



## The Albany Project

Case Number: ENV-2018-3456-EIR

**Project Location:** 1330 W. Pico Boulevard and 1308-1348 S. Albany Street, Los Angeles, California 90015

**Additional Locations for the Proposed Sign District:** 1315 W. 14th Street and 1350, 1356 S. Albany Street (adjacent church and single-family home)

**Community Plan Area:** Westlake

**Council District:** 1 – Cedillo

**Project Description:** The Project involves the demolition of an approximately 150,257-square-foot, three-story office building (which has been vacant since 2016) with rooftop and surface parking located on an 114,132-gross-square-foot (2.62-acre) rectangular-shaped site and the construction of a 37-story (480-foot-tall building), 722,005-square-foot (6.45:1 FAR), mixed-use development with a five-level podium and a tower located on the north side of the Project Site. The development would include a 730-guest room hotel, 63,356 square feet of conference space, 5,405 square feet of office (hotel administration) space, 19,665 square feet of restaurant and bar use, and 9,325 square feet of spa/fitness space. Parking would be provided within four subterranean parking levels (approximately 43 feet in depth). The Project would provide short-term and long-term bicycle parking spaces located adjacent to the public right-of-way on Pico Boulevard and Albany Street and within the proposed parking levels. The Project would include the excavation and export of 168,400 cubic yards of soil from the Project Site. A City-initiated sign district would also be implemented on the Project Site and the adjacent single-family home (1350 Albany) and church (1356 Albany Street and 1315 14th Street) sites that make up the full city block. No other change would be made to the residential use or church. The Project also would include a comprehensive signage program. The Project includes a boundary change to the Pico - Union Historic Preservation Overlay Zone to remove a portion of the site from the district.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

CAJA Environmental Services  
15350 Sherman Way, Suite 315, Van Nuys, CA 91406

**APPLICANT:**

1330 W Pico Blvd Group, LLC  
14724 Ventura Boulevard, Penthouse, Los Angeles, CA 91404

# INITIAL STUDY

## 1 INTRODUCTION

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

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA, 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 IS, 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 IS (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

### 1.1 PURPOSE OF AN INITIAL STUDY

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

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

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<sup>1</sup> 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

## 1.2 ORGANIZATION OF THE INITIAL STUDY

This IS is organized into sections as follows:

### 1. INTRODUCTION

Describes the purpose and content of the IS 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

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://resources.ca.gov/ceqa>).

### 1.3.1 Initial Study

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

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and IS 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 (DEIR) and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

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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.

### **1.3.2 Draft EIR**

Once the DEIR 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 DEIR 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 DEIR and comment on 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 comments on environmental issues received during the comment period are prepared.

### **1.3.3 Final EIR**

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

The decision-making body then consider 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 program.

# INITIAL STUDY

## 2 EXECUTIVE SUMMARY

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<b>PROJECT TITLE</b>	<b>THE ALBANY PROJECT</b>
ENVIRONMENTAL CASE NO.	ENV-2018-3456-EIR
RELATED CASES	CPC-2018-3454-GPA-VZC-HD-MCUP-CUX-CCMP-SPR; VTT-82122-CN

<b>PROJECT LOCATION</b>	<b>1330 West Pico Boulevard; and 1308-1346 South Albany Street, Los Angeles CA 90015</b>
COMMUNITY PLAN AREA	Westlake
GENERAL PLAN DESIGNATION	Commercial Manufacturing
ZONING	CM-1 AND CM-1-HPOZ
COUNCIL DISTRICT	1 - Cedillo

<b>LEAD AGENCY</b>	<b>City of Los Angeles</b>
<b>CITY DEPARTMENT</b>	<b>Department of City Planning</b>
STAFF CONTACT	Johnny Le, Planning Assistant
ADDRESS	221 North Figueroa Street, Suite 1350 Los Angeles, CA 90012
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<b>APPLICANT</b>	1330 West Pico Blvd Group, LLC
ADDRESS	14724 Ventura Boulevard, Penthouse Los Angeles, CA 91404
PHONE NUMBER	(310) 393-9000

## PROJECT DESCRIPTION

The Project involves the demolition of an approximately 150,257-square-foot, three-story office building (which has been vacant since 2016) with rooftop and surface parking, located on an 114,132-gross-square-foot (2.62-acre) gross lot area rectangular-shaped site, and the construction of a 37-story (480-foot-tall building), 722,005-square-foot (6.45:1 FAR), mixed-use development with a five-level podium and a tower located on the north side of the Project Site. The development would include a 730-guest room hotel, 63,356 square feet of conference space, 5,405 square feet of office (hotel administration) space, 19,665 square feet of restaurant and bar use, and 9,325 square feet of spa/fitness space. Parking would be provided within four subterranean parking levels (approximately 43 feet in depth). The Project would provide short-term and long-term bicycle parking spaces located adjacent to the public right-of-way on Pico Boulevard and Albany Street and within the proposed parking levels. The Project would include the excavation and export of 168,400 cubic yards of soil from the Project Site. A City-initiated sign district would also be implemented on the Project Site and the adjacent single-family home (1350 Albany) and church (1356 Albany Street and 1315 14th Street) sites that make up the full city block. No other change would be made to the residential use or church. The Project also would include a comprehensive signage program. The Project includes a boundary change to the Pico - Union Historic Preservation Overlay Zone to remove a portion of the site from the district.

For additional detail, see “Section 3. Project Description”.

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## ENVIRONMENTAL SETTING

The Project Site is located on the southeast corner of Pico Boulevard and Albany Street, in the Westlake Community Plan of the City of Los Angeles, and portions of the Project Site is zoned as CM-1 and CM-1-HPOZ. The approximately 114,132-gross-square-foot (2.62-acre) rectangular-shaped site contains an approximately 150,257-square-foot, three-story office building with rooftop and surface parking, which have been vacant since 2016. No “protected trees,” as defined in the Los Angeles Municipal Code (LAMC), exist in the Project area. The five existing on-site trees, 14 existing street trees, and three off-site trees (located immediately outside the Project Site boundaries but are included in case they are affected by Project development) would be removed to accommodate the development of the Project. The Project Site is bounded on the north by Pico Boulevard (199’-10” frontage), on the west by Albany Street (435’-2” frontage), on the south by 14th Street (93’-11” frontage), and on the east

Surrounding uses in the Project Site vicinity include: to the north, across Pico Boulevard, are one-story commercial and office buildings (Korean Youth Community Center at 1319 Pico Boulevard (zoned CM-1-O); Los Angeles Football Club (LAFC) Experience Center at 1315 Pico Boulevard) (zoned CM-1-O); to the west, across Albany Street, are a two-story commercial building (Taco Bravo restaurant, Mission Evangelical Church, Tax Services, and Subway Restaurant at 1400 Pico Boulevard) (zoned CM-1) and nine two-story multi-family residential buildings at 1317-1357 Albany Street (zoned RD1.5-1-HPOZ); to the east, adjacent to the Project Site, is Interstate 110 (I-110) (zoned PF-1XL); and to the south, adjacent to the Project Site, are a single-family home (1350 Albany Street) and church (1356 Albany Street) at the corner of 14th Street and Albany Street (both of which are zoned CM-1-HPOZ). Farther south

across 14th Street is a surface parking lot (1401 Oak Street) for the adjacent multi-family, two-story residential building at 1400 Albany Street.

Located east of the Project Site, across I-110, is the Los Angeles Sports and Entertainment District (LASED) of Downtown Los Angeles, including the Convention Center, Staples Center, and LA Live.

The Project Site is located in the Pico-Union neighborhood, which is generally bounded by Olympic Boulevard, Normandie Avenue, the Santa Monica Freeway (I-10), and I-110. Regional access to the Pico-Union neighborhood by vehicle is via I-110 (approximately 30 feet east of the Project Site) and I-10 (approximately 1,300 feet south of the Project Site). Streets serving the project area include Venice Boulevard (Modified Avenue II in the Mobility Plan 2035), Pico Boulevard (Avenue II), Albany Street (Collector), Valencia Street, Oak Street (Local Street Standard), 14th Street (Local Street Standard), and Toberman Street (Local Street Standard).

For additional detail, see “Section 3. Project Description”.

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**OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED**  
**(e.g. permits, financing approval, or participation agreement.)**

None.

## 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 and 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 checked="" type="checkbox"/> Utilities / Service Systems        |
| <input checked="" type="checkbox"/> Energy                  | <input checked="" type="checkbox"/> Noise                    | <input type="checkbox"/> Wildfire                                      |
| <input type="checkbox"/> Geology / Soils                    | <input type="checkbox"/> Population / Housing                | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION

(To be completed by Lead Agency)

On the basis of this initial evaluation:

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

Johnny Le  
PRINTED NAME

Planning Assistant  
TITLE

  
SIGNATURE

2/28/2020  
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

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### 3.1 PROJECT SUMMARY

The Project involves the demolition of an approximately 150,257-square-foot, three-story office building (which has been vacant since 2016) with rooftop and surface parking located on an 114,132-gross-square-foot (2.62-acre) rectangular-shaped site, and the construction of a 37-story (480-foot-tall building), 722,005-square-foot (6.45:1 FAR), mixed-use development with a five-level podium and a tower located on the north side of the Project Site. The development would include a 730-guest room hotel, 63,356 square feet of conference space, 5,405 square feet of office (hotel administration) space, 19,665 square feet of restaurant and bar use, and 9,325 square feet of spa/fitness space. Parking would be provided within four subterranean parking levels (approximately 43 feet in depth). The Project would provide short-term and long-term bicycle parking spaces located adjacent to the public right-of-way on Pico Boulevard and Albany Street and within the proposed parking levels. The Project would include the excavation and export of 168,400 cubic yards of soil from the Project Site. A City-initiated sign district would also be implemented on the Project Site and the adjacent single-family home (1350 Albany) and church (1356 Albany Street and 1315 14th Street) sites that make up the full city block. No other change would be made to the residential use or church. The Project also would include a comprehensive signage program. The Project includes a boundary change to the Pico - Union Historic Preservation Overlay Zone to remove a portion of the site from the district.

### 3.2 ENVIRONMENTAL SETTING

#### 3.2.1 Project Location

See **Figure 3-1, Vicinity Map**, for the location within the context of the City.

See **Figure 3-2, Aerial Map**, for an aerial of the Site and the immediate surrounding area.

The Project Site is located on the southeast corner of Pico Boulevard and Albany Street, in the Westlake Community Plan of the City of Los Angeles, and portions of the Project Site is zoned as CM-1 and CM-1-HPOZ. The approximately 114,132-gross-square-foot (2.62-acre) rectangular-shaped site contains an approximately 150,257-square-foot, three-story office building (which have been vacant since 2016) with rooftop and surface parking. No “protected trees,” as defined in the Los Angeles Municipal Code (LAMC), exist in the Project area. The five existing on-site trees, 14 existing street trees, and three off-site trees (located immediately outside the Project Site boundaries but are included in case they are affected by Project development) would be removed to accommodate the development of the Project. The Project Site is bounded on the north by Pico Boulevard (199'-10" frontage), on the west by Albany

Street (435'-2" frontage), on the south by 14th Street (93'-11" frontage), and on the east by the Harbor Freeway (I-110).

Surrounding uses in the Project Site vicinity include: to the north, across Pico Boulevard, are one-story commercial and office buildings (Korean Youth Community Center at 1319 Pico Boulevard (zoned CM-1-O); LAFC Experience Center at 1315 Pico Boulevard) (zoned CM-1-O); to the west, across Albany Street, are a two-story commercial building (Taco Bravo restaurant, Mission Evangelical Church, Tax Services, and Subway Restaurant at 1400 Pico Boulevard) (zoned CM-1) and nine two-story multi-family residential buildings at 1317-1357 Albany Street (zoned RD1.5-1-HPOZ); to the east, adjacent to the Project Site, is I-110 Freeway (zoned PF-1XL); and to the south, adjacent to the Project Site, are a single-family home (1350 Albany Street) and church (1356 Albany Street) at the corner of 14th Street and Albany Street, both of which are zoned CM-1-HPOZ. Farther south across 14th Street is a surface parking lot (1401 Oak Street) for the adjacent multi-family, two-story residential building at 1400 Albany Street.

Located east of the Project Site, across I-110, is the Los Angeles Sports and Entertainment District (LASED) of Downtown Los Angeles, including the Convention Center, Staples Center, and LA Live.

The Project Site is located in the Pico-Union neighborhood, which is generally bounded by Olympic Boulevard, Normandie Avenue, the Santa Monica Freeway (I-10), and I-110. Regional access to the Pico-Union neighborhood by vehicle is via I-110 (approximately 30 feet east of the Project Site) and I-10 (approximately 1,300 feet south of the Project Site). Streets serving the project area include Venice Boulevard (Modified Avenue II in the Mobility Plan 2035), Pico Boulevard (Avenue II), Albany Street (Collector), Valencia Street, Oak Street (Local Street Standard), 14th Street (Local Street Standard), and Toberman Street (Local Street Standard).

