid-City section) of the City near the highly visible and active intersection of Wilshire Boulevard and South San Vicente Boulevard.

The only valued visual resource in the Project vicinity is the view towards the Hollywood Hills to the north. As shown in the existing site photographs provided in **Figures 10** through **Figure 13**, below, due to the highly urbanized surroundings, predominately flat terrain, and the dense intervening development, long range views of the Hollywood Hills are not available. Limited views of the Hollywood Hills looking northeast are available along South San Vicente Boulevard; however, these views are obstructed by existing development. Thus, the Project would not have a substantial adverse effect on a scenic vista.



SOURCE: Google Earth, 2016 (Aerial).

656 San Vicente Project

Figure 10
Existing Site View Location Map

View Location 1



View Location 2



SOURCE: ESA, 2019

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Figure 11
Existing Site View Locations 1 and 2

View Location 3



View Location 4



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SOURCE: ESA, 2019

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Figure 12
Existing Site View Locations 3 and 4

View Location 5



View Location 6



SOURCE: ESA, 2019

656 San Vicente Project

Figure 13
Existing Site View Locations 5 and 6

In any event, the Project cannot have a substantial adverse effect on a scenic vista pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no further evaluation of this topic is required in the EIR and no mitigation measures are 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 not located within a State-designated Scenic Highway or associated view corridor.⁷ The nearest eligible state scenic highway is along California State Route 1, approximately 7.25 miles west of the Project Site.⁸ As such, development of the Project would not substantially damage scenic resources as the Project Site is not within a State Scenic Highway.

In any event, the Project cannot have a substantial adverse effect on scenic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no further evaluation of this topic is required in the EIR and no mitigation measures are required.

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?

Less Than Significant Impact. The Project would replace the existing uses with a mixed-use development consisting of medical office and retail-commercial uses. The proposed structure would be approximately 218 feet in height (230 feet to the top of the mechanical penthouse), and is comprised of a 12-story building including a seven-stories of medical office uses above four above-ground parking levels, and a ground level containing retail-commercial uses and a lobby for the medical offices. The Project Site is within the highly urbanized Wilshire Community Plan (or Mid-City section) of the City and is bordered by existing mid-and high-rise commercial, office, and medical-related uses along South San Vicente Boulevard and Wilshire Boulevard to the west and south.

As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, the Project Site is zoned C1-1VL-O (Limited Commercial, Height District 1VL, Oil Drilling District). The C1 designation indicates that the Project is within a Limited Commercial Zone, which permits commercial and retail uses. The 1VL indicates that the Project Site is within Height District 1VL. Height District 1VL within the C1 zone restricts height to 45 feet. The O designation indicates that the Project Site is located within an oil drilling district where the drilling of oil wells or the production from wells of oil, gas, or other hydrocarbon substances is permitted.

⁷ State of California, Department of Transportation, Officially Designated State Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed December 5, 2019.

⁸ State of California, Department of Transportation, Officially Designated State Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed December 5, 2019.

As part of the requested permit and approvals, the Project would require a General Plan Amendment to re-designate the underlying land use from Limited Commercial to Regional Center Commercial (LAMC § 11.57) and a Vesting Zone Change and Height District Change from C1-1VL-O to (Q) C2-2D-O to allow for an FAR of 4.5:1 (LAMC §§ 12.32 F and Q), and a reduction in parking not to exceed 20 percent, incident to a legislative action (LAMC § 12.32 P).

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project include the Wilshire Community Plan. Objective 2-3 and Policy 2-.31 of the Wilshire Community Plan is to enhance the visual appearance and appeal of commercial districts with a related policy to improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods, respectively. The Project would be consistent with this Objective and Policy of the Wilshire Community Plan as the Project would redevelop an existing low-rise building with a mixed-use medical office building with ground floor retail-commercial uses along Wilshire Boulevard and South San Vicente Boulevard, two main commercial corridors in this area of the City of Los Angeles. Development of the Project would enhance this commercial area as the placement of retail-commercial uses on the ground floor would serve to activate the streetscape. In particular, the Project proposes to include a café with indoor and outdoor seating on the corner of the Project Site where Wilshire Boulevard meets South San Vicente Boulevard. In addition, as shown in Figure 9, street trees and landscape planters would be installed along the sidewalks in the perimeter of the Project Site. Furthermore, the Project would be generally consistent with the heights of other commercial structures on Wilshire and South San Vicente Boulevards. As described above in Section 3, Project Description, of this Initial Study, surrounding buildings range from low-rise strip malls to a 22-story medical office buildings. In particular, directly northwest of the Project Site along South San Vicente Boulevard, is a five-story office building with existing rooftop billboards, and an associated four-story parking structure. Further north is a three-story rehabilitation center. Directly across from the Project Site in the City of Beverly Hills is a 10-story office building with ground floor commercial uses. North of the 10-story office building, is a three-story office/retail building and two apartment complexes, two- and three-stories in height. To the south, across from the intersection of South San Vicente Boulevard and Wilshire Boulevard, is a low-rise commercial center and associated surface parking. To the southeast, fronting Wilshire Boulevard is a 22-story medical office building owned by Cedars-Sinai Medical Center, which includes a rooftop heliport. Directly east of the Project Site, across from South Sweetzer Avenue, is a two-story brick building used as office space. West of the building, is a 12-story office building used by the Jewish Federation Goldsmith Center and the five-story Los Angeles ORT College.

Based on the above, with the approval of requested entitlements and development of the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no further evaluation of this topic is required in the EIR and no mitigation measures are required.

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 Project Site is located within an urbanized area of the City, which is characterized by moderate to high ambient nighttime artificial light levels. At night, surrounding development typically generates moderate to high levels of exterior lighting for security, parking, signage, and some architectural lighting. Street lights and the limited nighttime traffic on local streets also contribute to the light levels in the area. The Project would further contribute to ambient nighttime illumination during both construction and operation of the Project. In addition, the Project would introduce new building surface materials to the Project Site with the potential to generate glare.

It is expected that construction activities for the Project would occur primarily during daylight hours and that construction-related illumination in the nighttime would be used for safety and security purposes only, in compliance with LAMC requirements. Construction lighting also would last only as long as needed during the finite construction process. Construction activities would not require the use of large, flat, and shiny surfaces that would reflect sunlight or cause other natural glare.

As discussed above under Section 3, Project Description, of this Initial Study, new lighting required for the proposed development would include building identification, commercial accent lighting, wayfinding, balcony/garden lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security and ground-mounted. However, as required by LAMC Section 93.0117(b), exterior light sources and building materials would be designed such that they would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive residential land uses. With regard to glare, daytime glare is common in urban areas and is typically created when sun reflects off mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials, particularly following sunrise and prior to sunset. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. As discussed above under Section 3, Project Description, of this Initial Study, all glass used in the building would have minimal reflectivity to reduce glare to surrounding neighbors.

Based on the above, with adherence to regulatory requirements, construction and operation of the Project would not create a new source of substantial light or glare which would adversely affect daytime and nighttime views in the area. In any event, the Project cannot have a substantial adverse effect on aesthetic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no further evaluation of this topic is required in the EIR and no mitigation measures are required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is a developed infill lot containing a currently vacant building, formerly occupied by Montessori Children's World School, and a Big 5 Sporting Goods store. No agricultural uses or related operations are present on the Project Site or in the surrounding highly urbanized area. Furthermore, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.⁹ As the Project would not convert farmland to non-agricultural uses, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

No Impact. The Project Site is designated as Limited Commercial in the Wilshire Community Plan, with a corresponding zone of C1-1VL-O, which permits limited commercial and multi-family residential uses. The Project Site comprises a completely developed parcel in an urban area. No agricultural zoning is present in the Project vicinity, and neither the Project Site nor nearby parcels are enrolled under the Williamson Act.¹⁰ As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

No Impact. As discussed in the response to Checklist Question No. II.b, above, the Project Site is zoned C1-1VL-O, which permits limited commercial and multi-family residential uses. The Project Site is entirely developed with educational and retail uses. Furthermore, consistent with the built, urbanized area surrounding the Project Site, the larger Project vicinity is zoned for commercial uses and includes office and medical office uses on the north and south side of Wilshire Boulevard. No forest land or land zoned for timberland production is present on the Project Site or in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impact. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

No Impact. The Project Site is entirely developed with educational and retail uses. No forest land exists on-site or in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁹ California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland Map 2014, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf>. Accessed June 27, 2017.

¹⁰ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act Map FY 2015/2016, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf. Accessed June 27, 2017.

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

No Impact. There are no agricultural uses or related operations on or near the Project Site, which is located in a highly urbanized portion of the City. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The SCAQMD, together with the Southern California Association of Governments (SCAG), is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted March 3, 2017 and outlines the air pollution control measures needed to meet federal particulate matter (PM_{2.5}) and ozone (O₃) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several federal planning requirements and incorporates updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs.

The Project would support and be consistent with several key policy directives set forth in the AQMP. For example, the Project would provide for a range of employment opportunities with the development of new medical office and retail-commercial uses in the Project vicinity. The Project would provide employment opportunities from the proposed medical office space and ground floor retail-commercial space. The Project increases in employment would result in a small contribution to the anticipated employment growth for the period between 2019 and 2023 (the Project buildout year), for the Wilshire Community Plan and the City as a whole. The increase in growth would be consistent with SCAG's growth projections. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional

land use, housing, employment, and transportation programs, measures and strategies.”¹¹ Therefore, the Project would not exceed the growth projections in the AQMP.

In addition, the Project would locate new development in proximity to existing public transit facilities, including Los Angeles County Metropolitan Transportation Authority (Metro) rapid transit and local buses along Wilshire Boulevard, and the future Metro Purple Line station, located at the corner of La Cienega Boulevard and Wilshire Boulevard anticipated to be operational in 2023.¹² Specifically, the Project Site will be served by two planned Metro Purple Line stations, one at the corner of Wilshire Boulevard and La Cienega Boulevard, 0.25 miles to the west of the Project Site, and another at the corner of Wilshire Boulevard and Fairfax Avenue, less than one mile to the east of the Project Site. . With this proximity to readily available transit services, travel to the completed Project by employees and patrons is expected to include a substantial percentage of trips via transit and bicycle, replacing some trips that would typically occur via private automobiles. The Project Site is already served by existing roadway and utility infrastructure. Notwithstanding these attributes, the Project has the potential to increase the amount of traffic in the area and result in energy demand from the operation of medical office space and ground floor retail-commercial space, which would consequently generate operational air emissions that could affect implementation of the AQMP. Pollutant emissions resulting from construction of the Project would also have the potential to affect implementation of the AQMP. Therefore, the EIR will provide further analysis of potential impacts to implementation of the AQMP.

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. As discussed in the response to Checklist Question No. III.a, the Project could result in increased air pollutant emissions from construction, traffic, and energy consumption, within an air quality management area currently in non-attainment of federal and State air quality standards for O₃, PM₁₀, and PM_{2.5}. As such, implementation of the Project could potentially contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Therefore, the EIR will provide further analysis of potential cumulative impacts associated with an increase in criteria pollutants.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in an urbanized area of the City, which includes a mix of uses, including residential and other sensitive uses in the Project vicinity. Construction activities and operation of the Project could increase air emissions above current levels. Therefore, the EIR will provide further analysis of potential impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations generated by the Project.

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

Less Than Significant Impact. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in

¹¹ South Coast Air Quality Management District, 2012 Air Quality Management Plan, 2013, page 4-14, [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/main-document-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/main-document-final-2012.pdf). Accessed March 1, 2017.

¹² Metro, Metro Purple Line Extension FAQs, <https://www.metro.net/projects/westside/>. Accessed December 4, 2017.

manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. Activities and materials associated with Project construction would be typical of construction projects of similar type and size. On-site trash receptacles would be enclosed within interior spaces on Floor 1, and properly maintained in a manner that promotes odor control. Any odors generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. The Project proposes a mixed-use development that includes medical office and retail-commercial uses that would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people, such as uses associated with manufacturing, smelting, food packing, and other industrial uses. Odors associated with Project operation would be limited to those associated with on-site waste generation and disposal (e.g., trash cans, dumpsters), including odors relating to medical (biohazardous) waste, and occasional minor odors generated during food preparation activities and use of solvents, cleaners, and disinfectants. However, these odors would be highly localized, limited almost entirely to indoor activities, and if there are any atmospheric releases, these would readily disperse prior to reaching any off-site odor sensitive land uses. Waste would also be regularly collected and, because trash receptacles would be located within the Project's interior, any potential odors from on-site waste disposal would not affect surrounding land uses. Thus, Project operation is not expected to create objectionable odors and odor impacts would be less than significant. Therefore, impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis of impacts to biological resources is based, in part, on the Tree Report prepared by MJS Landscape Architecture in January 2017. The Tree Report is included as Appendix A of this Initial Study.