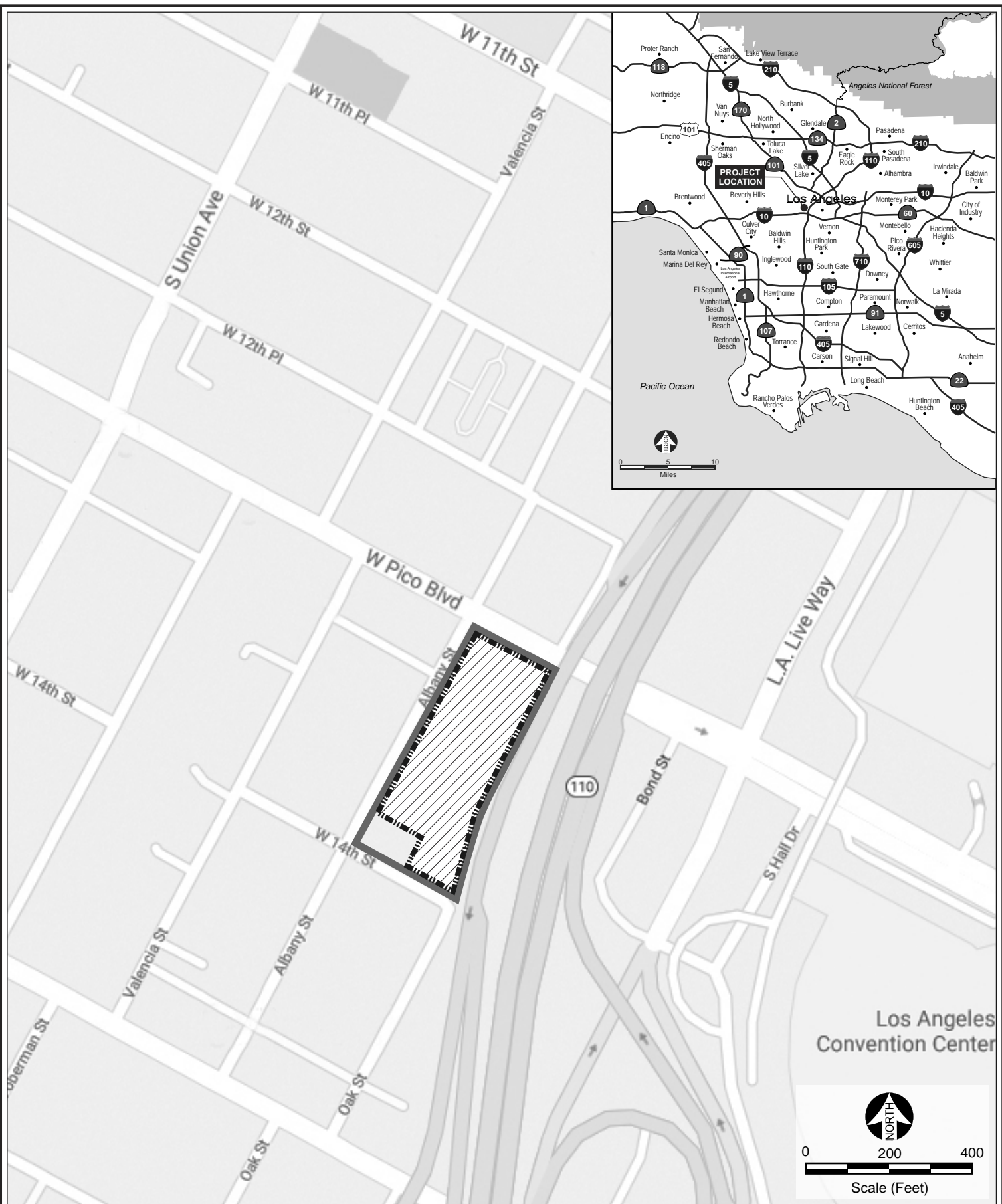


Figure 3-1  
Vicinity Map





### Legend

- Proposed Sign District
- Project Site

Source: Google Maps 2019.

Figure 3-2  
Aerial Map

### 3.2.2 Existing Conditions

The approximately 114,132-square-foot (2.62-acre), rectangular-shaped site, which contains an approximately 150,257-square-foot, three-story office building with rooftop and surface parking, has been vacant since 2016.<sup>1</sup> All uses on the Project Site would be removed as part of the Project.

Trees designated as “protected trees,” as defined by Section 17.02 of LAMC, include oak trees (*Quercus spp.*), Southern California black walnuts (*Juglans californica*), western sycamores (*Platanus racemosa*), and California bay laurels (*Umbellularia californica*) that have a trunk diameter of four inches or greater in diameter at 4.5 feet above ground (i.e., diameter at breast height [DBH]). No protected trees occur in the Project area. See **Table 3-1, Existing Tree Inventory**, for a description of the trees on the Project Site and surrounding the Project Site.

The 5 existing on-site trees, 14 existing street trees, and 3 off-site trees (located immediately outside the Project Site boundaries but are included in case they are affected by Project development) would be removed to accommodate the development of the Project, as shown in **Table 3-1.**<sup>2</sup> Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, any removed street trees would be replaced on a 2:1 basis.

**Table 3-1  
Existing Tree Inventory**

Trees	Species	Protected Species
<b>On-site Trees</b>		
5	1 Brazilian pepper ( <i>Schinus terebinthifolius</i> ) 1 Canary Island palm ( <i>Phoenix canariensis</i> ) 1 Queensland umbrella tree ( <i>Schefflera actinophylla</i> ) 1 olive tree ( <i>Olea europaea</i> ) 1 fern pine ( <i>Afrocarpus gracillior</i> )	No
<b>Street Trees</b>		
14	9 lemon bottlebrush trees ( <i>Callistemon citrinus</i> ) 5 California fan palms ( <i>Washingtonia filifera</i> )	No
<b>Off-site trees that may be affected by the project</b>		
3	2 camphor trees ( <i>Cinnamomum camphora</i> ) 1 avocado tree ( <i>Persea americana</i> )	No
PSOMAS, Tree Evaluation Report, May 23, 2018, included as Appendix B to this IS.		

The Project Site is located within the Westlake Community Plan (Community Plan) area. The Community Plan was adopted in September 1997 and designates the Project Site as Commercial Manufacturing. The Project Site is zoned as CM-1 (Commercial Manufacturing, Height District 1) and CM-1-HPOZ (Historic Preservation Overlay Zone). The total floor area contained in a building on a lot in Height District No. 1 is limited to 1.5 times the buildable area of the lot (i.e., floor area ratio [FAR] of 1.5:1).

The Project Site’s information, including the Assessor’s Parcel Number (APN), is listed in **Table 3-2, Project Site Information**.

<sup>1</sup> Environmental Assessment Form, December 2018.

<sup>2</sup> PSOMAS, Tree Evaluation Report, May 23, 2018, included as Appendix B to this IS.



The Project Site is also within the boundaries of the former Los Angeles State Enterprise Zone<sup>3</sup>, and is located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. Adopted in 2013, SB 743 [Public Resources Code (PRC) Section 21099(d)] established new rules for evaluating certain types of projects' aesthetics and parking impacts under CEQA. PRC Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." Specific definitions are provided in PRC Sections 21099 and 21064.3. PRC Section 21099(a)(7) defines a TPA as an area within one-half mile of a major transit stop that is existing or planned. PRC Section 21064.3 defines a 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 service interval of 15 minutes or less during the morning and afternoon peak commute periods.

PRC Section 21099(a)(1) defines an "employment center project" as a project located on property zoned for commercial uses with an FAR of no less than 0.75 and that is located within a TPA. PRC Section 21099(a)(4) 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 by an improved public right-of-way from, parcels that are developed with qualified urban uses. Accordingly, SB 743 applies to the Project as the Project is an employment center project on an infill site that is within a TPA.

In addition, 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 states that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the L.A. CEQA Thresholds Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

ZI File No. 2427 is a freeway adjacent advisory notice for developments located within 1,000 feet of a freeway to be advised of air pollution exposure and associated health risks, and design alternatives to consider. All projects seeking discretionary approval for which findings must be made regarding conformance to the General Plan are expected to adhere to the Citywide Design Guidelines, including those that address freeway proximity.

The southern two-thirds of the existing building at the Project Site is located within the boundary of the Pico-Union Historic Preservation Overlay Zone (HPOZ) as a non-contributing structure. The Pico-Union HPOZ is generally bounded by 11<sup>th</sup> Street and Olympic Boulevard to the north, Union Avenue and I-110 to the east, Washington Boulevard and I-10 to the south, and Hoover Street to the west. The Pico-Union HPOZ consists of 798 structures, 528 of which are "contributing" to the significance of the area, and the remaining 270 are classified as "non-contributing structures." The area was found to be significant for its concentration of residential properties "dating from the late 19<sup>th</sup> century through the early 1930s."<sup>4</sup> Most residential buildings across from and adjacent to the Project Site were constructed by 1906 and are designed in a

<sup>4</sup> Los Angeles City Planning Commission, City Plan Case No. 2002-6297-HPOZ, June 17, 2004, pages 3-4: <https://planning.lacity.org/pdiscaseinfo/Home/GetDocument/ODY1MmU1YWQtODkzNi00MmZjLTg3Y2MtZTQzZGUxYzY0Mzcw0>, accessed February 11, 2020.

Craftsman style. While “contributing” structures were constructed during the period of significance of the HPOZ, “non-contributing structures” were constructed during a different period or no longer retain features that identify it from the period of significance. Projects located within an HPOZ require a Certificate of Appropriateness (for contributing structures) or Certificate of Compatibility (non-contributing structures). However, on March 28, 2018, the City Council adopted a motion to initiate the process to amend the boundaries of the HPOZ to remove said portion of the Project Site from the HPOZ.<sup>5</sup> Therefore, a Certificate of Compatibility is not required.

**Table 3-2**  
**Project Site Information**

<b>Address</b>	<b>Size (sf)</b>	<b>APN</b>	<b>Zone</b>	<b>General Plan Land Use</b>
1330 W. Pico Boulevard, 1308 S. Albany Street	3,659.3	5139-035-020	CM-1	Commercial Manufacturing
None	1,141.5	5139-035-020	CM-1	Commercial Manufacturing
None	1,141.5	5139-035-020	CM-1	Commercial Manufacturing
None	4,941.7	5139-035-020	CM-1	Commercial Manufacturing
None	4,941.4	5139-035-020	CM-1	Commercial Manufacturing
None	2,472.5	5139-035-020	CM-1	Commercial Manufacturing
None	2,539.4	5139-035-020	CM-1	Commercial Manufacturing
1312 S. Albany Street	2,847.0	5139-035-020	CM-1	Commercial Manufacturing
None	947.1	5139-035-020	CM-1	Commercial Manufacturing
None	2,992.7	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1316 S. Albany Street	5,992.9	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	3,962.7	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1320 S. Albany Street	5,997.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	3,954.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1326 S. Albany Street	5,997.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	4,034.6	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1330 S. Albany Street	4,800.0	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	4,244.0	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	1,197.0	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1338 S. Albany Street	3,003.0	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	4,545.4	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	2,994.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	1,500.0	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	4,941.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1342 S. Albany Street	4,497.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
1346, 1348 S. Albany Street	5,997.1	5139-035-012	CM-1-HPOZ	Commercial Manufacturing
None	5,432.9	5139-035-020	CM-1-HPOZ	Commercial Manufacturing

<sup>5</sup> Council Action March 27, 2018, File No. 18-0164, included as Appendix A-2 to this IS.



None	5,929.3	5139-035-020	CM-1-HPOZ	Commercial Manufacturing
None	5,997.1	5139-035-020	CM-1-HPOZ	Commercial Manufacturing

Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, October 2018.

### 3.2.3 Surrounding Land Uses

The Project Site is located in a highly urbanized area surrounded by existing and planned development. Surrounding uses in the Project Site vicinity include the following: to the north, across Pico Boulevard, are one-story commercial and office buildings (Korean Youth Community Center at 1319 Pico Boulevard; LAFC Experience Center at 1315 Pico Boulevard) (zoned CM-1-O); to the west, across Albany Street, are a two-story commercial building (Taco Bravo restaurant, Mission Evangelical Church, Tax Services, and Subway Restaurant at 1400 Pico Boulevard) (zoned CM-1) and nine two-story multi-family residential buildings at 1317-1357 Albany Street (zoned RD1.5-1-HPOZ); to the east, adjacent to the Project Site, is I-110 Freeway (zoned PF-1XL); and to the south, adjacent to the Project Site, are a single-family home (1350 Albany Street) and church (1356 Albany Street) at the corner of 14th Street and Albany Street, both of which are zoned CM-1-HPOZ. Farther south across 14th Street is a surface parking lot (1401 Oak Street) for the adjacent multi-family, two-story residential building at 1400 Albany Street.

## 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

The Project involves the demolition of an approximately 150,257-square-foot, three-story vacant office building with rooftop and surface parking located on an 114,132-gross-square-foot (2.62-acre) rectangular-shaped site, and the construction of a 37-story (480-foot tall building), 722,005-square-foot (6.5:1 FAR), mixed-use development with a five-level podium and tower located on the north side of the Project Site. The development would include: a 730-guest room hotel, 63,356 square feet of conference function space, 5,405 square feet of office (hotel administration) space, 19,665 square feet of restaurant and bar use, and 9,325 square feet of spa/fitness space.

See **Table 3-3, Proposed Uses**, for a description of the project components.

**Table 3-3**  
**Proposed Uses**

Proposed Uses	Quantity	Floor Area (sf)
Hotel	730 rooms	624,254
Ballroom		21,273
Jr. Ballroom		8,226
Meeting Rooms		26,814
Rooftop Pavilion		7,043
<b>Conference Functions Total</b>		<b>63,356</b>
Hotel Admin Office		5,405
Lobby Restaurant	87 seats	3,233
Lobby Bar	167 seats	3,117

All Day Restaurant	195 seats	7,678
Specialty Restaurant	170 seats	3,710
Rooftop Bar	473 seats	1,917
<b>Restaurants and Bars Total</b>		<b>19,665</b>
Spa/Fitness		9,325
<b>Total</b>		<b>722,005</b>
sf = square feet HOK, <u>Plans</u> , November 2019, included as Appendix A-1 to this IS.		

The podium's floor plans for Level 1 through 6 are shown in **Figure 3-3** through **Figure 3-8**. The typical tower floor plans for Level 7 through the roof are shown in **Figure 3-9** and **Figure 3-10**.

Based on a shared parking demand study, a total of 443 parking stalls<sup>6</sup> would be provided within four subterranean parking levels (approximately 43 feet in depth). There would also be 386 bicycle parking spaces.

The Project would include the excavation and export of 168,400 cubic yards of soil from the Project Site.

The Project Site has a corresponding zone classification of CM-1 and CM-1-HPOZ, allowing a maximum FAR of 1.5:1. The inclusion of hotel uses would require a General Plan Amendment (GPA) from "Commercial Manufacturing" to "Regional Center Commercial" and a Zone Change/Height District Change from CM-1 and CM-1-HPOZ (which prohibits hotel uses and has an FAR limitation of 1.5:1) to a C2-4 zone (which would allow hotel and commercial uses, as well as the proposed 6.45:1 FAR).

The building podium would be approximately 75 feet (5 stories), and the tower would be approximately 405 feet (32 stories), for total maximum building height of approximately 480 feet (37 stories).

The Project would include a comprehensive signage program, including a mix of static tenant identification signs, wayfinding signs, pylon signs, digital signs, and supergraphic signs.