- 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 entirely developed with educational and retail uses and associated surface parking. The California Department of Fish and Wildlife and U.S. Fish and Wildlife Service databases do not identify any candidate, sensitive or special status species critical habitat on or around the Project Site. As discussed in the Tree Report, provided in Appendix A, of this Initial Study, the Project Site contains minimal landscaping including seven (7) ornamental, non-protected trees, within the surface parking area, 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 migratory bird species 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 the taking 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. As such, the Project would comply with the MBTA to avoid disturbances of nesting birds and to protect nesting birds if they are present on-site during construction. Therefore, with compliance of these regulatory measures, the 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. No further analysis of this topic in the EIR is required.

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

No Impact. As discussed in the response to Checklist Question No. IV.a, the Project Site is located in an urbanized setting and is entirely developed with educational and retail uses. The Project Site does not contain any drainage channels to the Los Angeles River (located approximately 5.3 miles to the north of the Project Site), riparian habitat, or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area as defined by the City and County of Los Angeles.^{13,14} Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community. No impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

¹³ City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1B, Biological Resource Areas (Metro Geographical Area), January 19, 1995, at page 2.18-4, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf. Accessed June 30, 2017.

¹⁴ County of Los Angeles Department of Regional Planning, County of Los Angeles Significant Ecological Areas Program, Figure 9.3, Significant Ecological Areas and Coastal Resources Areas Policy Map, February 2015, http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed June 30, 2019.

- 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. As discussed in the response to Checklist Question No. IV.a, the Project Site is located in an urbanized setting and is entirely developed with educational and retail uses. The surrounding area has been fully developed with urban uses and associated infrastructure. The nearest water body is the Franklin Canyon Reservoir, located approximately 3.4 miles from the Project Site. The Project Site does not contain any wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands. No impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

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

Nonetheless, as stated in response to Checklist Question No. IV.a, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Wildlife Code prohibit the taking of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The potential exists for protected bird species to be nesting in the street trees during Project construction. In order to avoid disturbance of nesting birds, the Project would be consistent with the MBTA to avoid disturbance of nesting birds and to protect nesting birds if they are present on-site during construction. With the implementation of regulatory measures, impacts to sensitive plant and animal species would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

- 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. There are no native tree species within the Project Site that would be subject to the protection of LAMC Section 96.303.5, Section 1. Subdivision 12 of Subsection A of Section 12.21, as amended (Ordinance No. 177404).

As stated in the response to Checklist Question No. IV.a, the Project Site is a developed lot with seven (7) unprotected trees and no natural open space areas. Specifically, as discussed further in the Tree Report, included as Appendix A of this Initial Study, there are four Paper bark trees (*Melaleuca quinquenervia*), three Mexican fan palms (*Washingtonia robusta*), and miscellaneous shrubs currently on the Project Site. All seven trees would be removed for development of the Project Site. No locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected under the City of Los Angeles Protected Tree Ordinance

(Chapter IV, Article 6 of the LAMC) exist on the Project Site. As discussed under Section 3, Project Description, of this Initial Study, the Project would replace all significant, non-protected trees (8 inch or greater or cumulative trunk diameter if multi-trunked, as measured 54 inches above ground) at 1:1 ratio with a minimum of 24-inch box tree. All of the trees on the Project Site are significant, unprotected trees.

In addition, there no street trees existing in the vicinity of the Project Site. However, the Project proposes to include 17 street trees in the western, eastern, and southern perimeter of the Project Site, as illustrated in Figure 9, above. All other landscaping on the Project Site would comply with all requirements of the LAMC and the City's Urban Forestry Division's requirements.

Therefore, the Project would conform with and not conflict with local policies or ordinances protecting biological resources. Impacts would be less than significant. No further analysis of this topic in the EIR is necessary and no mitigation measures are required.

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

No Impact. As discussed in the response to Checklist Question No. IV.a, the Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.^{15,16} Therefore, the Project would not conflict with the provisions of any adopted conservation plan. No impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

¹⁵ California Department of Fish and Wildlife, Habitat Conservation Planning, Natural Community Conservation Planning, Summary of Natural Community Conservation Plans (NCCPs), August 2015, <https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans>. Accessed June 30, 2017.

¹⁶ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 654 San Vicente Boulevard. Generated July 3, 2017.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

As the building located at 6601 Wilshire (Big 5 Sporting Goods store) was constructed in 1977, it does not meet the 45-year age threshold for a historical resource as defined by the Office of Historic Preservation (OHP).¹⁷ However, the 650–654 South San Vicente Boulevard building was constructed in 1945 and the 658 South San Vicente Boulevard building was constructed in 1951. By 2003, the two buildings were combined into one building, known as 650 South San Vicente Boulevard (the Montessori Children's World School). Based on the age of the building previously occupied by the Montessori Children's World School, the EIR will provide further analysis of potential direct and indirect impacts to historical resources.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the State *CEQA Guidelines* generally defines archaeological resources as any resource that “has yielded, or may be likely to

¹⁷ Office of Historic Preservation, Instructions for Recording Historical Resources, March 1995.

yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with buildings and surface parking. However, due to the age of the on-site improvements and the possible lack of associated grading or excavations at the time of construction, historical disturbance of the underlying soils may have been minimal and the potential for the existence of extant archaeological resources is unknown and archaeological resources may be present. Project construction would require grading and excavation activities for building foundations that could have the potential to disturb existing or undiscovered archaeological resources. Therefore, the EIR will provide further analysis of potential impacts to archaeological resources.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As previously indicated, the Project Site has been previously graded and developed. According to the results of the cultural resources records search from the SCCIC, no known human remains have been identified within the Project Site or in the vicinity. Nonetheless, the Project Site would require grading and excavation activities for building foundations that would extend into soils that could be conducive to retaining human remains. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during construction or the course of any ground disturbance activities, the Project would adhere to standard conditions of approval required by the City. Consistent with these standard conditions of approval, all construction or ground disturbing activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the human remains pursuant to California Public Resources Code Section 5097.98. If the human remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would be constructed in accordance with applicable laws and regulations, including applicable state and federal laws, and building regulations pursuant to the LAMC and City of Los Angeles Green Building Code (LAGBC) that are intended to promote efficient utilization of resources and minimize environmental impacts. Furthermore, 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 Project shall meet a construction waste reduction of at least 50 percent.

With respect to Project operations, the 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 achieve 35 percent renewable energy by 2020. Furthermore, the Project would be designed and constructed to meet LAGBC standards, where applicable. The Project would include ENERGYSTAR-rated appliances and install energy-efficient boilers, heating, 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 Project would be developed to meet or exceed the energy efficiency standards of the LEED Silver Certification or equivalent green building standards, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy sources. However, as a conservative approach to ensure that Appendix F of the *CEQA Guidelines*, which provides that potentially significant energy implications of a project shall be considered in the EIR to the extent relevant and applicable to the project, is fully addressed, the energy use and conservation features of the Project will be further analyzed in the EIR.

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

Potentially 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.

Local plans adopted for the purposes of promoting energy efficiency include L.A.'s Green New Deal (Sustainable City pLAn 2019), the LAGBC, and LADWP's 2017 Power Strategic Long-Term Resource Plan. As stated above, the Project would be constructed in accordance with applicable laws and regulations, including applicable state and federal laws, and building regulations pursuant to the LAMC and LAGBC, that are intended to promote efficient utilization of resources and minimize environmental impacts. Thus, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. However, as discussed above, as a conservative approach to ensure that Appendix F of the State *CEQA Guidelines* is fully addressed, a discussion of the Project's consistency with state or local plans for renewable energy or energy efficiency will be further analyzed in 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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. The Project Site is located in a seismically-active region of California; however, the closest active fault to the Project Site is the Santa Monica fault, which is located approximately 0.9 miles to the west, and the Hollywood fault, located approximately 1.5 miles to the north.¹⁸ Therefore, the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone nor is it located on or immediately adjacent to an active fault.¹⁹ Alquist-Priolo Zones are designated areas most likely to experience surface fault rupture, although fault rupture is not necessarily restricted to those specifically zoned areas. As the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone and is not located on or immediately adjacent to an active fault, there would be a less-than-significant impact related to fault rupture hazards. Moreover, the Project would have no effect on seismic conditions that have previously created faulting or which could result in seismically-induced faulting. Therefore, impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

ii. **Strong seismic ground shaking?**

Less Than Significant Impact. As noted above, the Project Site is located in a region with numerous active faults that have a high potential for future seismic activity. A 2014 study by the USGS indicates that there is a 93 percent likelihood of a Richter magnitude 6.7 or higher earthquake occurring in the Southern California region in 30 years from 2014.²⁰ The Project Site could experience a range of ground shaking effects during an earthquake on any one of the active faults in the region.²¹ Depending on a variety of factors such as distance to the epicenter, magnitude of the event, and behavior of underlying materials, ground shaking could be significant. Seismic shaking of this intensity can also trigger ground failures caused by liquefaction,²² potentially resulting in foundation damage, disruption of utility service, and roadway damage. The Project would be required to adhere to the seismic standards of the most recent version of the California Building Code, which includes measures to ensure that structures can withstand maximum expected ground shaking without catastrophic failure. While complete avoidance of any damage may not be feasible, incorporation of industry standard seismic design measures in

¹⁸ Byer Geotechnical, Incorporated, Geologic and Soils Engineering Exploration, July 25, 2019.

¹⁹ An active fault is defined by the State of California is a fault that has had surface displacement within Holocene time (approximately the last 11,000 years). A potentially active fault is defined as a fault that has shown evidence of surface displacement during the Quaternary (last 1.6 million years), unless direct geologic evidence demonstrates inactivity for all of the Holocene or longer. This definition does not, of course, mean that faults lacking evidence of surface displacement are necessarily inactive. Sufficiently active is also used to describe a fault if there is some evidence that Holocene displacement occurred on one or more of its segments or branches.

²⁰ United States Geological Survey (USGS), UCERF3: A New Earthquake Forecast for California's Complex Fault System, USGS Fact Sheet 2015-3009, March 2015.

²¹ Shaking intensity is a measure of ground shaking effects at a particular location, and can vary depending on the overall magnitude of the earthquake, distance to the fault, focus of earthquake energy, and type of underlying geologic material. The Modified Mercalli (MM) intensity scale is commonly used to measure earthquake effects due to ground shaking. The MM values for intensity range from I (earthquake not felt) to XII (damage nearly total).

²² Liquefaction is the process by which saturated, loose, fine-grained, granular, soil, like sand, behaves like a dense fluid when subjected to prolonged shaking during an earthquake.

accordance with current building requirements would ensure that potential impacts related to ground shaking would be less than significant. The Project would not otherwise exacerbate existing environmental conditions including seismic hazards related to strong seismic ground shaking. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. According to mapping compiled by the California Geological Survey under the Seismic Zonation Program, the Project Site is located in an area that is considered to have a high susceptibility for liquefaction.²³ Therefore, the EIR will provide further analysis related to liquefaction.

iv. Landslides?

No Impact. The Project Site is located in a developed urban area that is relatively level that would not be susceptible to landslides, either on- or off-site. The Project Site is relatively flat as it has an elevation of 147 feet on the northern corner of the Project Site and an elevation of 137 feet on the southern corner of the Project Site; thus, there is little to no slope that could result in a landslide on-site. In addition, ZIMAS does not designate the Project Site as being susceptible to landslides.²⁴ As a result, there would be no impacts related to seismically induced landslides. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

Less Than Significant Impact. Project construction would include grading and earthmoving activities at the site that could expose site soils to erosion from heavy winds, rainfall, or runoff. Construction activities would be conducted in accordance with applicable City standard erosion control practices required pursuant to the CBC and the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. In accordance with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. BMPs include maintenance, inspection, and repair of erosion and sediment control measures and water quality BMPs throughout the construction period. Once constructed, disturbed areas would be protected by coverings such as structures, pavement, concrete, or vegetation, such that the potential for subsequent erosion is very low. Therefore, with implementation of the required construction period erosion control BMPs, the potential for soil erosion at the Project Site would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

²³ California Geologic Survey (CGS), Seismic Hazard Zonation Program, Hollywood Quadrangle, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf. Accessed on August 2, 2019.

²⁴ 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 February 2019.

- 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?**

Potentially Significant Impact. As previously discussed in response to Checklist Question VII.a.iii and a.iv, liquefaction hazards were concluded to be potentially significant and landslide hazards were concluded to have no impact. Subsidence occurs when a void is located or created underneath a surface, causing the surface to collapse. Common causes of subsidence include groundwater or oil resources or wells beneath the surface. Subsidence occurs when land is displaced vertically, usually due to withdrawal of groundwater, oil, or natural gas. As discussed in Phase I Environmental Site Assessments (ESAs) conducted for the Project and provided in Appendix B of this Initial Study, the review of the available database for Division of Oil, Gas, and Geothermal Resources (DOGGR) indicated that a historic buried and idle oil well had been located on the northeastern portion of the Project Site; however, the well never produced any oil and there is no evidence of oil production activities on the Project Site. In addition, the Project Site is located within a potential liquefaction hazards zone.²⁵ Therefore, the EIR will provide further analysis related to unstable geologic units.

- 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?**

Potentially Significant Impact. Expansive soils are generally clayey soils or soils that have sufficient clay content such that they swell when wetted and shrink when dried. Expansive soils located beneath structures can result in cracks in foundations, walls, and floors that develop over time from long term cyclical wetting and drying periods. Therefore, the EIR will provide further analysis of potential impacts related to expansive soils.

- 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. The Project Site is located in an urbanized area with existing wastewater infrastructure. The Project would connect to existing sewer infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

Potentially Significant Impact. The Project Site is currently developed with buildings and surface parking. However, due to the age of the on-site improvements and the possible lack of associated grading or excavations at the time of construction, historical disturbance of underlying soils may have been minimal. The Project area may include formations known to be sensitive for significant paleontological resources. The Project would require grading and excavation for building foundations and subterranean parking that could extend into native soils potentially containing undiscovered paleontological resources. Therefore, the EIR will provide further analysis of potential impacts to paleontological resources.

²⁵ California Geologic Survey (CGS), Seismic Hazard Zonation Program, Hollywood Quadrangle, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf. Accessed on August 2, 2019.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. Construction and operation of the Project would increase greenhouse gas (GHG) emissions that have the potential to either individually or cumulatively result in a significant impact on the environment. The Project would generate vehicle trips and result in building energy demand that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. Therefore, the EIR will provide further analysis to quantify and categorize the sources of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce indirect GHG emissions related to energy consumption through various energy conservation measures incorporated as energy efficient building design features, such as energy efficient building heating, ventilation and cooling (HVAC) systems, energy efficient lighting, and water efficient fixtures. Furthermore, because the Project would be designed to meet LEED Silver Certification or equivalent green building standards, the Project would incorporate sustainable elements of design during construction and operation, including specific measures that would reduce indirect GHG emissions such as cool roofs, improved building insulation, energy efficient glazing, or other measures that would reduce building energy demand. However, the GHG emissions and GHG reductions from already adopted building code standards, renewable energy portfolio requirements for utility agencies, low carbon content automotive fuels, etc. have not been estimated at this time. The Project's GHG footprint and design characteristics remain to be considered with respect to GHG reduction strategies identified in the California Air Resources Board's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and City of Los Angeles Green Building Code. Therefore, the EIR will provide further evaluation of the Project's consistency with these plans.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following hazardous materials discussion is based, in part, on the *Phase I Environmental Site Assessment of 656 South Vicente Boulevard, Los Angeles California, 90048*, prepared by EMG, July 8, 2016 (for the Big 5 Sporting Goods store) and the *Phase I Environmental Site Assessment of 650 South Vicente Boulevard, Los Angeles California, 90048*, prepared by EMG, September 22, 2016 (for the Montessori Children's World School). The Phase I Environmental Site

Assessments (Phase I ESAs) were performed in conformance with the scope and limitations of American Society for Testing and Materials (ASTM) practice (Standard E 1527-13) for the Project Site. Both Phase I ESAs, which are included as Appendix B of this Initial Study, were conducted to evaluate the presence of known or suspected hazardous materials or wastes on the Project Site.

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

Less Than Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions in accordance with BMPs contained in the required Stormwater Pollution Prevention Plan (SWPPP). In addition, all construction work would be performed consistent with applicable Federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and California OSHA (Cal/OSHA) requirements to ensure the safety and well-being of construction workers.

Due to the age of the on-site structures asbestos containing materials (ACM) and lead based paint (LBP) may be present on-site. Consistent with existing regulations, the Project would perform an assessment and remediation or abatement of these materials, as necessary, before building demolition commences. Adherence to applicable regulations would reduce risks associated with the transport, use or disposal of hazardous materials during construction to less than significant.

Operation of the medical office and retail-commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of general office and building maintenance supplies (cleaning solvents, painting supplies, and pesticides for landscaping) as well as medical (biohazardous) waste such as needles, used bandages, and IV catheters. The use of these materials would be in regulated quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. The Medical Waste Management Act, part of the California Health and Safety Code 117600-118360, was adopted by the state legislature in 1990 and regulates the generation, handling, storage, treatment and disposal of medical waste. The Medical Waste Management Program ensures protection of public health and safety and the environment, through the implementation and enforcement of regulations that apply to the handling, storage, treatment, and disposal of biohazardous waste. In Los Angeles County, the California Department of Public Health is the local enforcement agency for the Medical Waste Management Act. All potentially hazardous materials generated from the medical office would be disposed of in compliance with the applicable regulations in accordance with a Hazardous Materials Management Plan, which would be required for the proposed facility. Therefore, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant. No further analysis of this topic in the EIR is required.

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. Project construction would involve the use of hazardous materials such as fuels, oils, solvents, and paints. Mishandling of these materials could expose construction workers or the public to unknown hazardous materials should such materials be present. However, as noted above, construction would be required to adhere to a SWPPP with BMPs that include measures to safely store, transport, and dispose of hazardous materials such that adverse effects from upset and accident conditions would be minimized. In the unlikely event that such a release would occur, the SWPPP contains BMPs that would address spill response protocols to reduce potential exposure risks to less than significant levels.

Also, as noted above, operation of the Project would not involve the routine use, storage, transport, or disposal of notable quantities of hazardous materials. Hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, or pesticides for landscaping, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. These regulations include adherence to the Medical Waste Management Act to address any potential upset and accident conditions associated with biohazardous waste that would be generated within the medical office spaces. Applicable provisions and regulations of the Medical Waste Management Act would include development of a Medical Waste Management Plan as well as adherence to treatment, containment and storage provisions for medical waste generated by the Project. The Medical Waste Management Plan describes how the medical waste generated by the Project would be segregated, handled, stored, packaged, treated, or shipping for treatment, as applicable. All hazardous materials would be managed on-site through the preparation and implementation of a Hazardous Materials Management Plan that would include preparing an inventory of all hazardous materials and wastes on-site, protocols for storage, and spill response measures to contain any inadvertent releases that might occur.

Asbestos Containing Materials (ACMs)

The Project Site is currently developed with on-site structures that were built before the 1978 federal regulations banning the use of ACMs. According to the associated Phase 1 ESA there is a potential for ACMs to exist at the Project Site. If not handled properly, there is a potential for ACMs to be released into the environment during demolition, posing a potential hazard to construction workers and/or the public. In accordance with SCAQMD Rule 1403, the Project would be required to conduct a comprehensive asbestos survey prior to demolition, which would be subject to approval by the Los Angeles Department of Building and Safety (LADBS). In the event that ACMs are found within areas proposed for demolition, suspected materials would be removed by a certified asbestos abatement contract in accordance with applicable regulations. With compliance of SCAQMD Rule 1403, construction activities under the Project would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. As such, associated impacts to ACMs would be less than significant.

Lead-Based Paint (LBP)

The Project Site is currently developed with on-site structures that were built before 1978, when the Lead Paint Poisoning Act was passed by Congress. Therefore, there is a potential for LBPs

to be present on the Project Site. In the event that LBPs are found, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to Cal/OSHA regulations. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 establishes the rules and procedures for conducting demolition and construction activities and establishes exposure limits, exposure monitoring, and respiratory protection for workers exposed to lead. With compliance of procedural requirements and regulations for the proper removal and disposal of LBP, including those required by Cal/OSHA, construction activities under the Project would not expose people to a substantial risk resulting from the release of LBPs into the environment. As such, impacts related to LBPs would be less than significant.

Radon Gas

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The United States Environmental Protection Agency (USEPA) has prepared a map to assist national, state, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the list below:

EPA RADON ZONES

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

The Project Site within the EPA classification as Zone 2 (Moderate). Due to the Zone 2 classification and the design of the Project, which would require excavation for building foundations and ground floor retail-commercial uses, radon is not considered to be a significant environmental concern for the Project Site. Therefore, impacts related to radon would be less than significant.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. These substances have been listed as carcinogens by U.S. EPA. PCBs were banned from general commercial use in 1977. PCBs are regulated by the U.S. EPA under the Toxic Substances Control Act (TSCA). The TSCA contains provisions controlling the continued use and disposal of existing PCB-containing equipment. Items which may potentially impact the Project Site with PCBs include electrical capacitors and transformers, fluorescent light ballasts, hydraulic oils used in hydraulic lifts and elevators, vacuum pumps, gas turbines, and other petroleum products manufactured prior to the 1977 ban.

As stated in the Phase I ESA prepared for 650 South San Vicente Boulevard, Los Angeles, CA, 90048 (Montessori Children's World School), no transformers, capacitors, or any hydraulic equipment exist on the Project Site which could indicate the presence of PCBs. As stated in the Phase I ESA prepared for 656 South Vicente Boulevard, Los Angeles, CA 90048, (Big 5 Sporting

Goods Store), three oil cooled transformers mounted on poles could have the potential to contain PCBs. However, as discussed further in the Phase I ESA, the presence of the equipment would not represent a significant impact. As also discussed in the Phase I ESA, a handicap access lift installed after 1979 is also present on the Project Site, but it is unlikely to be PCB-contaminated based on the age of the equipment. Based on the observations detailed in the Phase I ESAs, impacts related to PCBs would be a less than significant impact.

Methane

The Project Site has been identified by the City of Los Angeles Department of Building and Safety to be within a “Methane Zone.”²⁶ These areas have a risk of methane intrusion emanating from geologic formations. This is an existing conditions and not an effect of the project. Methane gas is combustible with a lower explosive limit (LEL) of approximately 5 percent, v/v (percent volume) in air. OSHA regulates worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Due to the potential environmental (e.g. flammability, combustibility) and health (e.g. asphyxiation from oxygen displacement) risk associated with construction in a Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City. Development would occur per the provisions of the City’s Building Code, Chapter 71 Methane Mitigation Standards Ordinance. This ordinance provides information describing the installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance defines requirements for site testing, methane mitigation systems, and ventilation systems. Per Chapter 71, the Project would be subject to the design and permitting requirements established by LADBS as defined in LAMC Section 91.7102 for a Project Site located within a Methane Zone.

Compliance with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment, with impacts being less than significant. Therefore, impacts related to methane would be less than significant.

In conclusion, with implementation of regulatory requirements discussed above, the Project would 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. Impacts would be less than significant. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. There are no K-12 schools within 0.25 miles of the Project Site. A private non-profit junior college, Los Angeles ORT College, is located at 6435 Wilshire Boulevard approximately 823 feet to the east down Wilshire Boulevard.

Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels,

²⁶ City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 654 San Vicente Boulevard. Generated July 3, 2017.

and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. Hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, or pesticides for landscaping, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Medical wastes that would be generated in the medical office spaces would include a variety of biohazardous waste materials subject to regulation under the Medical Waste Management Act to address any potential upset and accident conditions associated with biohazardous waste. All hazardous materials would be managed on-site through the preparation and implementation of a Hazardous Materials Management Plan that would include preparing an inventory of all hazardous materials and wastes on-site, protocols for storage, and spill response measures to contain any inadvertent releases that might occur. Therefore, operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the two schools noted above that are within 0.25 miles of the Project Site. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List [NPL]); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

Recognized Environmental Conditions

The Phase I ESAs, evaluated the presence of Recognized Environmental Conditions (RECs) through a Project Site reconnaissance, interviews, Sanborn Maps, research of land use records, and aerial photography review. The Phase I ESAs also contained a database search of government record sources (e.g., EDR Radius Report, U.S. EPA, Department of Health Services, and Regional Quality Control Board) and other sources for preliminary indications of hazardous material usage and releases at the Project Site and within a one-mile radius of the Project Site.

As stated in both the Phase I ESAs, no RECs nor historic RECs were identified on the Project Site. A review of the available database for Division of Oil, Gas, and Geothermal Resources (DOGGR) indicated that a historic buried and idle oil well had been located on the northeastern portion of the Project Site; however, the well never produced any oil and there is no evidence of oil production activities on the Project Site. As stated in the Phase I ESA prepared for the Montessori Children's World School, the Karl Storz Endoscopy America facility, previously located on-site at 650 South San Vicente Boulevard, was listed in the HAZNET database as generating asbestos-containing waste, organic solids, and laboratory waste chemicals in 1994 but no record of any unauthorized releases. As the information provided in the database is not indicative of a REC, no further action or investigation was recommended. Furthermore, the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A review of regulatory databases maintained by county, State, and federal agencies found no documentation of hazardous materials violations or discharge on the Project Site. A review of the DTSC EnviroStor and SWRCB GeoTracker databases, as well as other databases maintained by other government agencies, did not indicate any open cleanup sites or hazardous waste facilities within the project area.^{27,28} the off-site regulatory database review indicated that there were no sites in the vicinity of the Project Site with a reasonable potential to adversely affect the Project. Therefore, according to the review of regulatory and historical records, the Phase I ESAs revealed no evidence of RECs, historical RECs, or controlled RECs in connection with the Project. Therefore, there is a less-than-significant impact with respect to hazardous materials sites pursuant to Government Code Section 65962.5. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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 Project Site is not located within an airport land use plan, is not within two miles of a public airport or public use airport, nor is it within the vicinity of a private airstrip. The closest airports to the Project Site are the Santa Monica Municipal Airport, located approximately 5.7 miles southwest of the Project Site, and Los Angeles International Airport (LAX), located 8.7 miles southwest of the Project Site. However, the Project is located approximately 4,900 feet to the southeast of the private Cedars-Sinai Medical Center Heliport. While proximity to a helipad is not a CEQA issue, it has been considered as part of this Initial Study as any building or structure that penetrates the established airspace surfaces of the approach or departure paths established during the licensing of the Cedars-Sinai Medical Center Heliport could be considered "obstructions" to air navigation by Caltrans Division of Aeronautics.