A City-initiated sign district<sup>7</sup> would be implemented on the Project Site and certain adjacent parcels. The proposed boundary of the sign district encompasses the Project Site and the property adjacent to the Project Site on the same block, which includes the off-site single-family home (1350 Albany Street) and church (1356 Albany Street). This proposed sign district is bounded on the west by Albany Street, on the north by Pico Boulevard, on the south by 14<sup>th</sup> Street, and on the east by I-110, as shown in **Figure 3-2**, above. No signage is proposed on the off-site properties as part of the Project. All off-site existing uses would remain. Future signage on the off-site properties would require the property owners of the off-site properties to comply with current code requirements for signage, including those regulations required under the HPOZ. These actions would be subject to additional review by the City on a case-by-case basis. By including the adjacent parcels, the sign district encompasses the minimum required area, a

<sup>6</sup> Gibson Transportation, Shared Parking Study, October 16, 2019, included as Appendix A-3 to this IS.

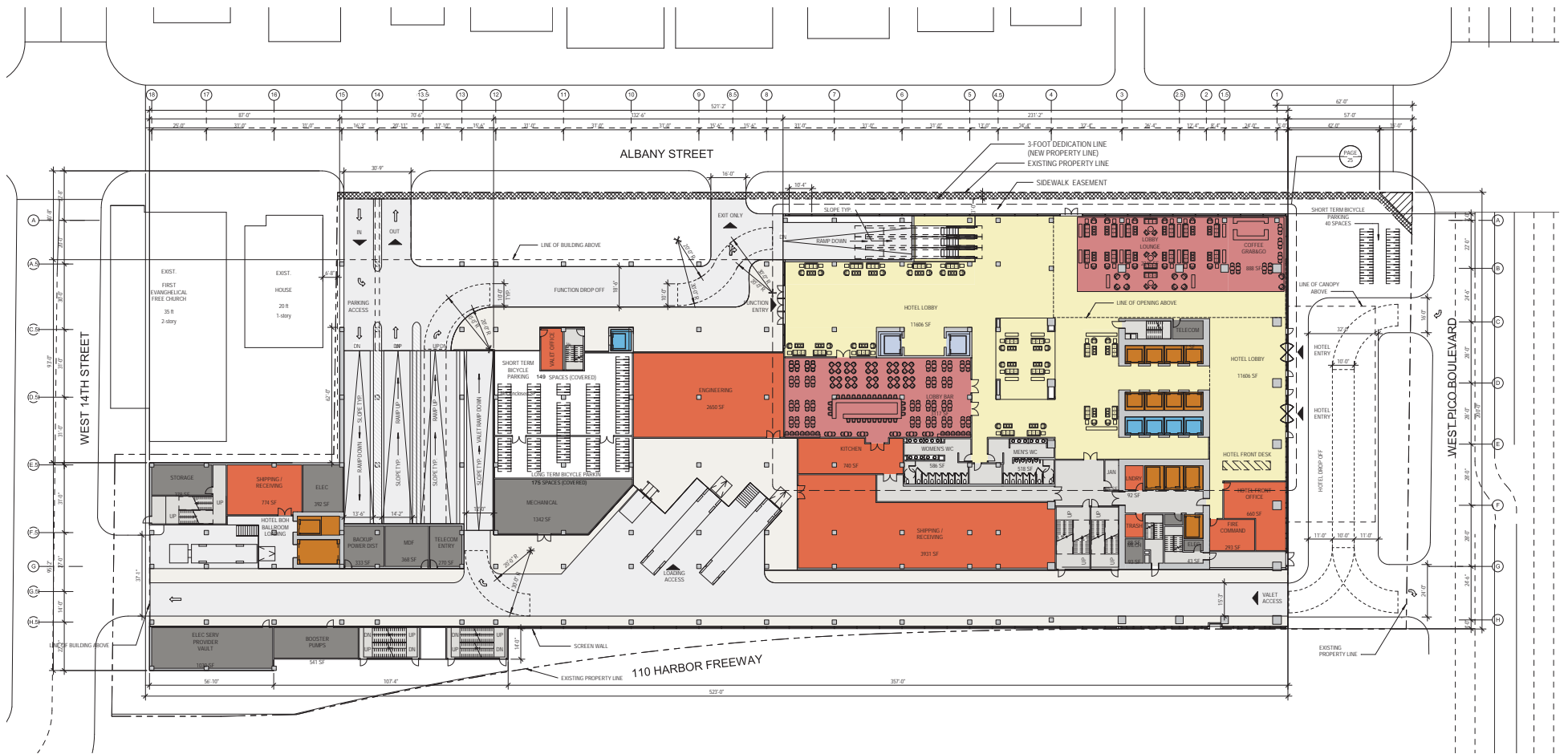
<sup>7</sup> City of Los Angeles Planning & Land Use Management, City Motion: [http://clkrep.lacity.org/online/docs/2018/18-0509\\_mot\\_09-04-2019.pdf](http://clkrep.lacity.org/online/docs/2018/18-0509_mot_09-04-2019.pdf), September 4, 2019.

contiguous city block.<sup>8</sup>

The Project includes a boundary change to the Pico - Union Historic Preservation Overlay Zone to remove a portion of the site from the district.

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<sup>8</sup> LAMC Section 13.11-B.



#### AREA SUMMARY

Lobby Bar / Lounge / Grab & Go: 6,350 ft<sup>2</sup>  
 Hotel Office: 660 ft<sup>2</sup>  
 Hotel Lobby / BOH: 24,553 ft<sup>2</sup>

#### SEAT COUNT SUMMARY

Lobby Bar: 167 seats / Lounge: 71 seats / Grab & Go: 16 seats  
 Hotel Lobby: 72 seats  
 Total Seats: 326

#### LEGEND

- |   |   |  |
|---|---|--|
| <span style="color: yellow;">●</span> Amenities           | <span style="color: red;">●</span> Hotel Support                    | <span style="color: grey;">●</span> Mechanical         |
| <span style="color: lightgrey;">●</span> Building Support | <span style="color: blue;">●</span> Hotel Function Space            | <span style="color: lightgrey;">●</span> Parking       |
| <span style="color: yellow;">●</span> Circulation         | <span style="color: orange;">●</span> Hotel Guestrooms              | <span style="color: blue;">●</span> Podium Elevators   |
| <span style="color: red;">●</span> F&B                    | <span style="color: orange;">●</span> Hotel Circulation/Prefunction | <span style="color: blue;">●</span> Ballroom Elevators |





#### AREA SUMMARY

Meeting Rooms: 21,592 ft<sup>2</sup>

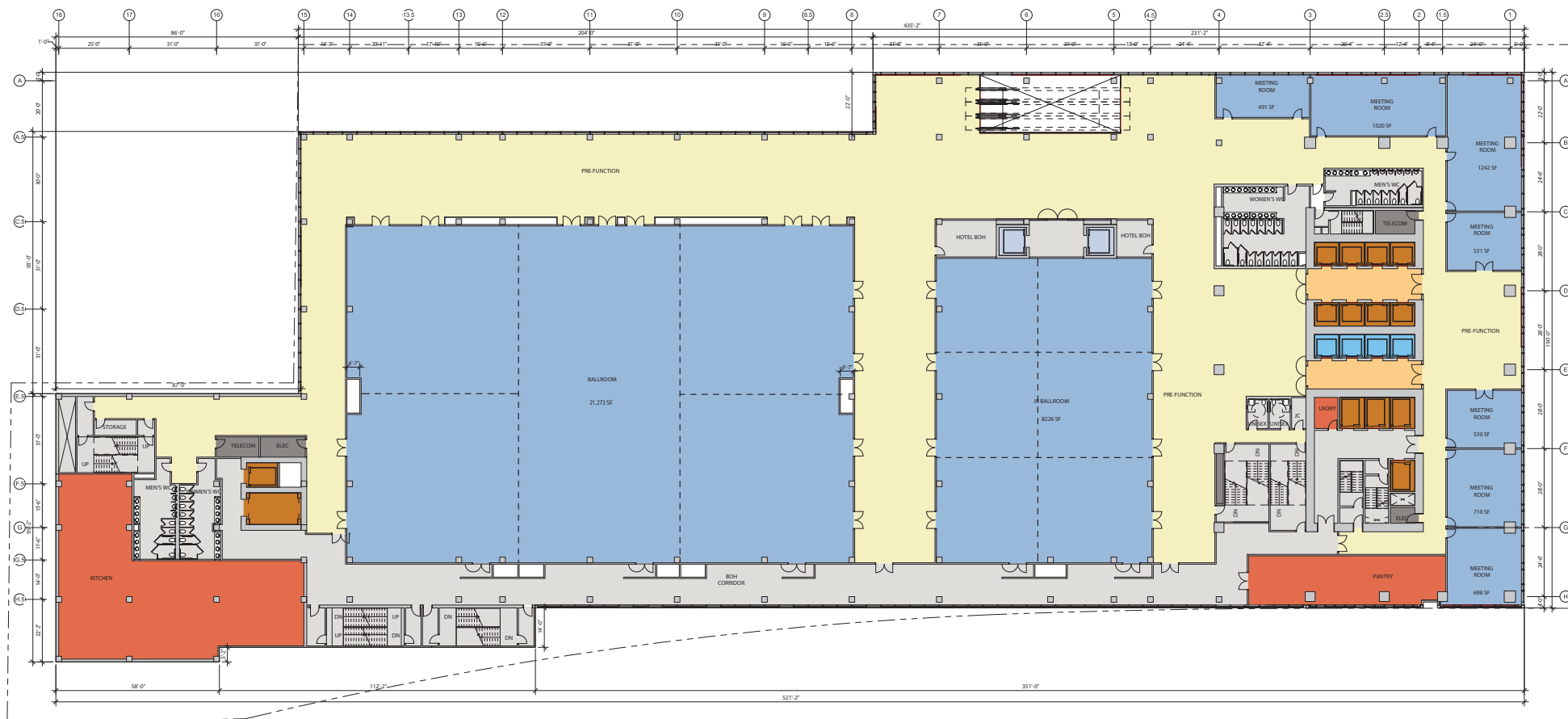
Prefunction / BOH: 32,416 ft<sup>2</sup>

#### LEGEND

- |   |   |  |
|---|---|--|
| <span style="color: yellow;">●</span> Amenities           | <span style="color: red;">●</span> Hotel Support                    | <span style="color: gray;">●</span> Mechanical         |
| <span style="color: lightgray;">●</span> Building Support | <span style="color: blue;">●</span> Hotel Function Space            | <span style="color: lightgray;">●</span> Parking       |
| <span style="color: yellow;">●</span> Circulation         | <span style="color: orange;">●</span> Hotel Guestrooms              | <span style="color: blue;">●</span> Podium Elevators   |
| <span style="color: red;">●</span> F&B                    | <span style="color: orange;">●</span> Hotel Circulation/Prefunction | <span style="color: blue;">●</span> Ballroom Elevators |



Figure 3-4  
Podium Level 2



#### AREA SUMMARY

Ballrooms / Meeting Rooms: 34,721 ft<sup>2</sup>

Prefunction / BOH: 27,225 ft<sup>2</sup>

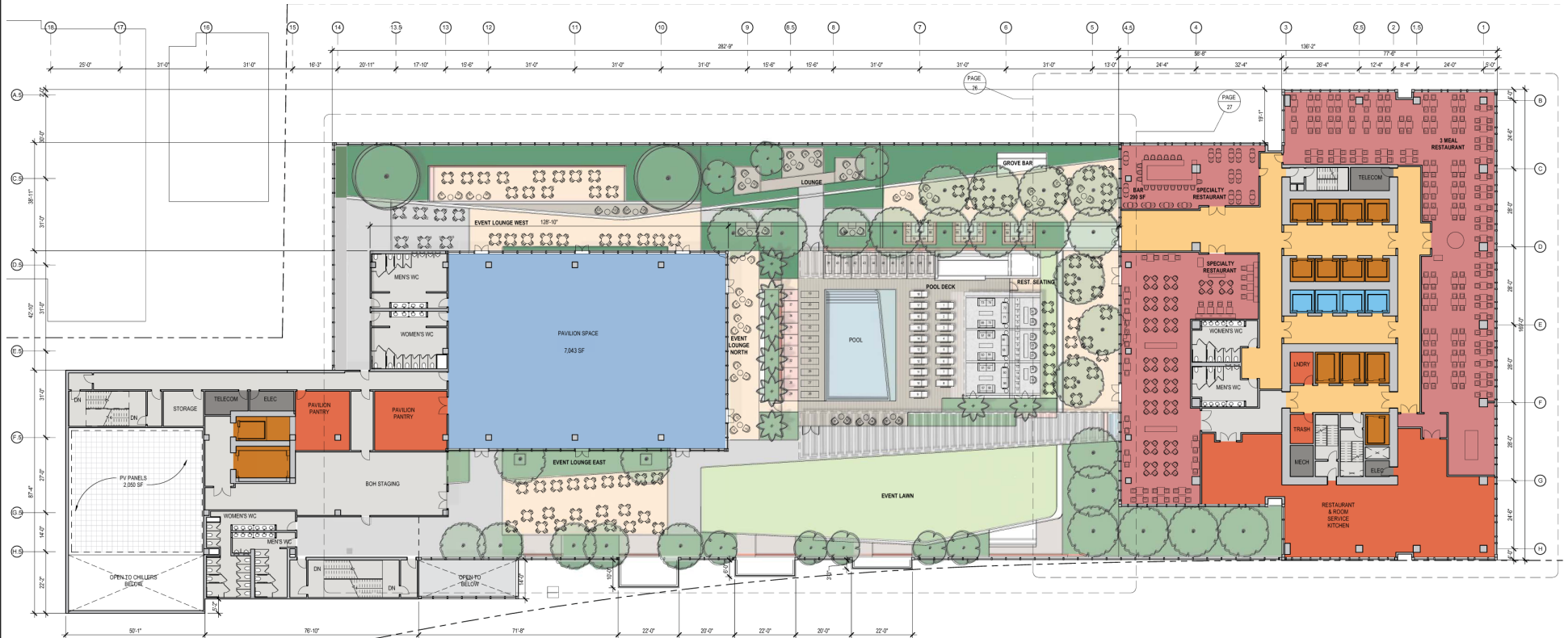
#### LEGEND

- Amenities
- Building Support
- Circulation
- F&B
- Hotel Support
- Hotel Function Space
- Hotel Guestrooms
- Hotel Circulation/Prefunction
- Mechanical
- Parking
- Podium Elevators
- Ballroom Elevators



Figure 3-5  
Podium Level 3





#### AREA SUMMARY

Pavillion Ballroom: 7,043 ft<sup>2</sup>  
 Restaurants / Podium Bars: 13,305 ft<sup>2</sup>  
 Hotel Support: 1,146 ft<sup>2</sup>