The Cedars-Sinai Medical Center Heliport was licensed by the State of California on February 24, 2006. The Project Site does not lie within any of the approach or departure paths established for the heliport. The overall height of the proposed building is 230 feet above ground level (to the top of the mechanical penthouse). When combined with the average Project Site elevation of 145 feet above mean sea level (AMSL), the overall height of the proposed building will be 375 feet AMSL.

²⁷ Department of Toxic Substances Control (DTSC). 2019. EnviroStor Database. Available at <http://www.envirostor.dtsc.ca.gov/public/>. Accessed February 27, 2019.

²⁸ California State Water Resources Control Board (SWRCB). 2019. GeoTracker Database. Available at: <https://geotracker.waterboards.ca.gov/>. Accessed February 27, 2019.

While this is slightly higher than the established Cedars-Sinai Medical Center Heliport deck elevation of 334 feet AMSL, it is below any of the airspace surfaces established for the heliport. This is due to the proposed building's location nearly one mile to the southeast, away from any of the approach or departure paths established for the heliport. With regard to construction, it is assumed that the temporary tower crane would have an overall height about 60 feet above final building height. This temporary tower crane height would therefore be approximately 435 feet ABMSL. While this is also slightly higher than the Cedars-Sinai Medical Center Heliport deck elevation, again, the Project Site is not within the vicinity of the approach and departure paths established for the heliport.²⁹

Based on the analysis above, neither the permanent building nor the temporary tower crane associated with the construction of the Project would impact the established approach and departure surfaces to the Cedars-Sinai Medical Center Heliport. It is however, recommended that the appropriate Federal Aviation Administration (FAA) obstruction lights be considered for both the roof of the permanent building and the temporary crane given their proximity to the heliports. Therefore, the Project would result in no impact with respect to an increase in safety hazards for people residing or working in project areas 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, or in the vicinity of a private airstrip; and would result in a less-than-significant impact involving potential air traffic hazards associated with existing helipads within a mile of the Project Site. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by an existing road network. As shown in the City of Los Angeles Safety Element, South San Vicente Boulevard and Wilshire Boulevard, which are located directly adjacent to the Project Site to the west and south, respectively, are Selected Disaster Routes that could be utilized during a disaster event.³⁰ While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in an increase to traffic accessing the Project Site and on South San Vicente Boulevard and Wilshire Boulevard. However, the proposed Project would maintain emergency access to and from the Project Site and in the surrounding area, provided that future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents; and Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD) and Los Angeles Department of Transportation (LADOT), to ensure that access to the

²⁹ Cedars-Sinai Medical Center Heliport Permit, dated February 24, 2006.

³⁰ City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles, <http://cityplanning.lacity.org/cwd/gnpln/safteyelt.pdf>. Accessed July 3, 2017.

project does not interfere with existing disaster routes. Because the Project would not cause an impediment along the City's designated emergency evacuation route or disaster route, and the proposed medical office and retail-commercial uses would not impair implementation of the City's emergency response plan, the Project would have a less-than-significant impact with respect to these issues. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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 a highly urbanized area, where there are no areas containing flammable brush that could trigger wildfires. No wildlands are present on the Project Site or surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area.³¹ In addition, the Project Site is not located within a City-designated Very High Fire Severity Zone.³² Therefore, the Project would not expose people or structures to a significant risk involving wildland fires caused in whole or in part from the Project's exacerbation of existing environmental conditions and no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

³¹ City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, <http://cityplanning.lacity.org/cwd/gnlpn/safetyelt.pdf>. Accessed July 3, 2017.

³² City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS) Parcel Profile Report: 654 San Vicente Boulevard. Generated July 3, 2017.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following hydrology and water quality discussion is based, in part, on the *Water Resources Technical Report* (Hydrology Report), prepared by KPFF Consulting Engineers on July 9, 2019 as well as the *Utility Technical Report: Water, Wastewater* (Utility Report), also prepared by KPFF Consulting Engineers on July 9, 2019. The reports are included as Appendices C and D of this Initial Study, respectively.

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

Less Than Significant Impact. The Project Site is currently developed with two existing structures and surface parking, and is 95 percent covered with impermeable surfaces that generate and convey urban runoff. Underground storm drainage facilities along South San Vicente Boulevard and South Sweetzer Avenue are owned and maintained by the City of Los Angeles. Under existing conditions, stormwater runoff enters the catch basins located on South San Vicente Boulevard, South Sweetzer Avenue, and Orange Street. Catch basins convey the stormwater through a 36-inch and a 24-inch storm pipe located along South San Vicente Boulevard. The existing 36-inch pipe runs southwards from Orange Street towards the middle of the Project Site where it connects into a 12.5-foot wide and 10-foot tall reinforced storm drain concrete box. The 24-inch storm drain pipe runs northward along from Sweetzer Avenue towards the middle of the Project Site where it connects to the same reinforced concrete box. The reinforced concrete box drains into Ballona Creek which is located 1.8 miles south from the Project Site. Ballona Creek generally flows southwest, ultimately discharging into the Pacific Ocean at the Santa Monica Bay. Ballona Creek is designed to discharge to Santa Monica Bay approximately 71,400 cubic feet per second from a 50-year frequency storm event.³³

According to the Water Resources Technical Report, drainage at the Project Site does not currently include any stormwater BMPs and has no current means of treatment for stormwater runoff. No data was available to quantify current stormwater quality, but contaminants typical of developed areas like the Project Site would likely include one or more of the following: sediments, trash, bacteria, metals, nutrients, organics and pesticides. However, the report also noted that the Project Site currently exhibits good housekeeping practices and complies with existing hazardous waste regulations which can lessen the potential for some of these contaminants.³⁴

The majority portion of the existing Project Site runoff flows towards South San Vicente Boulevard and discharges into the existing catch basin located towards the middle of the Project Site. The rest of the stormwater flow into the existing catch basin located at the southern corner by South Sweetzer Avenue. The northeastern portion of the runoff flows into the alley, where it flows along a longitudinal gutter towards both Orange Street and South Sweetzer Avenue. The flow enters into a catch basin on South Sweetzer Avenue at the northeastern corner of the South San Vicente Boulevard and South Sweetzer Avenue intersection, or into a catch basin on Orange Street at the southeastern corner of the South San Vicente Boulevard and Orange Street intersection.

Construction of the Project would require earthwork activities, including grading and excavation of the Project Site, and the potential transport of sediments. During precipitation events in particular, construction activities associated with the Project have the potential to result in the conveyance of sediments due to minor soil erosion during grading and soil stockpiling and subsequent siltation, as well as other pollutants associated with construction wastes, fuels and trash into municipal storm drains. However, the Project Site is less than one acre and therefore would not be required to adhere to the National Pollution Discharge Elimination System (NPDES) Construction General Permit which only applies to sites greater than one acre. Nonetheless, Project construction would be required by the City to prepare and implement an erosion control plan to reduce runoff and pollutant levels in runoff during construction. The erosion control plan

³³ KPFF Consulting Engineers, Water Resources Technical Report, 656 South San Vicente Boulevard, Los Angeles, CA, July 9, 2019.

³⁴ KPFF Consulting Engineers, Water Resources Technical Report, 656 South San Vicente Boulevard, Los Angeles, CA, July 9, 2019.

would include BMPs such as use of silt fences and catch basin inlet protection barriers, that would be effective in minimizing transport of sediment and other construction related pollutants. In addition, the Project would be required to comply with City grading permit regulations, which require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, considering the relatively small size of the disturbance at the Project Site and adherence to the existing regulatory requirements for construction activities, the potential water quality impacts during construction would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

The Project would be required to include drainage control requirements into the project design to protect receiving waters from discharge of potential pollutants in accordance with the City's Standard Urban Stormwater Mitigation Plan, which complies with the Regional NPDES Municipal Separate Storm Sewer Systems permit. These requirements include Low Impact Development (LID) measures to address water quality of stormwater runoff as well as runoff volumes. Under section 3.1.3 of the LID Manual, post-construction stormwater runoff from a new development must be infiltrated, evapo-transpired, captured and used, and/or treated through high efficiency BMPs on-site for at least the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event. The subsurface conditions at the Project Site have been characterized as having limitations on the ability to infiltrate stormwater runoff on-site. However, in accordance with the LID requirements, the Project would implement a capture and use system³⁵ and/or a biofiltration system as a BMP for managing stormwater runoff that would still meet these LID requirements. Since it appears there are currently no existing on-site BMPs, stormwater runoff during post-Project conditions could result in improved water quality from implementation of the required BMPs. Therefore, the potential impact related to water quality requirements would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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. LADWP is the water purveyor for the City. Water is supplied to the City from three primary sources, including the Metropolitan Water District's Colorado River and Feather River supplies (57 percent, Bay Delta 48 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29 percent), local groundwater from the Los Angeles Central Groundwater Subbasin (12 percent), as well as recycled water (2 percent).³⁶ Based on the City's most current Urban Water Management Plan (UWMP), in 2014 and 2015, LADWP had an available water supply of roughly 611,800 acre-feet, with approximately 18 percent coming from local groundwater.³⁷

³⁵ A capture and use system would likely consist of a subsurface retention basin to store stormwater runoff.

³⁶ Los Angeles Department of Water and Power: Facts and Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=j77lkjtw_4&_afLoop=357285129360562. Accessed July 20, 2017.

³⁷ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-S – Service Area Reliability Assessment for Average Weather Year, adopted June, 2016, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased. Accessed July 20, 2017.

The Project Site is located in a highly urbanized area of Los Angeles and is currently occupied by two buildings, hardscape, landscape and paved parking lots with 95 percent impervious surface coverage. As such, the Project Site does not currently provide a substantial opportunity for recharge of groundwater. Construction activities for the Project would include excavating down an approximate depth of 6 feet for building up the structure, and hardscape and landscape around the structure as well as the installation of caissons of up to 100 feet in depth. As discussed in the Water Resources Technical Report, groundwater was measured at a depth of 34 feet below ground surface.

Groundwater levels in the City are actively maintained via spreading grounds and recharge. Groundwater encountered during excavation will be directed to a temporary dewatering system, consisting of pumps and filtration system utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. Any construction related dewatering would be temporary, and would not be of an extent that would substantially alter groundwater supplies.

Operation of the Project would decrease the amount of impervious surface area on the Project Site from 95 percent under existing conditions to 92 percent after development is completed which would increase the amount of runoff that could infiltrate on-site. The Project would also implement capture and use systems and/or a biofiltration system to collect and store the first flush of stormwater runoff. No dewatering would be required during operation of the Project. Therefore, the Project would not substantially deplete groundwater supplies nor interfere with groundwater recharge. With implementation of City of Los Angeles LID requirements, including those described in response to Checklist Question No. IX.a, above, and the overall increase in pervious surfaces and infiltration potential, impacts with respect to the depletion of the groundwater table would be less than significant.

Therefore, operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in substantial net deficit in the aquifer volume or lowering of the groundwater table. Impacts on groundwater during operation of the Project would be considered less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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;

Less Than Significant Impact. The Project Site's existing impervious area is approximately 95 percent of the Project Site. The majority portion of the existing runoff flows towards South San Vicente Boulevard, discharges into the existing catch basin located towards the middle of the Project Site. The rest of the stormwater flow into the existing catch basin located at the southern corner by South Sweetzer Avenue. The northeastern portion of the runoff flows into the alley, where it flows along a longitudinal gutter towards both Orange Street and South Sweetzer Avenue. The flow enters into a catch basin on South Sweetzer Avenue at the northeastern corner of the South San Vicente Boulevard and South Sweetzer Avenue intersection, or into a catch basin on Orange Street at the southeastern corner of the South San Vicente Boulevard and Orange Street intersection.