#### SEAT COUNT SUMMARY

Specialty Restaurant: 120 seats  
 Specialty Restaurants / Podium Bars: 50 seats  
 Three Meal Restaurant: 195 seats  
 Restaurant seating: 100 seats

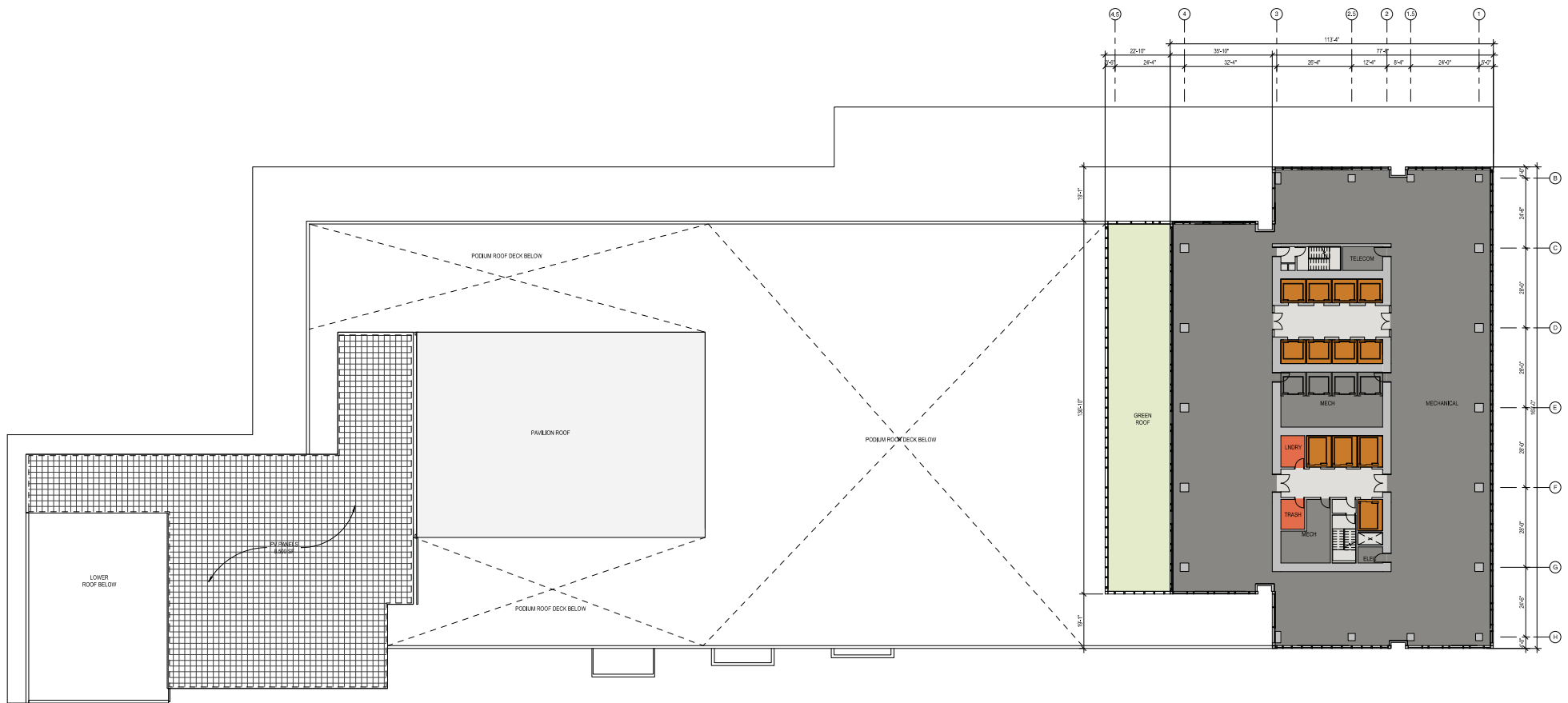
Pool Deck: 74 seats  
 Event Lounge North: 14 seats  
 Event Lounge East: 88 seats  
 Event Lounge West: 125 seats  
 Lounge: 16 seats  
 Grove Bar: 72 seats  
 Total Seats: 854

#### LEGEND

- Amenities
- Building Support
- Circulation
- F&B
- Hotel Support
- Hotel Function Space
- Hotel Guestrooms
- Hotel Circulation/Prefunction
- Mechanical
- Parking
- Podium Elevators
- Ballroom Elevators



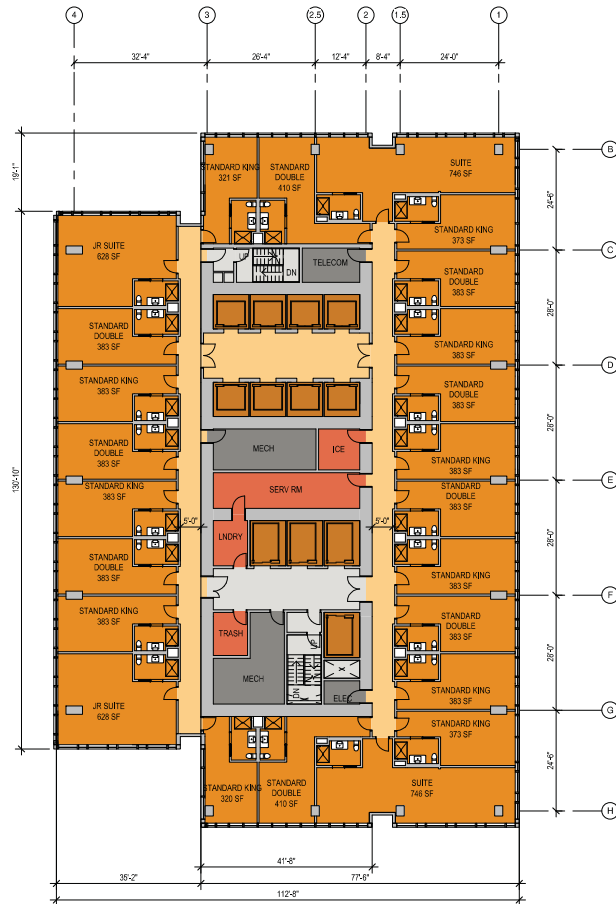




#### LEGEND

- |   |   |  |
|---|---|--|
| <span style="color: yellow;">●</span> Amenities           | <span style="color: red;">●</span> Hotel Support                    | <span style="color: gray;">●</span> Mechanical         |
| <span style="color: lightgray;">●</span> Building Support | <span style="color: blue;">●</span> Hotel Function Space            | <span style="color: lightgray;">●</span> Parking       |
| <span style="color: yellow;">●</span> Circulation         | <span style="color: orange;">●</span> Hotel Guestrooms              | <span style="color: blue;">●</span> Podium Elevators   |
| <span style="color: red;">●</span> F&B                    | <span style="color: orange;">●</span> Hotel Circulation/Prefunction | <span style="color: blue;">●</span> Ballroom Elevators |



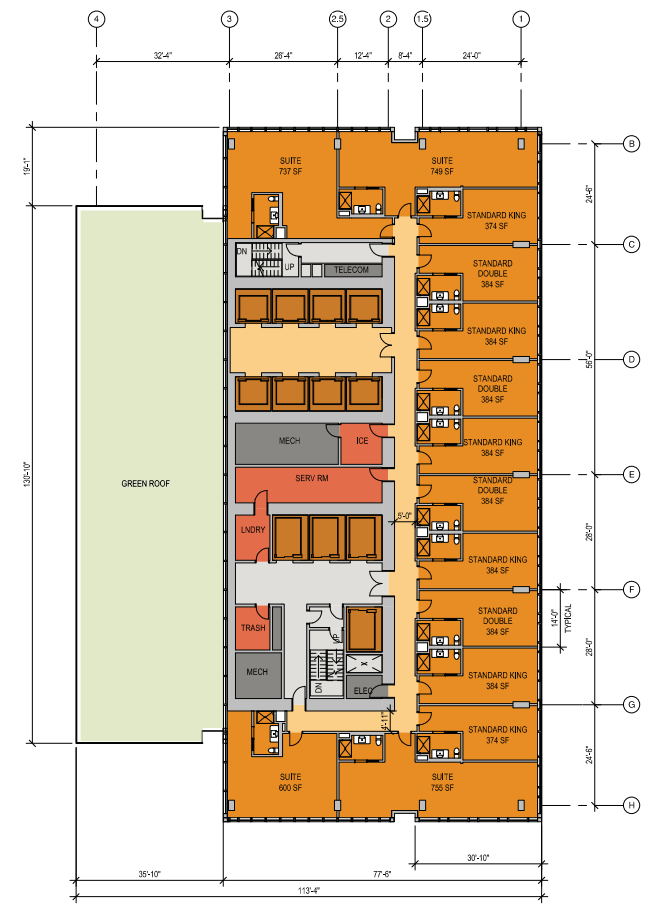


**LEVEL 7**  
TYPICAL HOTEL LEVEL

#### AREA SUMMARY

Typical Levels: 15,329 ft<sup>2</sup>

Level 34: 11,017 ft<sup>2</sup>

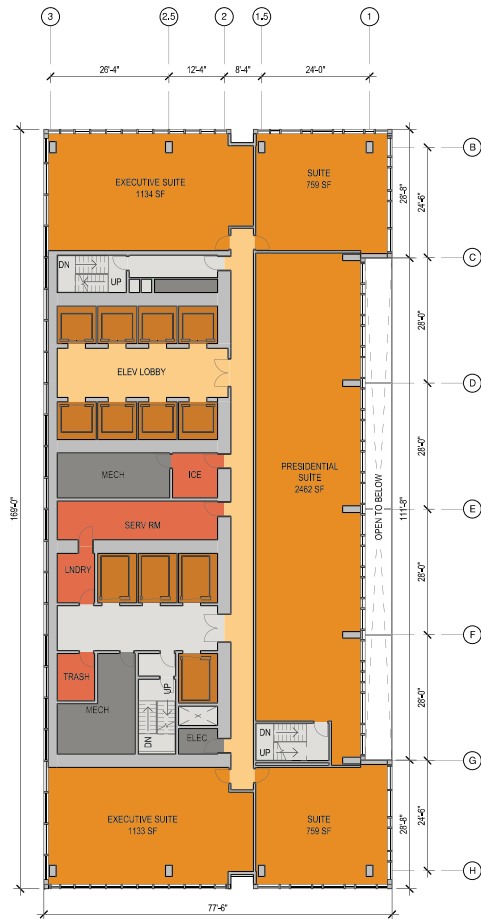


**LEVEL 34**

#### LEGEND

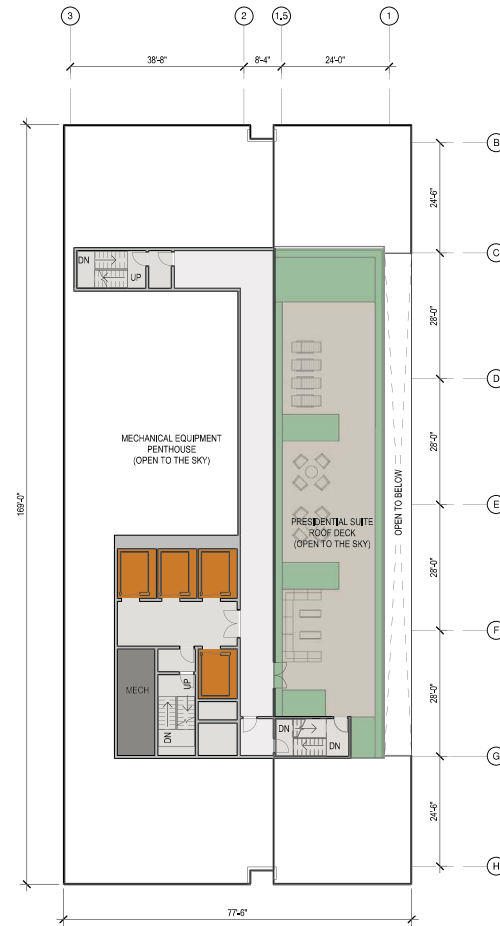
- |   |  |   |
|---|--|---|
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| <span style="color: #A9A9A9;">●</span> Building Support | <span style="color: #4682B4;">●</span> Hotel Function Space          | <span style="color: #D3D3D3;">●</span> Parking            |
| <span style="color: #90EE90;">●</span> Circulation      | <span style="color: #FF8C00;">●</span> Hotel Guestrooms              | <span style="color: #4682B4;">●</span> Podium Elevators   |
| <span style="color: #CD5C5C;">●</span> F&B              | <span style="color: #FFDAB9;">●</span> Hotel Circulation/Prefunction | <span style="color: #4682B4;">●</span> Ballroom Elevators |

**Figure 3-9**  
Tower Levels 7 and 34



#### AREA SUMMARY

Level 37: 10,227 ft<sup>2</sup>



#### LEGEND

- |   |   |  |
|---|---|--|
| <span style="color: orange;">●</span> Amenities           | <span style="color: red;">●</span> Hotel Support                    | <span style="color: gray;">●</span> Mechanical         |
| <span style="color: lightgray;">●</span> Building Support | <span style="color: blue;">●</span> Hotel Function Space            | <span style="color: lightgray;">●</span> Parking       |
| <span style="color: yellow;">●</span> Circulation         | <span style="color: orange;">●</span> Hotel Guestrooms              | <span style="color: blue;">●</span> Podium Elevators   |
| <span style="color: red;">●</span> F&B                    | <span style="color: orange;">●</span> Hotel Circulation/Prefunction | <span style="color: blue;">●</span> Ballroom Elevators |

Figure 3-10  
Tower Levels 37 and Roof

### 3.3.2 Design and Architecture

The Project would serve as a transition between I-110 and entertainment district to the east and low-rise residential uses to the west. The Project would not remove any existing housing stock or current employment as it would replace a vacant office building with new construction that is compatible with the adjoining neighborhood and reflective of the growth of the Pico Boulevard corridor as a commercial and hotel destination for the district.

The building's design is composed of a single structure and includes a 37-story tower element fronting Pico Boulevard to the north of the Project Site and five-story podium for the remainder of the Project Site. The tower includes three slim vertical elements stepping down in height from north to south and dropping towards the fifth-floor podium deck. Building materials would primarily include metal, plaster, and glass. The design of the Project is intended to construct a building that is contemporary, but evokes the traditional vernacular style of the adjacent buildings. A conceptual rendering of the proposed building is provided in **Appendix A-1**.