No streams are located within the Project vicinity. The Project would involve the demolition of existing structures, construction of new buildings, and installation of new landscaping, which would alter the existing drainage patterns on the Project Site. The Project Site would be most susceptible to erosion during the construction period when earthwork activities expose soils currently covered by impervious surfaces. However, as noted above, construction would be required to adhere to an erosion control plan prepared for the site as well as grading permit requirements which would reduce the potential for erosion or transport of siltation on- or off-site.

The existing Project Site runoff for a 50-year storm event is 2.37 cubic feet per second (cfs). After development of the Project, there would be no increase in stormwater runoff. Once constructed, the Project would implement BMPs including a capture and use systems and/or a biofiltration system to capture and treat first flush stormwater flows in accordance with the City's LID Ordinance and Standard Urban Stormwater Mitigation Plan. Compliance with the LID requirements would ensure that project design includes stormwater management features that provide post-construction BMPs to control pollutants associated with storm events and minimize the potential for any erosion or siltation. However, as mentioned above, the Project would not include substantial areas that could be susceptible to erosion. Regardless, the post-project condition would manage stormwater flow by capturing and reusing the water, and the overflow would be discharged to existing catch basins located on the adjacent public streets such that the potential for erosion or siltation on- or off-site would be less than significant. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. As discussed above, the Project Site is currently largely covered in impervious surfaces and implementation of the Project would result in a net decrease in impervious surfaces. There would be no alteration of any course of a stream or river. In addition, the required LID features that would be incorporated into the Project design would control stormwater runoff and result in a minor decrease in runoff. Thus, the peak stormwater flows would be virtually the same or less than existing conditions. Therefore, the post-construction condition would include drainage control features that would capture stormwater flows that could be reused on-site and would not result in flooding on- or off-site. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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. As discussed above, implementation of the Project would include LID requirements that would provide an ability to retain the first flush of stormwater flows on-site. As a result, anticipated volumes of stormwater discharges from the site would be expected to be less than currently occurs at the site under existing conditions. Existing drainage infrastructure has sufficient capacity to handle existing peak flows and therefore implementation of the Project generating equal peak flows would not exceed the capacity of the current system. The LID requirements would also provide pollutant controls in accordance with the City's Standard Urban Stormwater Mitigation Plan such that the potential for providing additional sources of polluted

runoff would be minimized. Therefore, the potential impacts related to capacity of existing or planned stormwater drainage systems or additional sources of polluted runoff would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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.³⁸ South San Vicente Boulevard, Wilshire Boulevard, Sweetzer Avenue, and Orange Street are within an area identified by FEMA to be subject to a 0.2 percent chance of annual flooding, which is equivalent to a 500-year recurrence interval. Regarding flood flows, the 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; and the Project Site is located in an urbanized area, would improve drainage flows with the net addition of landscaped area on-site, and – because of this – decrease the rate and volume of stormwater runoff. Thus, the Project would not impede or redirect floodwater flows and impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located in an area of relatively flat topography and urban development, with no enclosed bodies of water upstream of the Project Site, and as such, there is no potential for inundation resulting from a seiche or mudflows. Although the Los Angeles River is located approximately 5.3 miles north of the Project Site, the river in this area is located within a sunken concrete-lined channel at several feet below the ground elevation of the Project Site, and any seiches that could potentially develop within this stretch of the river during an earthquake would not have the potential to inundate the Project Site. With respect to tsunami hazards, the Project Site is located approximately eight miles inland (northeast) from the Pacific Ocean, and therefore would not be subject to a tsunami. Furthermore, the Project Site is not located on a City-designated tsunami hazard area. Therefore, there would be no risk of release of pollutants due to inundation of the Project Site and no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

³⁸ Federal Emergency Management Agency (FEMA), Flood Map for 656 San Vicente Boulevard, Los Angeles, CA. Available at: <https://msc.fema.gov/portal/search?AddressQuery=656%20San%20Vicente%2C%20Los%20Angeles#searchresultsanchor>. Accessed March 1, 2019.

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

Less Than Significant Impact. As specified above, the 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 Project would not adversely impact a groundwater management plan because the Project would be developed with BMPs to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. Operation of the Project would decrease the amount of impervious surface area on the Project Site from 95 percent under existing conditions to 92 percent after development is completed. Infiltration of stormwater would not occur or be permitted by the Regional Water Quality Control Board. As discussed above, the Project would comply with the City's LID requirements for infill development. It follows that neither construction nor operation on the Project Site are relevant to a water quality control or sustainable groundwater management plan. Therefore, the 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. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

No Impact. The Project Site is located within the Wilshire Community Plan area in the City of Los Angeles, and is entirely developed with educational and retail uses. The Project would be contained within the existing developed block bounded by Wilshire Boulevard to the south, South San Vicente Boulevard to the west, Orange Street to the north, and Sweetzer Avenue to the east. The Project would not encroach into adjacent streets or require vacations of streets or changes in the City's circulation system that would divide an established community. In addition, the Project is consistent and compatible with the immediately adjacent commercially zoned properties. Based on the above, the Project would not physically divide an established community and thus there would be no impact. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?

Potentially Significant Impact. The Project Site is located within the Wilshire Community Plan area, which designates the Project Site for Limited Commercial land uses. This land use designation corresponds with the zoning designation of C1-1VL-O. The existing designation allows for a Floor Area Ratio (FAR) of 1.5:1. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to a General Plan Amendment from Limited Commercial to Regional Center Commercial; Vesting Zone Change and Height District Change from C1-1VL-O to (Q) C2-2D-O to allow for a FAR of 4.5:1 and reduced parking; Site Plan Review for a project resulting in greater than 50,000 square feet of nonresidential floor area; a Vesting Tentative Tract Map (VTT- 74865) for the merger of seven (7) lots and re-subdivision of a 0.76-acre site into one (1) ground lot and one (1) airspace lot. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environment effect, an evaluation of the effects of the Project's requested entitlements, as well as an evaluation of the Project's compliance with other applicable regional and local plans, policies, and regulations, will be provided in the EIR.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?				

No Impact (a-b). According to the City of Los Angeles General Plan, the Project Site is not located in an area containing significant mineral deposits.³⁹ Furthermore, the Project Site is not designated as an existing mineral resource extraction area by the State of California or the U.S. Geological Survey.⁴⁰ However, the Project Site is located within the South Salt Lake Oil Field.⁴¹ As stated above in Section VIII, Hazards and Hazardous Materials, a review of DOGGR indicated that a historic buried and idle oil well had been located on the northeastern portion of the Project Site; however, the well never produced any oil and there is no evidence of oil production activities on the Project Site. The Project Site is currently fully developed with urban uses and, has not been the site of mineral resource extraction in the past, and rather than being designated for resource extraction, the Project Site is designated for Limited Commercial use. Therefore, Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts to mineral resources would occur and no mitigation measures are required. No further analysis of this topic in the EIR is required and no mitigation measures are required.

³⁹ City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.17_p1-35.pdf. Accessed June 28, 2017.

⁴⁰ California Geological Survey, Aggregate Sustainability in California, California, 2012, http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS_52_2012.pdf. Accessed June 28, 2017.

⁴¹ City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit E– Oil Fields and Oil Drilling Areas in the City of Los Angeles, <http://cityplanning.lacity.org/cwd/gnlpln/safetyelt.pdf>. Accessed June 28, 2017.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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 Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on an intermittent, short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, vehicles in the surface and subsurface parking levels, loading and unloading of trucks, and visitor activities on the Project Site. The Project may also increase vehicle traffic in the Project area over existing conditions, which may increase local noise levels. As such, nearby noise-sensitive uses, such as residential uses or hospital uses, could potentially be affected. Therefore, the EIR will provide further evaluation of the Project's potential to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of applicable standards.

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

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, construction of the Project may require pile-driving, which could involve repetitive, high impact methods that could create both groundborne noise and vibration. As such, the Project would have the potential to generate or to expose people to excessive groundborne vibration and noise levels during short-

term construction activities. Therefore, the EIR will provide further evaluation of construction-related, groundborne noise levels.

Once construction is complete, Project operation (i.e., medical office and retail-commercial), would not generate excessive groundborne vibration or groundborne noise. Minor vibration levels could be generated from mechanical rooftop equipment (i.e., HVAC equipment) and delivery trucks traveling on local roadways to and from the Project Site. However, vibration levels diminish rapidly with increasing distance from a vibration source and Project operation would not generate groundborne vibration or groundborne noise at levels beyond those which currently exist in an urbanized setting and would not have the potential to expose people to excessive groundborne vibration or groundborne noise, resulting in a less than significant impact. Therefore, no further analysis of operational groundborne vibration or groundborne noise in the EIR is required and no mitigation measures are required.

- 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. The Project Site is not located within an airport land use plan, is not within two miles of a public airport or public use airport, nor is it within the vicinity of a private airstrip. The closest airports to the Project Site are the Santa Monica Municipal Airport, located approximately 5.7 miles southwest of the Project Site, and LAX, located 8.7 miles southwest of the Project Site. Therefore, there would be no impacts to a private airstrip, a public airport, nor an airport land use plan. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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 Project Site is located within the jurisdiction of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under California Government Code Section 6502 et seq. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. In April 2016, SCAG's Regional Council adopted the 2016 RTP/SCS. The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. It also includes projections of population, households, and employment through 2040. Furthermore, the City's General Plan, including its community plans, address growth in the region.

The 2016 RTP/SCS reports demographic data for 2012, 2020, 2035 and 2040. The 2020, 2035, and 2040 projections apply the SCAG growth assumptions to the 2012 baselines as reported in the 2016 RTP/SCS.⁴² The 2016 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies. An estimate of the 2019 baseline population and growth projections for 2023 and 2040 are shown in **Table 2, Projected Population, Housing and Employment Estimates**.⁴³ As shown in Table 2, the Wilshire CPA and City of Los Angeles are projected to have population, housing and employment increases at the time of Project buildout (2023) and SCAG's Horizon Year (2040) compared to interpolated 2019 baseline conditions.

⁴² SCAG provides population, housing, and employment estimates forecasted for 2020, 2035, and 2040 for regional, county, and city/jurisdictional geographies. Data is available upon request and was provided to ESA.

⁴³ The 2019 baseline and 2023 buildout estimates were determined by interpolating from data presented in the SCAG projections.

Table 2
Projected Population, Housing and Employment Estimates

	Project Buildout Year – 2023				SCAG Projection Horizon - 2040		
	2019 Baseline	Projected	Total Growth	Percentage Increase	Projected	Total Growth	Percentage Increase
Population							
Wilshire Community Plan Area	295,786	305,686	9,901	3.35%	351,547	55,762	18.85%
City of Los Angeles	3,995,563	4,102,100	106,538	2.67%	4,609,414	613,852	15.36%
Housing							
Wilshire Community Plan Area	127,189	131,871	4,682	3.68%	151,104	23,915	18.8%
City of Los Angeles	1,426,913	1,940,420	49,988	3.5%	1,690,343	263,431	18.46%
Employment							
Wilshire Community Plan Area	168,307	170,778	4,521	2.69%	190,701	22,394	13.31%
City of Los Angeles	1,874,113	1,901,342	66,308	3.54%	2,169,114	295,002	15.74%

SOURCE: Based on SCAG data prepared for the 2016 RTP/SCS. Data was requested and received from the City of Los Angeles. The 2019 baseline estimate was determined by interpolating from data received. ESA, 2019.

The Project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, because the infill Project would utilize the existing transportation and utility infrastructure to serve the Project. As there are no proposed residential uses, the Project would only contribute to increasing the number of employees. The Project would provide approximately 145,305 square feet of floor area, including up to 140,305 square feet of medical office space and 5,000 square feet (4,000 square feet restaurant and 1,000 square feet retail) of ground floor retail-commercial uses. The Project's contribution to employment opportunities is summarized in **Table 3, Project Increases in Employment**. The projected Project increase in employment is compared to growth projections in SCAG's 2016 RTP/SCS for the Wilshire CPA and the City of Los Angeles in **Table 4, Project Employment Impacts**.

Project increases in employment therefore provide a small contribution to anticipated growth for the period between 2019 and 2023, the Project buildout year, for the Wilshire Community Plan area and the City as a whole. Therefore, the increase in growth is consistent with SCAG's growth projections. Impacts regarding consistency with the projections would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measure are necessary.

Table 3
Project Increases in Employment

Uses	Amounts	Employment Generation Factor (per sf) ^a	Number of Employees
Proposed Uses			
Medical Office	140,305 sf	0.00427	600
Restaurant ^b	4,000 sf	0.00271	11
Retail ^b	1,000 sf	0.00271	3
Proposed Gross			614
Existing Uses			
School ^{c,d}	5,738 sf	0.2247	26
Retail ^b	8,225 sf	0.00271	22
Existing Gross			48
Net Increase			566

sf = square feet

^a The employee generation factors the listed uses are taken from the Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

^b Restaurant and retail uses use the Neighborhood Shopping Center factor.

^c It is assumed that each student would require approximately 50 sf.

^d While the existing school building is currently vacant (as of October 2018), credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

SOURCE: ESA, 2019.

Table 4
Project Employment Impacts

	Project Increase ^a	SCAG Projected Growth ^b	Project Percentage of Growth
Employment			
<u>2019 - 2023 Buildout</u>			
Wilshire Community Plan Area	566	4,521	12.52%
City of Los Angeles	566	66,308	0.85%
<u>2019 - 2040 Projection Horizon</u>			
Wilshire Community Plan Area	566	22,394	2.53%
City of Los Angeles	566	295,002	0.19%

^a From Table 3, above.

^b From Table 2, above.

SOURCE: ESA, 2019. Based on SCAG 2016 RTP/SCS projections.

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

No Impact. The Project Site is currently developed with a 5,738-square-foot Montessori Children's World School located at 650 and 658 South San Vicente Boulevard, and an 8,225-square-foot Big 5 Sporting Goods store located at 6601 Wilshire Boulevard. There are currently no existing dwelling units located on the Project Site. As no housing would be displaced, the construction of replacement housing elsewhere would not be necessary. No impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

Potentially Significant Impact. The Los Angeles Fire Department (LAFD) provides fire protection and emergency medical services in the City of Los Angeles. The Project Site is located in the LAFD's South Bureau. The nearest stations to the Project Site are LAFD Station 58 at 1556 South Robertson Boulevard, located approximately 1.2 miles to the southwest of the Project Site, and Station 61 at 5821 West 3rd Street, located approximately 1.5 miles to the northeast of the Project Site. Fire Station No. 58 is the first-in station to calls for service at the Project Site.⁴⁴

As the Project would increase the developed floor area and height of buildings on the Project Site, it could increase demand on LAFD fire protection and emergency medical services and potentially affect demand on LAFD facilities which could result in the need for new or physically altered governmental facilities to maintain service. Therefore, the EIR will provide further evaluation of the Project's potential impacts on fire protection services.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in LAPD's West Bureau, which serves Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.⁴⁵

⁴⁴ Los Angeles Fire Department, Find Your Station, <http://www.lafd.org/fire-stations/find-your-station>. Accessed June 29, 2017.

⁴⁵ Los Angeles Police Department, About West Bureau, http://www.lapdonline.org/west_bureau/content_basic_view/1869. Accessed June 29, 2017.

Specifically, the Project Site is served by the Wilshire Community Police Station located at 4861 West Venice, approximately 2.1 miles southeast of the Project Site. Because the Project would increase the developed floor area and density on the Project Site, it could increase demand on LAPD police protection services and, potentially, demands on LAPD facilities, which could result in the need for new or physically altered governmental facilities to maintain acceptable service ratios or other performance objectives. Therefore, the EIR will provide further evaluation of the Project's potential impacts on police protection services.

c. Schools?

Less Than Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and specifically within LAUSD West Local District – Assembly District 50.^{46,47} The Project Site is within the attendance boundaries of Hancock Park Elementary, John Burroughs Middle School, and Fairfax Senior High.⁴⁸ These schools are currently operating on a single-track calendar, whereby instruction generally begins in mid-August and continues through early June.

LAUSD has established student generation rates for a variety of uses including residential development (multi-family) as well as other employment-generating uses (e.g. hotel, and commercial retail uses). An estimate of the number of students that could be indirectly generated by the Project's proposed medical office and retail-commercial uses is provided in **Table 5, *Estimated Number of Students to be Generated by the Project***. As shown in Table 5, the Project is estimated to generate six elementary school students, four middle school students, and five high school students for a total of 15 students. Project construction would create temporary construction jobs, but construction workers would be drawn from an existing work pool and would work at the Project Site for only short durations. Therefore, there would be no new student population associated with Project construction. As the Project contains no residential components, the Project's projected student generation is likely to be less than estimated in Table 5, which is based on LAUSD generation factors. The Project's medical office and retail-commercial uses would generate few, if any, students. For Project operation, if Project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. If employees with school-age children choose to move closer to the Project Site for work, or if new employees with school-age children are hired from the surrounding community or another city, there could be an increase in student population in the nearby schools of up to 15 students, although some might not attend public schools.

⁴⁶ Los Angeles Unified School District, Local Districts Map, June 2015, http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/34/LocalDistricts_LetterSize.png. Accessed June 29, 2017.

⁴⁷ Los Angeles Unified School District, State Assembly Districts, June 2015, <http://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22580&dataid=24321&FileName=AssemblyDistricts.pdf>. Accessed June 29, 2017.

⁴⁸ Los Angeles Unified School District, Resident School Identifier, <http://rsi.lausd.net/ResidentSchoolIdentifier/>. Accessed June 29, 2017.

Table 5
Estimated Number of Students to be Generated by the Project

Land Use ^a	Amount of Development	Elementary School	Middle School	High School	Total
Medical Office ^b	140,305 sf	4	2	3	9
Restaurant ^c	4,000 sf	1	1	1	3
Retail ^c	1,000 sf	1	1	1	3
Total		6	4	5	15^d

sf = square feet

^a Student Generation rates for nonresidential uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010.

^b The Office factor was used. For each 1,000 sf of Medical Office floor area – Elementary School = 0.0278; Middle School = 0.0139; High School = 0.0173.

^c The Retail and Services factor was used. For each 1,000 sf of Retail floor area – Elementary School = 0.0178; Middle School = 0.0089; High School = 0.0111.

^d Total number of students has been rounded up, in order to provide whole student number counts.

SOURCE: ESA, 2019.

To the extent that on-site development increases demand at LAUSD schools serving the Project Site, State law, including Government Code Section 65995 and Education Code Section 17620, requires the payment of fees at a specified rate for the funding of improvements and expansion to school facilities. Such fees are paid upon the issuance of building permits. In accordance with Senate Bill 50 (SB 50), enacted in 1998, the payment of this fee is deemed to provide full and complete mitigation for impacts to school facilities and impacts to schools would therefore be reduced to a less than significant level. No further analysis of this topic in the EIR is required and no mitigation measures are required.

d. Parks?

Less Than Significant Impact. At the state level, the Quimby Act, within the Subdivision Map Act, authorizes a city or county legislative body to require the dedication of land or to impose fees for park or recreational purposes as a condition of the approval of a tentative or parcel subdivision map, if specified requirements are met. In addition, the City includes a Parks Dedication and Fee Update ordinance (Ordinance 184,505) which ordinance requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units will be subject to the Park Fee unless they meet one of the exceptions listed in LAMC Section 12.33 C.3.

The Project does not include development of residential uses. As such, the Project would not result in new on-site residents who could directly utilize nearby park facilities and development of the Project would generate minimal demand for existing parks and recreational facilities. However, a small percentage of new visitors and employees to the Project Site might visit nearby parks and generate some degree of increased demand on existing public recreational and park facilities. The Project would provide outdoor landscaped decks on Floors 6 through 10. The Project would provide a total of approximately 4,643 square feet of open space combined across

the Project Site. In particular, the ground floor would include 815 square feet of associated outdoor dining. In addition, Floors 6 through 10 would include small terraced landscaped patios that would be provided overlooking South San Vicente Boulevard that would be exclusively used by the building tenants. In particular, Floor 6 would include 1,864 square feet of open space, Floor 7 would include 328 square feet of open space, Floor 8 would include 570 square feet of open space, Floor 9 would include 533 square feet of open space, and Floor 10 would include 533 square feet of open space. These facilities would reduce the Project's limited demand for use of existing public recreational and park facilities. Additionally, as the Project includes approval of a Vesting Tentative Tract map, the Project would pay required Quimby Fees. Therefore, there would be a less than significant impact on park services in the Project area. No further analysis of this topic in the EIR is required and no mitigation measures are required.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. Because the Project would introduce new visitors and employees to the Project Site, demand on LAPL library services could increase. The nearest LAPL library to the Project Site is the Fairfax Branch Library located at 161 South Gardner Street (1.2 miles northeast of the Project Site). In addition, the Project Site is located 1.3 miles from the West Hollywood Public Library and 1.60 miles from the Beverly Hills Public Library. The second closest LAPL library to the Project Site is the Robertson Branch Library located at 1719 South Robertson Boulevard (1.4 miles southwest of the Project Site). As there is no residential component to the Project, the only potential new library visitors, if any, would be visitors or employees to the Project Site. The addition of 566 new employees to the Project Site would not materially change demand on local libraries. Therefore, there would be a less-than-significant impact associated with library services.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project residents would use the existing road network, without the need for new roadways to serve the Project Site. As discussed in response to Checklist Question XVII.a, the Project could result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Any minor roadway improvements (e.g., street dedications), pursuant to City requirements, would be constructed concurrent with the Project. Therefore, the Project would result in less than significant impacts on other governmental services. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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?**

Less Than Significant Impact. As discussed in the response to Checklist Question XV.d, the Project does not include development of residential uses. As such, the Project would not result in new on-site residents who could directly utilize nearby recreational facilities and development of the Project. However, because the Project would introduce new visitors and employees to the Project Site, greater demand on existing public recreational facilities and services could be generated. The Project would include 3,828 square feet of outdoor landscaped areas on Floors 6 through 10. In addition, as the Project includes approval of a tentative tract map, the Project would pay required Quimby Fees.

Based on the above, the Project would not cause or accelerate the deterioration of regional or neighborhood parks and recreational facilities. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

No Impact. The Project does not include recreational facilities or require the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in response to Checklist Question XV.d. In addition, as the Project includes approval of a Vesting Tentative Tract map, the Project would pay required Quimby Fees. Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

XVII. TRANSPORTATION

	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.63, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would develop the Project Site with 140,305 square feet of medical office and 5,000 square feet of retail-commercial uses, resulting in a total of 145,305 square feet of developed floor area. As construction and operation of the project could affect the circulation system, including roadway, bicycle, and pedestrian facilities, further analysis of this topic, including mass transit and non-motorized travel, will be provided in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.63, subdivision (b)?

Potentially Significant Impact. Consistency with CEQA Guidelines Section 15064.3, Subdivision (b) relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impacts. In July 2019, LADOT adopted guidelines which set new significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with this checklist threshold question. The Project would develop the Project Site with 140,305 square feet of medical office and 5,000 square feet of retail-commercial uses, resulting in a total of 145,305 square feet of developed floor area. Operation of the project would generate trips that would generate per capita VMT. Therefore, further analysis of this topic will be provided in 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)?

Less Than Significant Impact. The Project would not alter existing street patterns in the vicinity. There are no existing hazardous design features such as sharp curves or dangerous intersections on site or within the Project vicinity. However, the Project would result in some modifications to access (i.e., new curb cuts for the Project driveway). As discussed under Section 3, Project Description, of this Initial Study, vehicle access to the parking levels (Floors 2 through 5) would be provided from a driveway on Orange Street. A loading dock serving the office and retail-commercial uses would be located and accessed from a separate driveway on Orange Street. A visitor drop-off and valet area would be accessible from the South San Vicente Boulevard entrance to accommodate a parking queue and ride-share drop-off area from a southern and northern driveway providing ingress and egress to the Project Site, respectively. All on-site roadway and site access improvements would be designed in compliance with applicable City standards. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

d. Result in inadequate emergency access?

Less Than Significant Impact. Immediate vehicular access to the Project Site is provided by Wilshire Boulevard, South San Vicente Boulevard, Orange Street, and Sweetzer Avenue. As discussed above in response to Checklist Question IX.f, the Project Site is located in an established urban area that is well served by an existing road network. As shown in the City of Los Angeles Safety Element, South San Vicente Boulevard and Wilshire Boulevard, which are located directly adjacent to the Project Site, west and south of the Project Site, respectively, are Selected Disaster Routes that could be utilized during a disaster event.⁴⁹ While it is expected that the majority of construction activities for the Project would be confined on site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

With regard to operation, development of the Project would result in an increase to traffic on South San Vicente Boulevard and Wilshire Boulevard in the vicinity of the Project Site. However, the Project would maintain emergency access to and from the Project Site and in the surrounding area, provided that future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents; and Project Site access and circulation plans would be subject to review and approval by the LAFD and LADOT, to ensure that access to the Project does not interfere with existing disaster routes.

Based on the above, the Project would not result in inadequate emergency access. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁴⁹ City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles, <http://cityplanning.lacity.org/cwd/gnlpn/safteyelt.pdf>. Accessed July 3, 2017.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 (a-b). Approved by Governor Brown on September 25, 2014, Assembly Bill (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. Any information gained during the consultation process will be used to analyze impacts to tribal cultural resources in the EIR. The existence of tribal cultural resources on the Project Site is currently unknown; as such, further analysis of this topic will be provided in the EIR to determine the potential for, and significance of, the Project's impacts on tribal cultural resources.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The utilities and service systems discussion is based, in part, on the *Utility Technical Report: Water, Wastewater* (Utility Report), prepared by KPFF Consulting Engineers on July 9, 2019. The report is included as Appendix D of this Initial Study.