The Project would provide a range of on-site open spaces accessible to the public. On the ground level, the Project would include enhanced streetscaping, such as trees, landscaping, and a plaza on the corner of Albany Street and Pico Boulevard. On the fourth level of the podium, the Project would provide an outdoor landscaped terrace, spa, and indoor and outdoor fitness areas for hotel guests. On the fifth level of the podium, the Project would provide an outdoor amenity deck with a swimming pool, lounge areas, and dining areas. On the 6th and 34th levels of the tower, the Project would include a green roof, which is a roof that is partially covered with plant groundcover, such as an evergreen perennial.

### 3.3.3 Open Space and Landscaping

A total of 83,052 square feet of open space would be provided, as shown in **Table 3-3, Open Space**. Social and community spaces for the hotel visitors would include a lobby/lounge with a restaurant on the ground floor, a landscaped plaza on the corner of Albany Street and Pico Boulevard, landscaped terrace, spa, and indoor and outdoor fitness areas on the 4th floor, an outdoor amenity deck with a swimming pool, lounge areas, and dining areas on the 5th floor, green roofs on the 6th and 34th floors, and an open rooftop deck for the 37th-floor presidential suite. The landscape plans for Levels 1, 4, 5, 6, 34, and 38 are shown in **Figure 3-11** through **Figure 3-16**.

Nineteen trees would be replaced, and 90 trees would be provided (32 trees on the ground level, 11 trees on Level 4, and 47 trees on Level 5).<sup>9</sup> Specific tree and plant species to be provided are presented as part of **Appendix A-1** of this IS.

**Table 3-3  
Open Space**

Location	Size (sf)	Description
Ground Level Open Space	26,710	Hotel Garden with entry feature element; seating; trees; landscaped plaza, ground cover streetscape

<sup>9</sup> HOK, *Plans*, November 2019, included as Appendix A-1 to this IS.

Level 4 Open Space	14,033	Outdoor fitness deck with ground cover; green roof walking path; trees
Level 5 Open Space	32,584	Ground cover and trees
Level 6 Open Space	2,812	Ground cover
Level 34 Open Space	4,451	Ground cover
Level 38 Open Space	2,462	Ground cover, shrubs, and trees
<b>Total</b>	<b>83,052</b>	
sf = square feet HOK, Plans, November 2019, included as Appendix A-1 to this IS.		

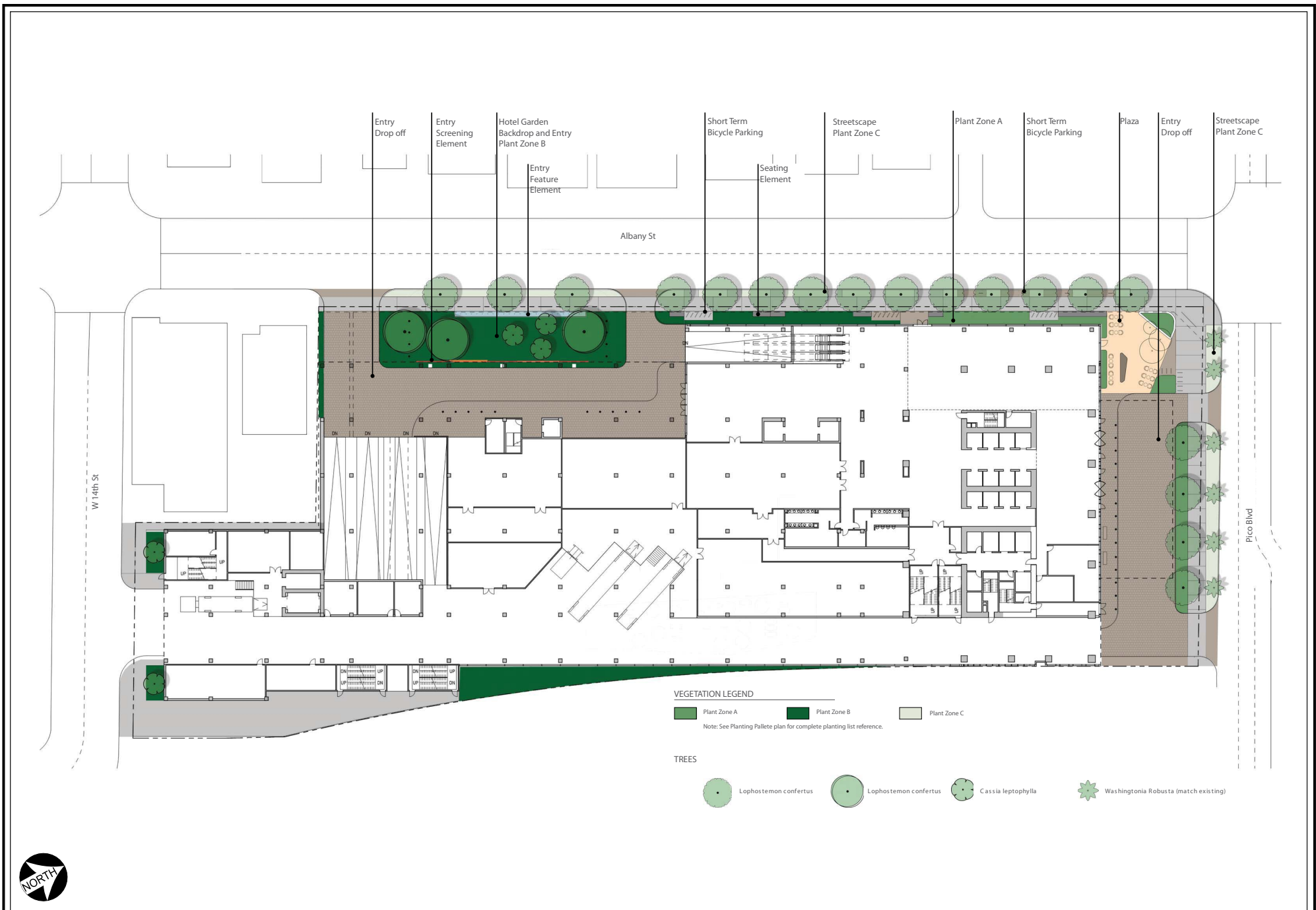
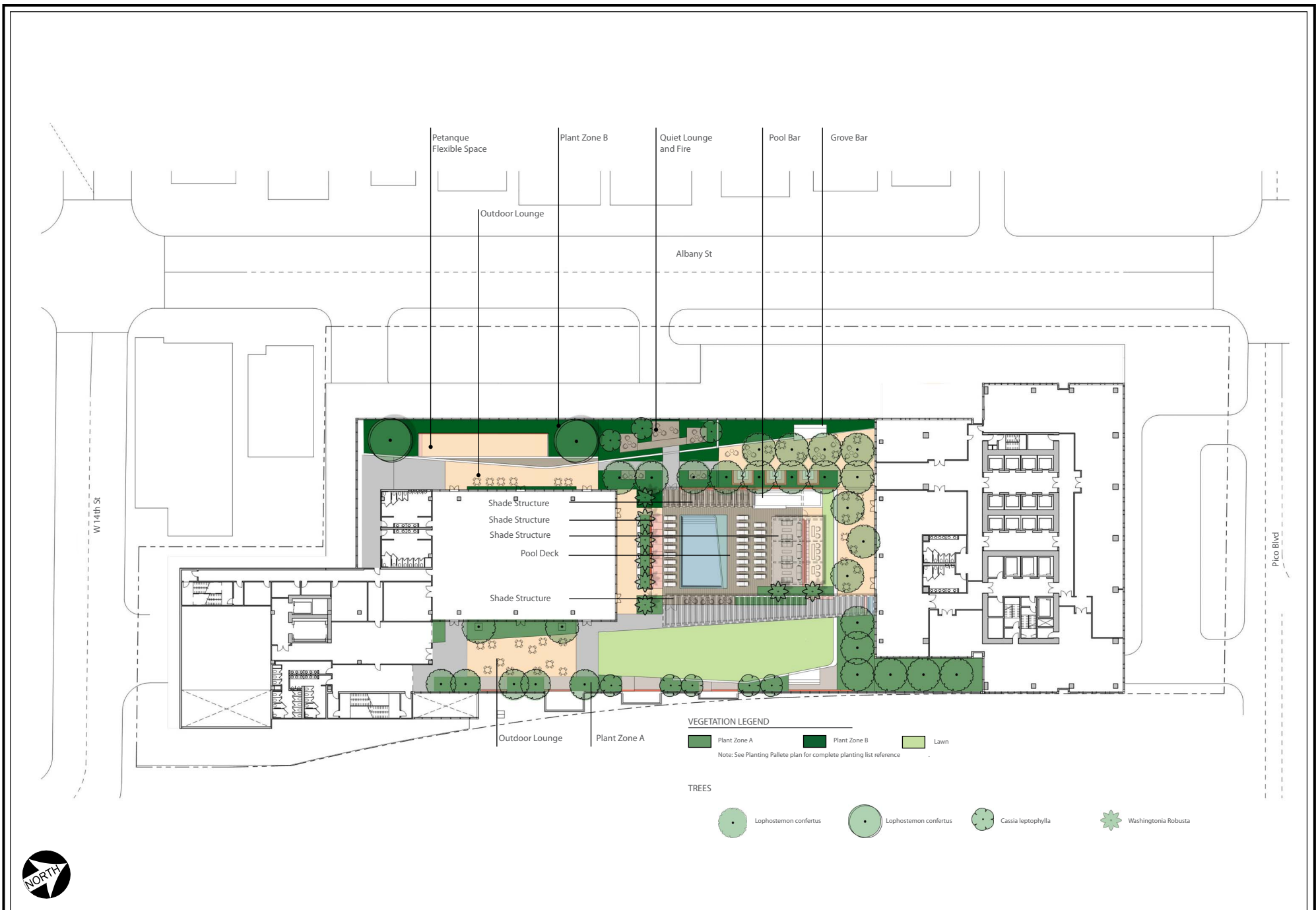
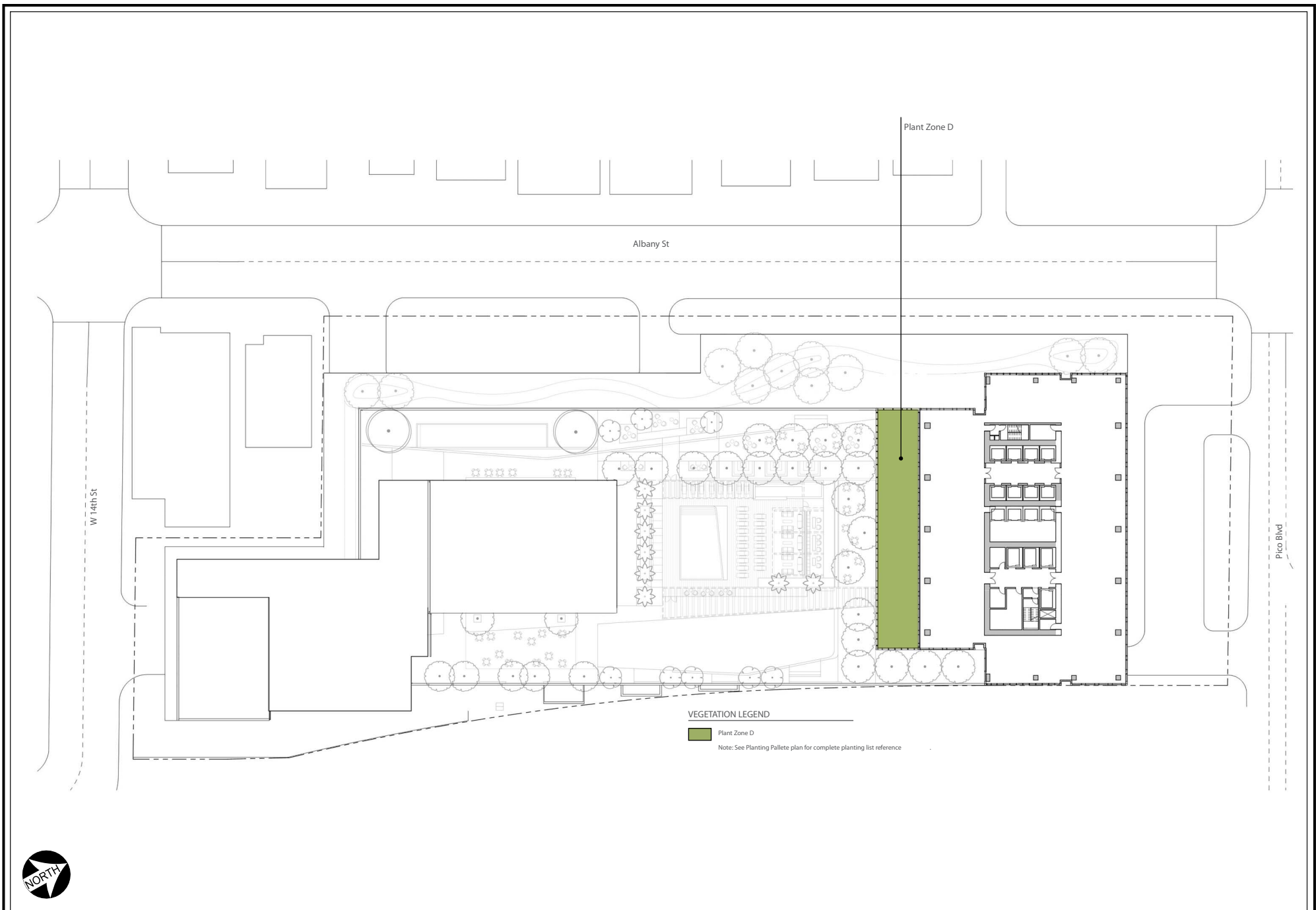