- 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?**

Water

Less Than Significant Impact. Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other construction activities. A conservative estimate of construction water demand would be

approximately 1,000-2,000 gallons per day (gpd). As discussed in the Utility Report, the existing water demand at the Project Site is approximately 386 gpd. The construction water demand could be more than double the existing water demand, however, this estimated construction-period demand is significantly less than the Project's estimated operational demand, which as described below, can be accommodated by the existing infrastructure. Correspondence from the LADWP and the City of Los Angeles, Department of Public Works, Bureau of Sanitation (BOS) indicate there is adequate water supply, and sufficient water infrastructure to meet the temporary water demand associated with construction of the Project, as provided in Appendix D of this Initial Study. Therefore, the potential impacts on water use and associated infrastructure due to construction activity will be less than significant.

The Project would require the construction of new on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below the surface. Installation of new water infrastructure will be limited to on-site water distribution and minor off-site work associated with connections to the public main. No upgrades to public water mains are anticipated. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. The Project would not require or result in the construction of new water or wastewater treatment facilities, or expansion of existing facilities, the construction of which would cause significant environmental effects.

As shown in **Table 6, *Estimated Water Demand and Sewage Generation***, the Project would result in an increased water demand compared to existing conditions. The existing water demand is 386 gpd which would increase to 43,136 gpd during operation of the Project, resulting in a net increase of 42,750 gpd. The anticipated water demand for the Project is based on the Sewer Capacity Availability Report (SCAR) and LA Sanitation's Sewerage Facilities Charge Sewage Generation Factors for Residential and Commercial Categories, as provided in Appendix D of this Initial Study.

Based on fire flow standards set forth in Section 57.507.3 of the LAMC and input received from the LAFD, provided in Appendix D of this Initial Study, the Project falls within the Office Building/Non-Residential category, and the required Fire Flow will be set at 6,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi). This translates to a required flow of 1,500 gpm for each of four hydrants, or 1,000 gpm for each of six hydrants flowing simultaneously. An Information of Fire Flow Availability Request (IFFAR) were submitted to LADWP to confirm adequate fire flow pressure for the Project from the existing infrastructure. LADWP indicated in the IFFAR results, provided in Appendix D of this Initial Study, that the existing public water system can supply 6,300 gpm from six hydrants flowing simultaneously, with a residual pressure greater than 20 psi. Further coordination with LADWP and LAFD would be held during the design phase of the Project to meet the full range of the fire flow requirements.

Table 6
Estimated Proposed Water Demand and Sewage Generation

Land Use	Units	Generation Rate (gpd/unit) ^a	Total Water Demand/Sewage Generation (gpd)
Existing			
Elementary School ^b	20 students	9/ student	180
Retail Store	8,225 sf	25/ 1,000 sf	206
Proposed			
Medical Office	140,305 sf	250/ 1,000 sf	35,076
Retail	1,000 sf	50/ 1,000 sf	50
Restaurant	267 seats ^c	30/ seat	8,010
Subtotal Proposed			43,136
Net Increase			42,750

sf = square feet

^a The average daily flow based on sewerage generation rates provided by LA Sanitation (2012) and assumes that water consumption and wastewater generation are equivalent.

^b While the existing school building is currently vacant (as of October 2018), credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

^c The Project will not exceed 267 seats for a full service restaurant with indoor and outdoor seating.

SOURCE: KPFF Consulting Engineers, 2019.

The Project would also incorporate a fire sprinkler suppression system, which would be subject to fire department review and approval of the design and permitting of the Project. As noted, a Fire Service Advisory Request (SAR) was submitted to LADWP in order to ensure the existing infrastructure could meet the demands of the Project. The SAR shows a static pressure of 47 pounds per square inch and that a flow of up to 2,500 gpm can be delivered to the Project Site with a residual pressure of 79 pounds per square inch, which exceeds the 20 pounds per square inch requirement for the surrounding public hydrants. The California Urban Water Management Planning Act requires that every urban water supplier prepare and adopt an Urban Water Management Plan (UWMP) every five years. LADWP's 2015 UWMP provides a complete analysis of the water supplies and demands and projects a sustainable water supply for the City for the next 25 years. LADWP approved the SAR, based in part, on the fact that the Project water demand falls within the LADWP's 2015 UWMP's projected increase in citywide water demands while anticipating multi-dry year water conditions occurring at the same time.

As shown in the SAR, IFFAR, and through compliance with LAFD and LADWP requirements, the impact of the Project to the water infrastructure would be less than significant.

Therefore, the Project potential impacts on water supply and infrastructure would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

Wastewater

Less Than Significant Impact. The following discussion is based on *The 656 South San Vicente Boulevard Utility Technical Report: Water, Wastewater* (Utility Report), prepared by KPFF Consulting Engineers on July 9, 2019 and included as Appendix D of this Initial Study.

The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the Regional Water Quality Control Board. Therefore, implementation of the Project would not result in an exceedance of wastewater treatment requirements.

Construction activities associated for the Project would result in a slight increase in wastewater generation because construction workers and activities would generate a slight increase in wastewater compared to the existing educational and retail uses. Wastewater generation would occur incrementally throughout the construction of the Project; however, such use would be temporary. In addition, construction workers would typically utilize portable restrooms that would not contribute to wastewater flows to the City's wastewater system. The Project would require construction of new on-site infrastructure to serve the new buildings and minor upgrades and/or relocation of existing infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. The Project would not require or result in the construction of new water or wastewater treatment facilities, or expansion of existing facilities, the construction of which would cause significant environmental effects.

Overall, construction related impacts on wastewater generation and infrastructure are minor and anticipated to be less than the existing use. Therefore, impacts on wastewater associated with construction activities would be less than significant.

BOS provides wastewater services for the Project Site. Any wastewater generated at the Project Site is treated at the Hyperion Treatment Plant. The Hyperion Treatment Plant is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant and the Los Angeles-Glendale Water Reclamation Plant. The existing design capacity of the Hyperion Treatment Plant is approximately 450 mgd. Currently, approximately 275 mgd is treated at the Hyperion Treatment Plant resulting in residual treatment capacity of approximately 175 mgd.⁵⁰ The discharge of effluent from the Hyperion Treatment Plant into Santa Monica Bay is regulated by the Hyperion Treatment Plant's NPDES Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use. The BOS, Wastewater Engineering Division performed a sewer capacity analysis of the local and regional sewer conditions to determine if available wastewater conveyance and treatment capacity exist for future development.⁵¹

As shown in Table 6, the Project would result in new sources of wastewater generated at the Project Site and substantially increase wastewater flow from an existing 386 gallons per day (gpd) to 43,136 gpd under proposed conditions, a net increase of 42,750 gpd. However, the increase in the quantity of wastewater generated by the Project is well within the capacity of the Hyperion Treatment Plant. The plant has a design capacity of 450 million gallons per day (mgd) and

⁵⁰ KPFF Consulting Engineers, *656 South San Vicente Boulevard Utility Technical Report: Water, Wastewater*, July 9, 2019.

⁵¹ KPFF Consulting Engineers, *656 South San Vicente Boulevard Utility Technical Report: Water, Wastewater*, July 9, 2019.

currently operates at approximately 275 mgd with a residual treatment capacity of 175 mgd. Therefore, the proposed increase of 42,750 gpd or 0.0428 mgd would be equal to 0.0244 percent of the Hyperion Treatment Plant treatment capacity and would be within the treatment plant's available capacity.⁵²

A SCAR was approved by BOS and the SCAR determined that the existing public sewer infrastructure can accommodate the Project. BOS analyzed the Project demands in conjunction with existing conditions and forecasted growth and verified that there is sufficient capacity in the existing sewer system for the Project to discharge to the municipal system. Therefore, the Project would not require or result in the construction of new waste water facilities, or expansion of existing facilities, the construction of which would cause significant environmental effects.

Also, as stated above, the existing Hyperion Treatment Plant has sufficient treatment capacity to accommodate the proposed increase in wastewater flows that would occur with the Project.⁵³ Therefore, Project wastewater generation impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

Stormwater

Less than Significant Impact. Under existing conditions, the Project Site is completely developed. Current drainage flows on the Project Site are collected in the City's existing curb and gutter drainage system. The potential construction impacts associated with the drainage facilities would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

Electric Power and Telecommunications Facilities

Less than Significant Impact. The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electrical power, natural gas, and telecommunications services. As described above, with respect to Project operations, the Project would obtain energy from the LADWP, which has committed to diversify its portfolio of energy sources to achieved 35 percent renewables by 2020. In addition, natural gas would be supplied by SoCalGas. Furthermore, the Project would be designed and constructed to meet the LAGBC standards, where applicable. The Project would include ENERGY STAR-rated appliances and install energy efficient boilers, heaters and air conditioning systems. Therefore, the Project's energy demand would be minimal with respect to LADWP and SoCalGas supplies and would not impact the capacity of existing utility facilities. As such, in the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical, natural gas, or telecommunications services. New connections would be established for the Project; however, no substantial electrical, natural gas, or telecommunications infrastructure is present on or adjacent to the Project Site that would need to be relocated to accommodate the Project. Impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁵² KPFF Consulting Engineers, 656 South San Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019.

⁵³ KPFF Consulting Engineers, 656 South San Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019.

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

Less Than Significant Impact. The Project would increase water demand compared to existing conditions. The Project would not meet the definition of a “project” under Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) such that the preparation of a Water Supply Assessment demonstrating sufficient water supplies is not required. However, as stated above, the Utility Report, prepared for the Project, demonstrated that the existing 2015 UWMP could accommodate the proposed increase in water demand. This includes the improvements that were determined necessary for the Project to meet fire flow requirements in accordance with Section 57.507 of the LAMC. Therefore, no new or expanded entitlements would be needed to meet the proposed increase in water demand and the potential impact would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

- 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?**

Less Than Significant Impact. As stated above, the Hyperion Treatment Plant has sufficient capacity to accommodate the net increase in wastewater flow that would be associated with implementation of the project. Therefore, the potential impact related to wastewater treatment plant capacity is less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. BOS is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at in-County landfills.

According to the County of Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2017 Annual Report, remaining disposal capacity for the County’s Class III landfills is estimated at approximately 168 million tons as of December 2017.⁵⁴ The average daily disposal capacity is 22,549 tons per day and the average daily disposal rate is 16,062 tons per day, leaving a residual daily capacity of 6,487 tons per day. Waste from the City of Los Angeles is disposed at primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 168 million tons of remaining

⁵⁴ County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2017 Annual Report. April 2019. Appendix E-2, Table 1, <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>. Accessed July 9, 2019.

capacity within the County, 68.04 million tons or approximately 41 percent, is located at the Sunshine Canyon landfill, which has a remaining life of 22 years.⁵⁵

In addition to in-County landfills, out-of-County disposal facilities may also be available to the City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills. The County's CoIWMP 2017 anticipates that future Class III disposal needs can be adequately met through 2032 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

The Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, identifies a long term plan through 2030 for the City's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities.⁵⁶

Construction

Project construction would require earthwork (grading and excavation) and the new construction of a mixed-use building on the Project Site. Each of these activities would generate demolition waste including but not limited to soil, asphalt, wood, paper, glass, plastic, and metals. As shown in **Table 7, Project Demolition and Construction Debris**, demolition of the existing buildings and construction of the Project would generate an estimated 962 tons of debris. Total cut and fill would be approximately 9,000 cubic yards. As such, the solid waste generated by the Project would account for less than 0.002 percent of the County's available regional landfills

Construction and demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this regulation, all private waste haulers collecting solid waste within the City, including construction and demolition (C&D) waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 94 percent.

As construction waste would not exceed the capacity of existing disposal facilities and would be further reduced by recycling, impacts would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁵⁵ County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2017 Annual Report. April 2019. Appendix E-2, Table 1, <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>. Accessed July 9, 2019.

⁵⁶ Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwswirp.jsessionid=AgloE85QVAFQnxqPpAdm65Tc-m75Je2g-nC1LEy8UCT1VM7ILo!-395322140!-1871668233?_afLoop=11115782988512864&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D11115782988512864%26_afWindowMode%3D0%26_adf.ctrl-state%3Dgm4tpb8fc_4. Accessed July 2019.

Table 7
Project Demolition and Construction Debris

Land Use	Size	Generation Rate	Total Solid Waste Generation
Demolition^a			
School	5,738 sf	0.046 tons per sf	266 tons
Retail	8,225 sf	0.046 tons per sf	381 tons
Construction^b			
Medical Office	140,305 sf	4.34 lbs per sf	608,924 lbs / 304 tons
Restaurant	4,000 sf	4.34 lbs per sf	17,360 lbs / 9 tons
Retail	1,000 sf	4.34 lbs per sf	4,340 lbs / 2 tons
Total Solid Waste Generated During Project Construction			315 tons
Total Solid Waste Generated During Demolition and Construction			962 tons
Soil Export (cubic yards)			9,000 cy

sf = square feet

cy = cubic yards

^a One square foot represents 0.046 ton of waste material. CalEEMod User's Guide, Appendix A, p. 12, July 2013.