Figure 3-12  
Landscape Plan Level 4







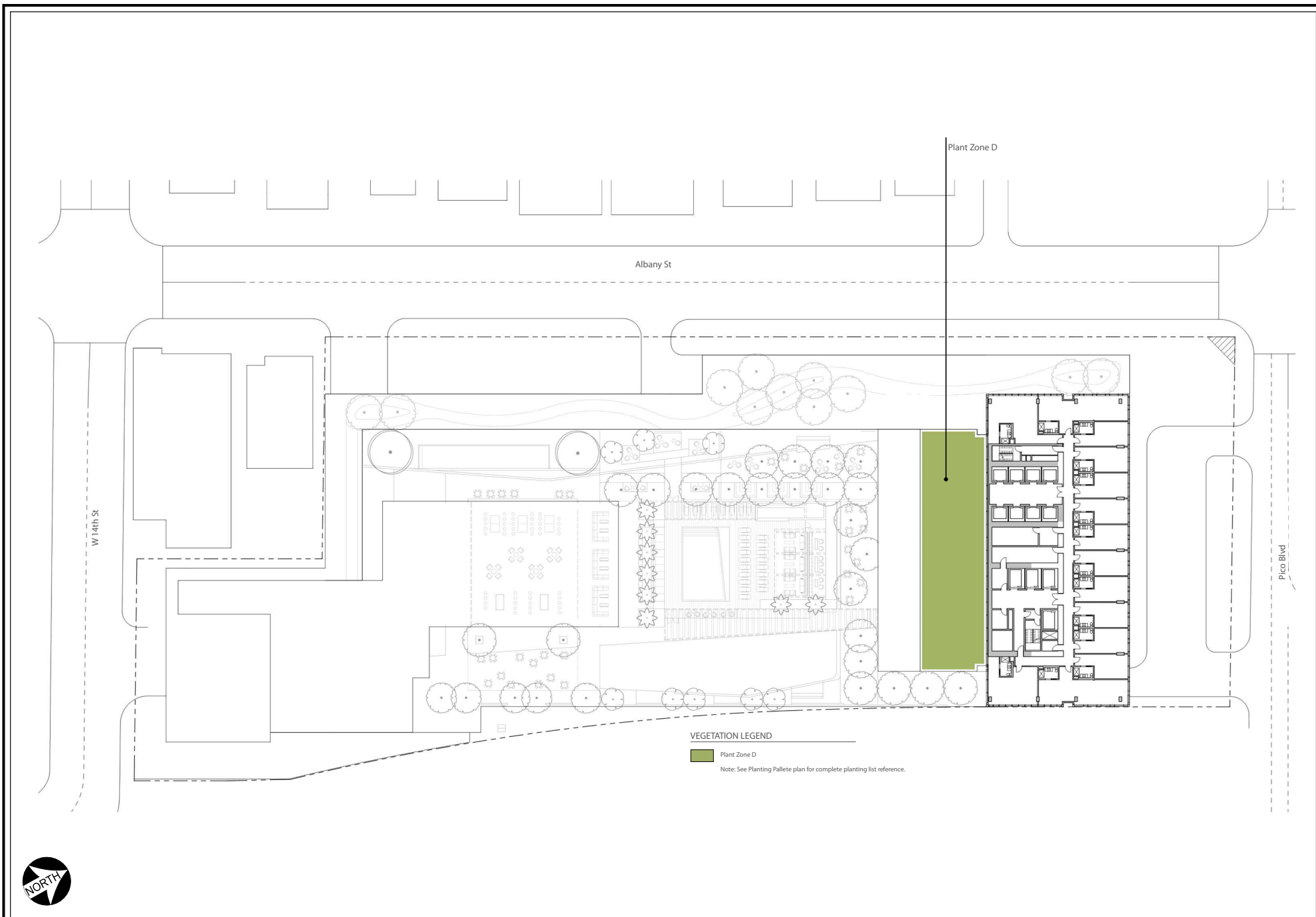
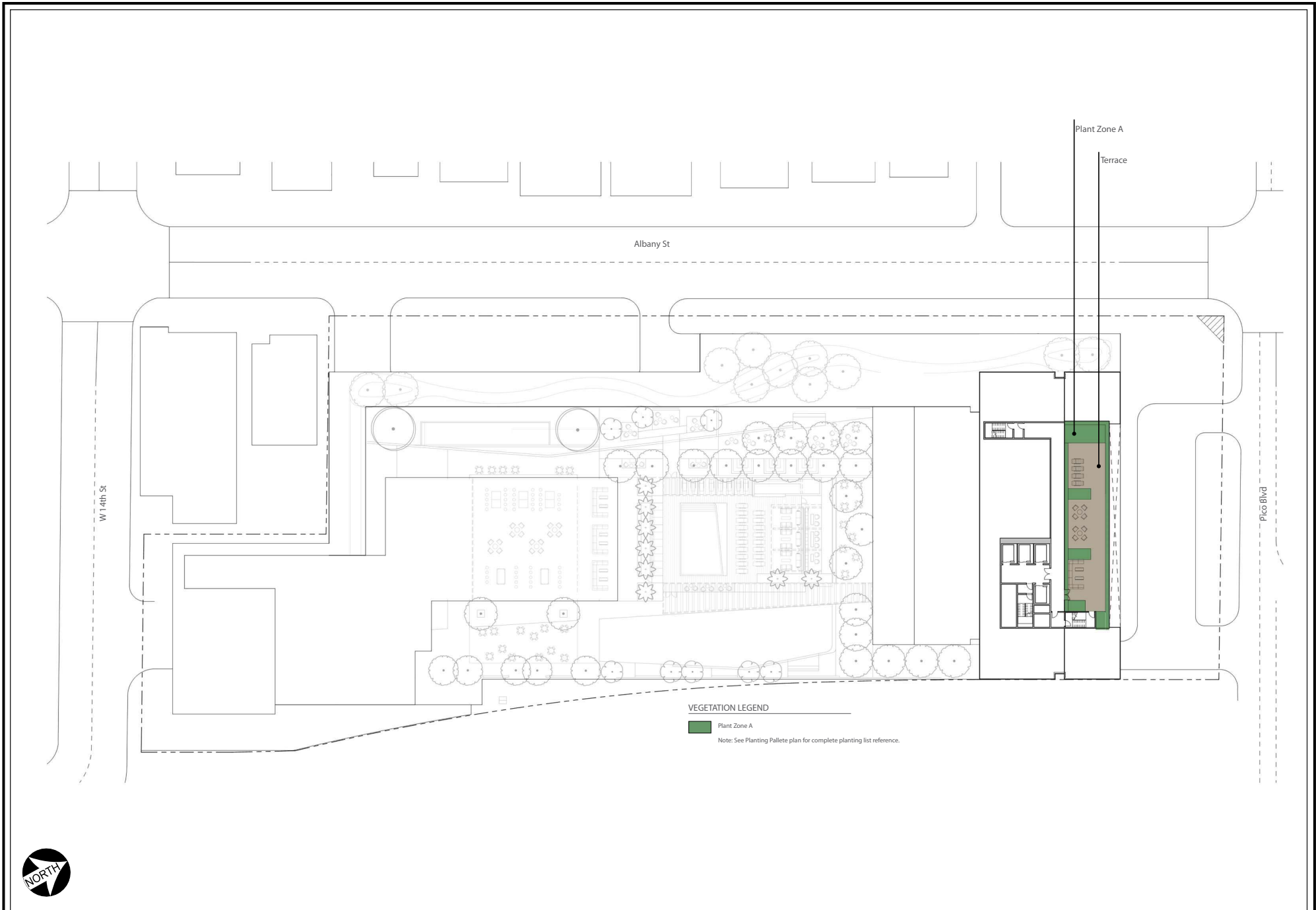


Figure 3-15  
Landscape Plan Level 34



### 3.3.4 Access, Circulation, and Parking

Regional access is provided by I-110 located adjacent to the Project Site. Local access is provided by Pico and Venice Boulevards.

Several transit services provide access near the Project Site, including Metro Bus Line 30 stops at the corner of Pico Boulevard and Albany Street, 90 feet west of the Project Site; Metro Bus Line 330 and LADOT DASH Pico Union/Echo Park stops at the intersection of Pico Boulevard and Union Avenue, approximately 1,000 feet west of the Project Site; Metro Bus Line 81 and LADOT Commuter Express 422 and DASH Downtown F stops at the corner of Pico Boulevard and Figueroa Street, 1,750 feet east of the Project Site; and Metro Blue and Expo Lines at the Metro Pico Station located on Pico Boulevard and Flower Street, 2,250 feet east of the Project Site.

The Metro Blue and Expo Lines provide access to the Metro Red/Purple Lines at 7th/Metro Center Station, which provides a connection to the Metro Gold Line at Union Station. The proximity of the Project Site to different Metro transit lines would encourage the use of transit by on-site hotel guests, retail and restaurant patrons, and employees.

Access to on-site parking would be provided through a driveway entrance on Albany Street, toward the southwest corner of the Project Site; a driveway entrance on Pico Boulevard, toward the northwest corner of the Project Site; and a driveway entrance on 14th Street, toward the southeast corner of the Project Site. The hotel would include a driveway roundabout drop-off and valet area, located off of Pico Boulevard. In addition, the Project would include a drop-off zone, located on Albany Street for all Project uses.

Pedestrian access to the hotel lobby would be from Pico Boulevard, adjacent to the roundabout drop-off area and additional access from the Albany Street drop-off zone.

The driveway entrances on Albany Street and Pico Boulevard are located toward the building's far corners to maximize the activated lobby and commercial uses fronting Albany Street and at the Albany Street and Pico Boulevard intersection. Servicing for the commercial, hotel, and convention uses is provided by an on-site loading dock, accessible from the proposed driveway entrances from Pico Boulevard or 14th Street. Vehicular traffic would be able to enter and exit the building from Albany Street, Pico Boulevard, and 14th Street.

The required and provided parking is shown in **Table 3-5, Vehicle Parking**. Of the 63,356 square feet of ballroom/meeting space, only 60,126 square feet is required to be parked. Pursuant to Los Angeles Department of Building and Safety (LADBS) policy, assembly rooms, such as meeting rooms, less than 750 square feet in size need not be parked.<sup>10</sup> Five of the smaller meeting rooms are less than 750 square feet and are, thus, not required to provide parking.

<sup>10</sup> ZA-1988-1405-ZAI

A total of 443 parking spaces would be provided on-site within four subterranean levels. The Project is requesting a Conditional Use Permit to allow a reduced vehicle parking requirement via a shared parking analysis.<sup>11</sup>

**Table 3-5  
Vehicle Parking**

Use	Amount	Rate	Total (spaces)
<b>Required</b>			
Restaurant	19,665 sf	1 space / 500 sf	39
Ballroom / Meeting	60,126 sf <sup>1</sup>	1 space / 35 sf	1,718
Spa	9,325 sf	1 space / 500 sf	19
Office	5,405 sf	1 space / 500 sf	11
Hotel	730 rooms	Rooms 1-30: 1 space / room Rooms 31-60: 1 space / 2 rooms Rooms >61 (670 rooms): 1 space / 3 rooms	268
<b>Total Required per LAMC</b>			<b>2,016</b>
<b>Required per Approval of Shared Parking CUP</b>			
Conventional Parking			443
<b>Total Provided</b>			<b>443</b>
sf = square feet <sup>1</sup> Floor area excludes meeting room less than 750 sf for parking calculation only. See Program Summary in Table 3-3 for total floor are by use. HOK, Plans, November 2019, included as Appendix A-1 to this IS.			

The required and provided bicycle parking per LAMC 12.21-A,4 and Bicycle Parking Ordinance No. 185,480 is shown in **Table 3-6, Bicycle Parking**. The Project would provide 209 short-term and 175 long-term bicycle parking spaces located adjacent to the public right-of-way on Pico Boulevard and Albany Street and within the proposed parking levels. Long-term bicycle parking spaces would be provided within an automated stacking structure within the proposed parking levels. The Project is also requesting a reduction of short-term bicycle parking requirements with a Zone Variance.

The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations.

**Table 3-6  
Bicycle Parking**

Use	Quantity	Short-term		Long-term	
		Rate	Amount	Rate	Amount
Required					
Restaurant	19,665 sf	1 space / 2,000 sf	10	1 space / 2,000 sf	10
Ballroom	60,126 sf	1 space / 350 sf	172	1 space / 700 sf	86
Spa	9,325 sf	1 space / 2,000 sf	5	1 space / 2,000 sf	5
Office	5,405	1 space / 10,000 sf	1	1 space / 5,000 sf	1
Hotel	730 rooms	1 space / 10 rooms	73	1 space / 10 rooms	73
Total			261		175

<sup>11</sup> Gibson Transportation, Shared Parking Study, October 16, 2019, included as Appendix A-3 to this IS.

Provided per Approval of a Council Legislative Action					
<b>Total</b>			<b>209</b>		<b>175</b>
sf = square feet HOK, <u>Plans</u> , November 2019, included as Appendix A-1 to this IS.					

### 3.3.5 Lighting and Signage

The Project would include low-level interior lighting visible through the windows of the ground-floor lobby; low-level accent lighting on the proposed building to highlight architectural features and signage; lighting associated with the outdoor spaces; low-level lighting on the roof deck at the top level of building; and low-level security, way-finding lighting and landscape lighting throughout the Project Site. All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light spillover onto off-site uses and would meet all applicable LAMC lighting standards.

All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to the approval of the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

The Project would include a comprehensive signage program that includes a mix of static tenant identification signs, wayfinding signs, pylon signs, digital signs, and supergraphic signs. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the building uses. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. Exterior lights would be directed onto signs to minimize off-site glare.

After approval by the City<sup>12</sup>, the Sign District would be implemented on the Project Site and certain surrounding parcels that make one complete city block. The approval would permit signage on and around the Project Site with lighting that is consistent with the proposed Sign District.

### 3.3.6 Site Security

During construction of the Project, temporary security measures, including security fencing, lighting, and locked entry would be implemented.

During operations, the Project would provide a security program to ensure the safety of its hotel guests and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to hotel room areas, lighting of building entryways and plaza areas, and video surveillance. The security program would include controlling access, monitoring entrances and exits of buildings, and monitoring fire/life/safety systems.

<sup>12</sup> City of Los Angeles Planning & Land Use Management, City Motion: [http://clkrep.lacity.org/online/docs/2018/18-0509\\_mot\\_09-04-2019.pdf](http://clkrep.lacity.org/online/docs/2018/18-0509_mot_09-04-2019.pdf), accessed February 11, 2020.

### 3.3.7 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC, effective January 1, 2020)<sup>13</sup> and the 2019 California Green Building Standards Code (CalGreen, effective January 1, 2020).<sup>14</sup>

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate stormwater generation on-site. Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

### 3.3.8 Anticipated Construction Schedule

Construction of the Project is expected to be completed in a single phase with overlapping activities. Construction is anticipated to commence in 2022, pending Project approval and EIR certification, with demolition of the existing building, followed by grading and excavation. The amount of materials exported will be up to 168,400 cubic yards.<sup>15</sup> The Project would contain four subterranean levels (approximately 43 feet in depth), in addition to any other excavation typically required for foundation and utility work. Building foundation would be laid, followed by building construction and architectural coatings, with full buildout anticipated in 2025.

A Haul Route program would be required as part of the City's permitting process. It is anticipated the export material would be transported to the Chiquita Canyon Landfill in Castaic. The estimated haul route is approximately 42 miles. Loading trucks would exit the Project Site on Pico Boulevard and head southeast, turn left onto LA Live Way and merge onto I-110 North, take the exit to US-101 North, take exit 11B to I-5 North, take exit 172 to CA-126 West, turn right to Chiquita Canyon Landfill. Empty trucks would exit the landfill and head east on CA-126, turn right onto I-5 South, merge onto CA-170 South, merge onto US-101, merge onto I-110 South, take exit 21 to merge onto I-10 West, turn right into Tobermann Street, turn right onto Venice, turn left onto Albany, turn right on Pico, turn right to Project Site.

## 3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The EIR 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

<sup>13</sup> City of Los Angeles Department of Building and Safety, Green Building, available at <http://ladbs.org/forms-publications/forms/green-building>, accessed on February 11, 2020.

<sup>14</sup> California Building Codes: <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo>, accessed on February 11, 2020.

<sup>15</sup> Proposed Haul Route for VTTM 82122, August 2019, included as Appendix A-4 to this IS.

entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6, a City-Initiated General Plan Amendment from “Commercial Manufacturing” to “Regional Center Commercial” and exemption from Footnote No. 2 of the Westlake Community Plan.
- Pursuant to LAMC Sections 12.32 A and 12.32 F, a City-Initiated Vesting Zone Change and Height District Change from CM-1 and CM-1-HPOZ to C2-4 zone.
- Pursuant to LAMC Section 12.20.3 F.3(d), a City-Initiated modification to the HPOZ boundary to remove a portion of the Project Site from the HPOZ.
- Pursuant to LAMC Sections 13.11 and 12.32 S, a City-Initiated Sign District on the Project Site and certain surrounding parcels.
- Pursuant to LAMC Section 16.05, a Site Plan Review for the development of 50 or more guest rooms or the development of 50,000 square feet or more of non-residential floor area.
- Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit for off-site and on-site sales and consumption of a full line of alcoholic beverages and live entertainment and dancing .
- Pursuant to LAMC Section 12.24 X.20, a Conditional Use Permit to permit reduced automobile parking requirements.
- Pursuant to LAMC Section 12.27, a Zone Variance to permit reduced short-term bicycle parking requirements.
- Pursuant to LAMC Section 17.01 et seq., a Vesting Tentative Tract Map No. 82122 for the merger of 20 lots into one master lot and subdivision of 17 airspace lots; and a haul route for the export of approximately 168,400 cubic yards of soil.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route permit, foundation permits, and building permits.



# INITIAL STUDY

## 4 ENVIRONMENTAL IMPACT ANALYSIS

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### I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 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 shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “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 File No. 2452 (ZI No. 2452) provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA.”<sup>1</sup>

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.

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<sup>1</sup> City of Los Angeles Department of City Planning, Zoning Information File No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

Except as provided in Public Resource Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 public 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, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest.

Scenic resources within the Project area that are available from public locations include the downtown Los Angeles skyline and Santa Monica Mountains. Existing valued views within the greater Project area could include focal views and panoramic views or vistas of identified visual resources. However, such views are limited, partial, distant, and/or non-existent due to the predominantly flat terrain and the dense, intervening development that blocks long-range, expansive views. Private views are not protected under CEQA. Surrounding views consist of the urban landscape occupied by commercial, residential, and office uses.

Under existing conditions, short-range views of the Project Site are already obstructed from most public vantage points and are generally only available to viewers at adjacent locations (i.e., pedestrians and motorists) along the streets surrounding the Project Site.

Development of the Project would demolish an existing three-story building and construct a 37-story (480 foot) building. The increased height and mass of the proposed building on the Project Site would be prominently visible from surrounding areas and therefore result in changes to short-range focal views. The Project would be prominently visible within short-range views from street-level vantage points adjacent to the Project Site, and block public views of other buildings in the vicinity of the Project Site. However, it would not block focal views of visual resources.

The development would be visible from more distant locations and could, as a result, intermittently block longer-range views of the downtown Los Angeles skyline and the Santa Monica Mountains. With regard to the downtown skyline, while the proposed building would intermittently block portions of the skyline as viewed from areas west of the Project Site, they would not completely obscure views of the skyline. With regard to the Santa Monica Mountains, as previously discussed, any such views are very limited and intermittent and are primarily only available from public roadways, not from across the Project Site. As such, this individual infill development would not block the broader views of the urban landscape from the Santa Monica Mountains.

Pursuant to Senate Bill 743, Public Resources Code Section 21099 and ZI No. 2452, the Project's impact on views and scenic vistas would not be considered significant. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.<sup>2</sup> There are also no City-designated scenic highways in the Project Site vicinity.<sup>3</sup>

The Project Site does not include protected trees.<sup>4</sup> In addition, the Project Site does not include rock outcroppings, or other natural features since the Project Site is already entirely developed with an existing building and paved surface parking. Therefore, the Project would not substantially damage scenic resources, including those located within a state or City-designated scenic highway.

Pursuant to Senate Bill 743, Public Resources Code Section 21099 and ZI No. 2452, the Project's impact on scenic resources would not be considered significant. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The Project Site is in an urbanized area of the City, in a commercial zone (CM-1 and CM-1-HPOZ), adjacent to other urban uses and I-110. As such,

<sup>2</sup> Caltrans, California Scenic Highways, website: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf>, accessed February 6, 2020.

<sup>3</sup> City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A5 – Central, East and Cornfield Arroyo Secco Plan (CASP) Subarea.

<sup>4</sup> PSOMAS, Tree Evaluation Report, May 23, 2018, included as Appendix B to this IS.

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

The Westlake Community Plan does not have policies with regard to scenic quality.<sup>5</sup>

The Project would replace the existing two-story commercial building and surface parking with a mixed-use development consisting of 37-story hotel tower and five-story podium with integrated parking and commercial uses. The tower would rise to a height of 480 feet above grade, and the Project would provide up to approximately 722,005 square feet of floor area, comprised of hotel and commercial uses. The baseline visual character of the surroundings is dominant to urban core elements such as infrastructure, regional sports and entertainment venues, the numerous high-rise towers of downtown Los Angeles and the South Park district to the east, and low-rise residential and commercial buildings east of the Project Site in the Pico-Union neighborhood. The Project would alter the existing urban visual character of the Project Site and its surroundings by increasing the height and density of on-site development in a manner that is consistent with baseline surrounding conditions and in process development projects.

Pursuant to Senate Bill 743, Public Resources Code Section 21099 and ZI No. 2452, the Project's potential to conflict with applicable zoning and other regulations governing scenic quality would not be considered significant. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The Project Site is in the highly urbanized Pico-Union neighborhood of Los Angeles and adjacent to the Los Angeles Convention Center and the Los Angeles Sports and Entertainment District (LASED), which is an active regional entertainment and mixed-use district. The LASED is separated from the Project Site by I-110. The surrounding uses include commercial and office uses to the north across Pico Boulevard; retail, restaurant, and residential uses to the west across Albany Street; residential and parking lot uses to the south across 14<sup>th</sup> Street; and a parking lot and I-110 adjacent to the west.

At night, surrounding development generates moderate to very high levels of ambient lighting related to special events, existing signs and advertising, architectural and landscaping/decorative lighting, and security. Static and animated illuminated signage, streetlights, and traffic on local streets also contribute to the high ambient light levels in the area. The Project would add to existing ambient nighttime light levels through the introduction of new architectural lighting, security lighting, visible interior illumination associated with ground-level commercial uses, and a comprehensive signage program including wayfinding signs and on-site signs. Signs include illuminated signage and digital display signs. Some lighting elements would be visible from nearby off-site vantages, including residential uses west and south of the Project Site.

<sup>5</sup> Westlake Community Plan: <http://cityplanning.lacity.org/complan/pdf/wlkcptxt.pdf>, accessed February 11, 2020.

A City-initiated sign district would be implemented on the Project Site and certain adjacent parcels. The proposed boundary of the sign district encompasses the Project Site and the properties adjacent to the Project Site on the same block, which includes the off-site single-family home (1350 Albany Street) and church (1356 Albany Street). This proposed sign district is bounded on the west by Albany Street, on the north by Pico Boulevard, on the south by 14<sup>th</sup> Street, and on the east by I-110. The sign district would permit signage on and around the Project that is generally consistent with the signage of the nearby downtown Los Angeles sign districts, such as the LASED and the Figueroa and Pico Sign District. The Sign District would permit signage opportunities on the Project Site that would enhance the built and pedestrian environment with static signs and pylons, as well as digital signs with rotating graphics and messages. At this conceptual level, the Project proposes a mix of static tenant identification signs, wayfinding signs, pylon signs, digital signs, and supergraphic signs. No signage is proposed on the off-site properties as part of the Project.

After approval and adoption by the City, the Sign District would be implemented on the Project Site and certain adjacent parcels that comprise one complete city block. The proposed boundary of the sign district encompasses the Project Site and the properties adjacent to the Project Site on the same block, which include the off-site single-family home (1350 Albany Street) and church (1356 Albany Street). This proposed sign district is bounded on the west by Albany Street, on the north by Pico Boulevard, on the south by 14<sup>th</sup> Street, and on the east by I-110, as shown in **Figure 3-2**. The Project's proposed signs and sign lighting would be required to comply with the requirements and terms of the proposed Sign District once approved by the City.

**Therefore, pursuant to SB 743, Public Resources Code Section 21099, and ZI File No. 2452, impacts related to the light and glare during the Project's construction and operation would not be considered significant.**

## II. AGRICULTURE AND FOREST RESOURCES

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

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 located in a highly developed area and zoned for commercial manufacturing land uses. The Project Site is not included in the Prime Farmland, Unique

Farmland, or Farmland of Statewide Importance category.<sup>6</sup> Similarly, the Project Site does not currently contain any agricultural uses. As such, the Project would not convert farmland to a non-agricultural use. Therefore, no impacts would occur, and no further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in a highly developed area and zoned for commercial manufacturing land uses (CM-1 and CM-1-HPOZ). The Project Site is not zoned for agricultural uses. The Project Site is not under a Williamson Act contract.<sup>7</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no further evaluation of this topic in an EIR is 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.** In the City, forest land is a permitted use in areas zoned OS (Open Space). The Project Site is not zoned OS, as discussed in Section 2.b. In addition, the Project Site does not contain any forest land, timberland, or timberland zoned Timberland Production.<sup>8</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in a highly developed area and zoned for commercial manufacturing land uses. The Project Site is entirely developed with a building and associated surface parking lot and is located in a developed area of the City. No forest land exists on or in the vicinity of the Project Site.<sup>9</sup> Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

**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?**

<sup>6</sup> State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017 : <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed February 11, 2020.

<sup>7</sup> State of California Department of Conservation, Division of Land Resource Protection, Williamson Act Contract Land, , published 2016: [https://www.conservation.ca.gov/dlrp/wa/Pages/stats\\_reports.aspx](https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx), accessed February 11, 2020.

<sup>8</sup> US Forest Service: <https://www.fs.usda.gov/detailfull/angeles/maps-pubs/?cid=FSEPRD535505&width=full>, accessed February 11, 2020.

<sup>9</sup> US Forest Service: <https://www.fs.usda.gov/detailfull/angeles/maps-pubs/?cid=FSEPRD535505&width=full>, accessed February 11, 2020.

**No Impact.** The Project Site is located in a highly developed area and zoned for commercial manufacturing land uses. The Project Site is entirely developed and located in a developed area of the City, and no agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, the Project would not result in the conversion of farmland to nonagricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is 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.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead<sup>10</sup>). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>11</sup> With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse

<sup>10</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

<sup>11</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment (ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>) under an applicable federal or state ambient air quality standard?**

**Potentially Significant Impact.** Development of the Project has the potential to generate air quality emissions, which can contribute to cumulative impacts when assessed in conjunction with related projects that are approved, under construction, or reasonably foreseeable to occur within the greater Project area. The Project's air quality emissions analysis would evaluate six criteria pollutants: volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), particulate matter with less than 10 microns diameter (PM<sub>10</sub>), and particulate matter with less than 2.5 microns diameter (PM<sub>2.5</sub>). The SCAQMD has indicated that if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or state ambient air quality standard. The Air Basin is currently in non-attainment of federal air quality standards for ozone, PM<sub>2.5</sub> and lead, and State air quality standards for ozone, particulate matter less than 10 and 2.5 microns in size (PM<sub>10</sub> and PM<sub>2.5</sub>).

As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. Therefore, this topic will be evaluated in an EIR.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** In addition to the SCAQMD's regional significance thresholds, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants. The SCAQMD developed mass-based localized significance thresholds (LSTs) that are the amount of pounds of emissions per day that can be generated by a project that would not cause or contribute to adverse localized air quality impacts. These localized thresholds, which are identified in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD, apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The daily on-site construction emissions generated by the Project are analyzed against the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality resulting in impacts to sensitive receptors. Land uses that are considered more sensitive to air pollution than others include hospitals, schools, residences, playgrounds, childcare centers, athletic facilities, and retirement homes.<sup>12</sup>

<sup>12</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, Figure 5-1, April 1993.

The Project's localized air quality emissions will be quantified and analyzed in relation to the SCAQMD's localized significance thresholds to determine whether air emissions could have potential impacts on sensitive receptors. This topic will be evaluated in the EIR, which will provide a comprehensive analysis of the potential impacts the Project could have on sensitive receptors and disclose the potential pollutant concentrations, within a certain radius of the Project Site.

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

**Less Than Significant Impact.** Project-related significant adverse effect could occur if construction or operation of a project would result in other emissions that could lead to objectionable odors affecting a substantial number of people. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Site. The Project would use typical construction techniques, and the odors would be typical of most construction sites and temporary and intermittent in nature.

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402.

According to the SCAQMD CEQA Air Quality Handbook<sup>13</sup>, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project would involve the construction and operation of a hotel, which includes land uses that are not typically associated with odor complaints according to the SCAQMD. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions.