^b Generation factor obtained from U.S. EPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003, Page 10.

SOURCE: ESA, 2019.

Operation

Estimated operational solid waste generation for the Project is shown in **Table 8, Estimated Operational Solid Waste Generation**. It is estimated that the net total waste generation for the Project would be approximately 179 tons per year, or 0.48 tons per day. The daily amount of solid waste generated by the Project would represent a negligible amount (less than 0.1 percent) of the daily solid waste disposed of by the County (16,062 tons). It is important to note that this estimate is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast. The Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities.⁵⁷ Waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025.

⁵⁷ Los Angeles Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, <https://www.lacitysan.org/san/sandocview?docname=cnt012522>. Accessed June 29, 2017.

Table 8
Estimated Operational Solid Waste Generation

Land Use	Size	Generation Rate (lbs/unit/day) ^a	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Existing Land Uses				
School ^b	5,738 sf	1 lb/student/day ^c	115 lbs	21 tons
Retail	8,225 sf	2.5 lbs/1,000 sf/day	21 lbs	4 tons
		Total Existing	135 lbs	25 tons
Proposed Land Uses				
Medical Office ^d	140,305 sf	6 lbs/1,000 sf/day	842 lbs	154 tons
Restaurant	4,000 sf (267 seats)	1 lb/seat/day	267 lbs	49 tons ^e
Retail	1,000 sf	2.5 lbs/1,000 sf/day	2.5 lbs	1 tons
		Total Proposed	1,111 lbs	203 tons
		Net Increase	976 lbs	179 tons

sf = square feet

^a Generation factors provided by the CalRecycle website: *Estimated Solid Waste Generation Rates*. <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed June 29, 2017.

^b While the existing school building is currently vacant (as of October 2018), credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

^c It is assumed that each student would require approximately 50 sf.

^d Medical Office use the Office generation factor.

^e Conservative assumption using the greater generation rate for restaurant uses.

SOURCE: ESA, 2019

As described in the ColWMP 2017 Annual Report, future disposal needs for the 15-year planning horizon (2030) would be adequately met through the use of in-County and out-of-County facilities. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity.

Based on the above, Project-generated waste would not exacerbate the estimated landfill capacity requirements addressed for the 15-year planning period ending in 2030, or alter the ability of the County to address landfill needs via existing capacity and other options for increasing capacity. Therefore, impacts on solid waste disposal from Project operations would be less than significant.

In summary, the County's inert and Class III landfills would have adequate capacity to accommodate Project-generated construction and demolition waste during Project construction and Class III solid waste generation during Project operations. Thus, construction and operation impacts relative to solid waste would be less than significant. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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

Less Than Significant Impact. All local governments, including the City of Los Angeles, are required under AB 939 to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. In addition, the City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The Zero Waste Plan aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g. adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multi-family and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities new policies and programs, and the development of future recycling facilities.⁵⁸

As discussed in response to Checklist Question IX.a, operation of the medical office and retail-commercial uses would involve the use of medical (biohazardous) waste such as needles, used bandages, and IV catheters. These medical (biohazardous) waste materials are subject to regulation under the Medical Waste Management Act. The Medical Waste Management Act, part of the California Health and Safety Code 117600-118360, was adopted by the state legislature in 1990 and regulates the generation, handling, storage, treatment and disposal of medical waste. The Medical Waste Management Program ensures protection of public health and safety and the environment, through the implementation and enforcement of regulations that apply to the handling, storage, treatment, and disposal of biohazardous waste. In Los Angeles County, the California Department of Public Health is the local enforcement agency for the Medical Waste Management Act.

The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. All potentially hazardous materials generated from the medical office would be disposed of in compliance with the applicable regulations in accordance with a Hazardous Materials Management Plan which would be required for the proposed facility. The Project does not include any component that would conflict with State or local laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Therefore, impacts would be less than significant regarding compliance with AB 939, the Zero Waste Plan, and the Medical Waste Management Act . No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁵⁸ Los Angeles Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, <https://www.lacitysan.org/san/sandocview?docname=cnt012522>. Accessed June 29, 2017.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. The Project Site is located in an urbanized area with no natural vegetation. The Project Site is presently developed with a Montessori Children's World School, and a Big 5 Sporting Goods store. Surface parking associated with these uses is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north. Additional surface parking is located in the middle of the Project Site between the two buildings. A small number of parking space are also located to the rear of the Big 5 Sporting Goods store fronting the alley. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.⁵⁹ In addition, as discussed under response to Checklist Question IX.f, above, the Project would not cause an impediment along the City's designated emergency evacuation route or disaster route; thus, the proposed medical office and retail-commercial uses would not impair implementation of the City's

⁵⁹ 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 February 2019.

emergency response plan. Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?

No Impact. The Project Site is located in an urbanized area with no natural vegetation. The Project Site is presently developed with a Montessori Children's World School, and a Big 5 Sporting Goods store. Surface parking associated with these uses is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north. Additional surface parking is located in the middle of the Project Site between the two buildings. A small number of parking space are also located to the rear of the Big 5 Sporting Goods store fronting the alley. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.⁶⁰ In addition, as discussed under response to Checklist Question VII.a.iv, above, the Project Site is relatively flat as it has an elevation of 147 feet on the northern corner of the Project Site and an elevation of 137 feet on the southern corner of the Project Site. The Project Site is also not within a High Winds Velocity Area, as mapped by the City of Los Angeles.⁶¹ Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

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?

No Impact. The Project Site is located in an urbanized area with no natural vegetation. The Project Site is presently developed with a Montessori Children's World School, and a Big 5 Sporting Goods store. Surface parking associated with these uses is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north. Additional surface parking is located in the middle of the Project Site between the two buildings. A small number of parking space are also located to the rear of the Big 5 Sporting Goods store fronting the alley. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.⁶² In addition, the Project does not propose installation or maintenance of associated structures that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment. Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁶⁰ 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 February 2019.

⁶¹ 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 February 2019.

⁶² 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 February 2019.

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?

No Impact. The Project Site is located in an urbanized area with no natural vegetation. The Project Site is presently developed with a Montessori Children's World School, and a Big 5 Sporting Goods store. Surface parking associated with these uses is located on the eastern portion of the Project Site, fronting South San Vicente Boulevard, South Sweetzer Avenue and the alley to the north. Additional surface parking is located in the middle of the Project Site between the two buildings. A small number of parking space are also located to the rear of the Big 5 Sporting Goods store fronting the alley. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.⁶³ In addition, as discussed under response to Checklist Question VII.a.iv, above, the Project Site has an elevation of 147 feet on the northern corner of the Project Site and an elevation of 137 feet on the southern corner of the Project Site. As such, downslope or downstream flooding or landslides would not occur on the Project Site. Therefore, no impact would occur. No further analysis of this topic in the EIR is required and no mitigation measures are required.

⁶³ 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 February 2019.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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. The Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. With regard to potential construction impacts on protected nesting birds, consistency with provisions in the MBTA would avoid disturbance of nest birds and would protect nesting birds if they are present on-site during construction. In addition, the Project would adhere to existing regulatory requirements that would ensure impacts related to human remains are less than significant.

However, as discussed in this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of the environment as addressed herein. Potentially affected resources include Air Quality, Cultural Resources (with regard to historical and

archaeological resources), Geology and Soils (with regard to liquefaction, unstable geologic units, expansive soils, and paleontological resources), Greenhouse Gas Emissions, Land Use and Planning, Noise, Public Services (with regard to fire protection and police protection), Transportation, and Tribal Cultural Resources. An EIR will be prepared to analyze and document these potentially significant impacts.

Based on the above, no further analysis of biological resources or cultural resources in the EIR is required.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given Project are combined with the impacts of related projects in proximity to the Project Site that would create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts. Topics for which Initial Study determinations were “No Impact”, “Less Than Significant Impact”, or “Less Than Significant with Mitigation” have been determined not to have the potential for significant cumulative impacts.

As analyzed above, the Project cannot have a significant impact on aesthetic resources pursuant to PRC Section 21099(d)(1) and ZI No. 2452. In addition, related projects would be reviewed on a case-by-case basis by the City to comply with the LAMC requirements regarding building heights, setbacks, massing, and lighting, or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Therefore, Project impacts associated with aesthetics would not be cumulative considerable and would be less than significant.

With respect to potential contributions to cumulative impacts for agricultural resources, biological resources, cultural resources, and mineral resources, the Project Site is located in an urbanized area, and like the Project, other development occurring in the area would also constitute urban infill in already densely developed areas. Thus, the Project is unlikely to combine with related projects or other cumulative growth to result in significant cumulative impacts with respect to agricultural and mineral resources. With respect to biological resources, the Project would be consistent with the MBTA, as stated under response to response to Checklist Question IV.d, which would ensure that potential impacts to nesting birds would be reduced to a less than significant level. Impacts to sensitive plant and animal species would not be cumulatively considerable, as no such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Biological resources are generally site-specific and need to be evaluated within the context of each individual project. With regard to cultural resources as it relates to human remains, the Project would be required to comply with existing regulatory requirements that would ensure impacts related to human remains are less than significant.

Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects.

Due to their site-specific nature, impacts related to geology and soils are typically assessed on a project-by-project basis for a particular localized area. As with the Project, related projects would address site-specific geologic hazards through implementation of site-specific geotechnical recommendations and/or mitigation measures. Related projects would also be subject to local, state, and federal regulations and standards for seismic safety.

Due to their site-specific nature, hazards and hazardous materials are typically assessed on a project-by-project basis. As with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. Related projects would be subject to local, state, and federal regulations pertaining to hazards and hazardous materials.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to near-by water bodies. However, related projects would be subject to the City's LID requirements and would also be subject to NPDES requirements related to construction and discharges from dewatering operations. It is anticipated that related projects would also be evaluated on an individual basis by the City to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and water quality.

As the Project is a medical office/ retail-commercial project that would replace existing commercial uses, the Project would not be anticipated to induce substantial unplanned population growth, displace substantial numbers of existing people or housing, or contribute to a cumulative demand for schools, parks, recreation facilities, and libraries.

With regard to transportation as it relates to hazardous design, on-site roadway and site access improvements for related projects, as with the Project, would be designed in compliance with applicable City standards. In addition, all emergency access. As it related to emergency access, related projects would develop a Construction Management Plan, similar to the Project, to ensure that adequate emergency access is maintained during construction and during operation, access and circulation plans would be subject to review and approval by the LAFD and LADOT, to ensure that access to the Project does not interfere with existing disaster routes.

With regard to water and wastewater, due to shared urban infrastructure, the Project and related projects would cumulatively increase water consumption and wastewater generation. As discussed above, the Project water demand falls within the LADWP's 2015 UWMP's projected increase in citywide water demands and would be able to supply the demands of the Project and related projects through 2040 and beyond. The City's Green Building Ordinance would also require related projects to implement water conservation measures which would serve to reduce water use. In addition, the Hyperion Treatment Plant has a design capacity of 450 mgd and currently operates at approximately 275 mgd with a residual treatment capacity of 175 mgd. Therefore, the existing Hyperion Treatment Plant has sufficient treatment capacity to accommodate the proposed increase in wastewater flows that would occur with the Project and it is anticipated that the Hyperion Treatment Plant could treat future wastewater generation of the related projects. The City would continue to monitor wastewater flows and update wastewater infrastructure, as necessary, to accommodate growth in the City. New development projects would be required to coordinate with the City via a SCAR to determine adequate sewer capacity.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during construction and operation. However, it is anticipated that related projects would represent a minor percentage of the remaining capacity of the County's landfills open to the City, similar to the Project. As discussed above, the County's ColWMP 2017 anticipates that future Class III disposal needs can be adequately met through 2032 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices. In addition, the City has a future goal to achieve zero waste by 2030, which would in turn slow the declining landfill capacity at County landfills open to the City.

The Project would have a less than significant impact related to emissions of odors. It is anticipated that the related projects in the surrounding area would not be uses associated with major odor producing uses such as manufacturing, smelting, food packaging, and other industrial uses. Impacts regarding physically dividing a community is site specific, and because the Project would have no impact on this issue, there would be no potential for cumulative impacts. Because the Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use area, any cumulative impacts with regard to exposing people residing or working in the Project area to excessive noise levels would be less than significant.

Based on the above, Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts for the environmental topics discussed above. No further discussion of potential cumulative effects for these topics in the EIR is required.

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

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in potentially significant environmental impacts associated with Air Quality, Energy, Greenhouse Gas Emissions, Land Use and Planning, Noise, Public Services (with regard to fire protection and police protection), Transportation, and Tribal Cultural Resources. These impacts could have potentially adverse effects on human beings, and the EIR will provide further analysis of these potential impacts.