On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control and would not result in substantially adverse odor impacts. In addition, the Project would not include an open-air loading dock, which could have the potential to emit objectionable odors. Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>14</sup>

Based on the above, in compliance with existing regulatory requirements, the potential odor impact during construction and operation of the Project would be less than significant, and no further analysis of this topic in the EIR is required.

<sup>13</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993.

<sup>14</sup> SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed June 27, 2018.

## IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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"/>

- 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?**

**No Impact.** The Project Site is located in an urbanized area and is currently fully developed with a vacant office building and parking. Due to the urbanized and disturbed nature of the Project Site and the surrounding developed areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. According to Exhibit C-2 of the L.A. CEQA Thresholds Guide, the

Project Site and surrounding area are not identified as a biological resource area.<sup>15,16</sup> Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.<sup>17</sup>

Thus, based on the lack of habitat on the Project Site, special status species listed by the California Department of Fish and Wildlife (CDFW)<sup>18</sup> or by the U.S. Fish and Wildlife Service (USFWS)<sup>19</sup> would not be anticipated to be present on-site.

Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity. Similarly, the Project Site is not located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state- or federally-listed species.

Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS, and no further evaluation 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.** The Project Site is occupied by a vacant office building and parking. No riparian habitat or other sensitive natural community exists on or adjacent to the Project Site.<sup>20,21</sup> In addition, there are no other sensitive natural communities identified by the DCFW or the USFWS.<sup>22</sup>

Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no further evaluation of this topic in the EIR is required.

**c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal**

<sup>15</sup> City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area).

<sup>16</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

<sup>17</sup> Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-Net public, website: [http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET\\_Public.GIS-NET\\_Public](http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public), accessed: April 8, 2019.

<sup>18</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2017.

<sup>19</sup> United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>, accessed October 8, 2019.

<sup>20</sup> U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed June 27, 2018.

<sup>21</sup> NavigateLA, Water, Lakes, and Streams layer: <http://navigate.lacity.org/navigate/>, June 27, 2018.

<sup>22</sup> California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), [www.wildlife.ca.gov/Data/BIOS](http://www.wildlife.ca.gov/Data/BIOS), accessed June 27, 2019; California Department of Fish and Wildlife, CDFW Lands, <https://www.wildlife.ca.gov/Lands>, accessed June 27, 2019; U.S. Fish and Wildlife Service, National Wetlands Inventory, [www.fws.gov/wetlands/index.html](http://www.fws.gov/wetlands/index.html), accessed June 27, 2019.

**pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** The Project Site is entirely developed with impermeable surfaces and does not contain any water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act.<sup>23</sup> Review of the National Wetlands Inventory identified no wetlands or water features on the Project Site.<sup>24</sup>

As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no further evaluation of this topic in the EIR is required.

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

**Less Than Significant Impact.** The Project Site is located in an urbanized area and is currently occupied by a vacant office building and parking. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors, as explained above.

The on-site trees that would be removed during construction of the Project may provide nesting sites for migratory birds. However, in the unlikely event nesting sites are found, the Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. The MBTA protects migratory nongame native bird species (as listed in 50 CFR Section 10.13) and their nests. Additionally, Section 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 non-game birds (as listed under the MBTA). Tree removals would be undertaken pursuant to applicable City permits and requirements.

Based on the above, the Project would not 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. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These tree species are

<sup>23</sup> U.S. Environmental Protection Agency, NEPAassist, [www.epa.gov/nepa/nepaassist](http://www.epa.gov/nepa/nepaassist), accessed June 27, 2019.

<sup>24</sup> U.S. Fish & Wildlife Service, National Wetlands Inventory: <https://www.fws.gov/wetlands/data/mapper.html>, accessed June 27, 2019.

defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City’s Protected Tree Ordinance and are not considered protected. The City’s Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree [...]” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Trees that are designated as “protected trees” as defined by Section 17.02 of the LAMC include oak trees (*Quercus spp.*), Southern California black walnuts (*Juglans californica*), western sycamores (*Platanus racemosa*), and California bay laurels (*Umbellularia californica*) that have a trunk diameter at breast height at least four inches. No “protected trees”, as defined in the LAMC, occur in the survey area.

As identified in the Tree Evaluated Report prepared for the Project Site, none of the trees are protected species under the City of Los Angeles Native Tree Protection Ordinance. The five existing on-site trees, 14 existing street trees, and three off-site trees (located immediately outside the Project Site boundaries but are analyzed in case they are affected by project development) would be removed to accommodate the development of the Project.

On-site trees would be replaced on a 1:1 basis in accordance with the Department of City Planning’s policy. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, any removed street trees would be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division and would require approval of the Board of Public Works.

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no further evaluation of this topic in the EIR is 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.** The Project Site is located in an urbanized area and is currently occupied by an existing vacant office building and parking. The Project Site does not support any habitat or natural community.<sup>25-26</sup> No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans are applicable to the Project Site.<sup>27</sup>

Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in the EIR is required.

<sup>25</sup> ZIMAS search: <http://zimas.lacity.org/>.

<sup>26</sup> US EPA, NEPAassist: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 8, 2019.

<sup>27</sup> California Department of Fish and Wildlife, Natural Community Conservation Plan summaries: <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>, accessed February 11, 2020.

## V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 as defined in State CEQA Guidelines §15064.5?**

**Potentially Significant Impact.** Section 15064.5 of the CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The Project Site is developed with an office building constructed in the late 1960s. A banknote production business occupied the building until the 1990s. The Los Angeles Unified School District (LAUSD) used the building for administrative offices from 2002 to 2015. The building has been vacant since 2016.<sup>28</sup>

The southern two-thirds of the existing building at the Project Site is located within the boundary of the Pico-Union Historic Preservation Overlay Zone (HPOZ) and is designated as a non-contributing structure.

The Pico-Union HPOZ is generally bounded by 11<sup>th</sup> Street and Olympic Boulevard to the north, Union Avenue and I-110 to the east, Washington Boulevard and I-10 to the south, and Hoover Street to the west. The Pico-Union HPOZ consists of 798 structures, 528 of which are "contributing" to the significance of the area and the remaining 270 are classified as "non-contributing structures." The area was found to be significant for its concentration of residential

<sup>28</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.



properties “dating from the late 19<sup>th</sup> century through the early 1930s.”<sup>29</sup> Most residential buildings across from and adjacent to the Project Site were constructed by 1906 and are designed in a Craftsman style. While “contributing” structures were constructed during the period of significance of the HPOZ, “non-contributing structures” were constructed during a different period or no longer retain features that identify it from the period of significance. Projects located within an HPOZ require a Certificate of Appropriateness (for contributing structures) or Certificate of Compatibility (non-contributing structures). However, on March 28, 2018, the City Council adopted a motion to initiate the process to amend the boundaries of the HPOZ to remove said portion of the Project Site from the HPOZ.<sup>30</sup> Therefore, a Certificate of Compatibility is not required.

The Project could have the potential to cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5. Therefore, The EIR will evaluate the HPOZ boundary amendment and impacts to the HPOZ, as well as the direct and indirect impacts to historic resources that would result from the development of the Project adjacent to the HPOZ.

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

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to 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 located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. However, the Project would include four subterranean levels (approximately 43 feet below grade), in addition to any other excavation typically required for foundation and utility work. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will analyze if the Project could cause a substantial adverse change in the significance of an archaeological resource.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area and developed with an existing building and parking. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered

<sup>29</sup> Los Angeles City Planning Commission, City Plan Case No. 2002-6297-HPOZ, June 17, 2004, pages 3-4: <https://planning.lacity.org/pdiscaseinfo/Home/GetDocument/ODY1MmU1YWQtdODkzNi00MmZjLTg3Y2MtZTQzZGUxYzY0Mzcw0>.

<sup>30</sup> Council Action March 27, 2018, File No. 18-0164, included as Appendix A-2 to this IS.

during Project construction, particularly during ground-disturbing activities, such as excavation for the proposed four subterranean levels. While the uncovering of human remains is not anticipated, if human remains are inadvertently discovered during excavation, such discovery would be treated in accordance with State law, including CEQA Guidelines Section 15064.5(e), PRC Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the 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.

Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no further evaluation of this topic in the EIR is 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 all 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.

With respect to Project operations, the Project would obtain electricity from the Los Angeles Department of Water and Power (LADWP), which has committed to diversify its portfolio of energy sources to achieve 35 percent renewables by 2020. The Project would obtain natural gas from Southern California Gas Company (SoCalGas). Furthermore, the Project would be designed and constructed to meet all applicable LAGBC standards. The Project would include Energy-Star-rated appliances and install energy efficient boilers, heaters, and air conditioning systems. As the Project would be developed to meet or exceed the energy efficiency standards of the LAMC, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy sources.

However, Appendix F of the State CEQA Guidelines provides that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Therefore, the energy use and conservation features of the Project will be further analyzed in the scope of the EIR.

- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**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 (Senate Bill 350), the CARB's "In-Use Off-Road Diesel Fueled Fleets Regulation" and "Advanced Clean Cars Program," California Energy Efficiency Standards for

Residential and Nonresidential Buildings (Title 24, CCR Part 6), and the California Green Building Standards Code (CALGreen, CCR Part 11).

Local plans adopted for the purposes of promoting energy efficiency include the City of Los Angeles Sustainable City pLAn, the LAGBC, the LADWP 2017 Power Strategic Long-Term Resource Plan. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.<sup>31</sup>

The Project would be construction in accordance with all applicable laws and regulations, including 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, Appendix F of the State CEQA Guidelines provides that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Therefore, a discussion of the Project's consistency with State or local plans for renewable energy or energy efficiency will be further analyzed in the scope of the EIR.

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<sup>31</sup> CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.

## VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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.** Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone.<sup>32</sup> According to the CGS, the Project Site is not located in an Earthquake Fault Zone.<sup>33</sup>

Therefore, since there are no known faults beneath the Project Site, the Project would not exacerbate existing environmental conditions such that rupture of a known earthquake fault would occur because of the Project. Furthermore, even though the Project would involve excavation for the subterranean parking levels, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust.

Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions and impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

## ii. Strong seismic ground shaking?

<sup>32</sup> Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 27, 2019. The City's ZIMAS website lists the Project Site as within a fault zone of the Puente Hills Blind Thrust. However, the Preliminary Geotechnical Assessment for the Project disputes this information and identifies the closest segment of the Puente Hills Blind Thrust to be approximately 2.51 miles to the south of the Project Site. In addition, the City's NavigateLA website lists an unnamed northwest-southeast trending fault located approximately 0.82 mile to the northeast of the Project Site. The fault source is listed as the CGS digital database of Fault Activity Map of California. However, after reviewing the CGS website, the Fault Activity Map does not show this unnamed fault. Based on the research in the Preliminary Geotechnical Assessment, the presence of a fault could not be corroborated or verified with other references. Therefore, the designated fault need not be considered in the design of structures within the development. As demonstrated above, while ZIMAS shows the Project Site in a fault zone, the information from CGS shows otherwise. Therefore, the conclusion is based on the expert agency (CGS).

<sup>33</sup> <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed June 27, 2019.

**Less Than Significant Impact.** The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake. However, as previously stated in Response to Checklist Question No. VII.a.i above, no active faults are known to pass directly beneath the Project Site according to the CGS, and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking due to the Project. In addition to any other excavation typically required for foundation and utility work, the depth of excavation for the proposed four subterranean levels would be approximately 43 feet below grade. Accordingly, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions, such as strong seismic ground shaking.

However, engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. A final design-level geotechnical report will be prepared by the Applicant and reviewed to the satisfaction of the Los Angeles Department of Building and Safety (LADBS) before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project.

Based on the Geotechnical Assessment<sup>34</sup>, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code (CBC) with City amendments. The 2016 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report.

In addition, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the LABC. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

Based on the above, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental

<sup>34</sup> Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

conditions. Impacts would be less than significant, and no further analysis of this topic in the EIR is required.

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion.

The historically highest groundwater level is estimated at 85 feet below grade. Static groundwater was not encountered during exploration of nearby sites to an exposed depth of 130 feet below grade.<sup>35</sup> Accordingly, the City of Los Angeles does not classify the Project Site as part of a potentially liquefiable area<sup>36</sup> or as a liquefaction zone as classified by the State of California.<sup>37</sup> The Seismic Hazards Map of the State of California does not classify the Project Site as within a liquefiable area.<sup>38</sup>

Soils on the Project Site are primarily silty sands, with sand and gravel evident.<sup>39</sup> Development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking.<sup>40</sup> Thus, not all three conditions are met (i.e., shallow groundwater, sandy soils, and strong ground motion) that could cause liquefaction. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction.

As such, impacts associated with liquefaction would be less than significant, and no further evaluation of this topic in the EIR is required.

### iv. Landslides?

**No Impact.** Landslides generally occur in loosely consolidated, wet soil, and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography.<sup>41</sup> There is an estimated elevation difference of approximately 4 feet across the Project Site sloping down gently to the southwest.<sup>42</sup>

The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area, or a landslide area, as mapped by City of Los Angeles.<sup>43</sup> In addition, the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project does not propose creating any steep slopes, and, as such, the Project Site would remain

<sup>35</sup> Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

<sup>36</sup> Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 27, 2019.

<sup>37</sup> <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed June 27, 2019.

<sup>39</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

<sup>40</sup> <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed June 27, 2019.

<sup>41</sup> Site visit and observation, May 2019.

<sup>42</sup> <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed June 27, 2019.

<sup>43</sup> Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 27, 2019.



flat. Therefore, the Project would not exacerbate existing conditions that would result in landslides. Accordingly, no impact would occur, and no further evaluation of this topic in the EIR is required.

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

**Less Than Significant Impact.** The Project Site is currently fully developed with a vacant office building and parking. As such, there are no open spaces with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion.

Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

Furthermore, as discussed below in Response to Checklist Question IX.a., the Project would be required to comply with the City's Low Impact Development (LID) Ordinance and implement best management practices (BMPs), as well as standard erosion controls to limit stormwater runoff, which can contribute to erosion.

Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed, except for typical landscaping, which would include ground cover and trees to prevent soil erosion.

Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no further analysis of this topic in the EIR is required.

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

**Less Than Significant Impact.** No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general project vicinity. Therefore, the Project Site is not located on a geologic unit or soil that is unstable. Project construction would not cause a geologic unit or soil to become unstable because it is a typical project with standard construction procedures. In addition, as discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. As such, the Project would not exacerbate existing conditions, such as unstable geologic units or unstable soil.

In addition, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, liquefaction is unlikely at the Project Site. Furthermore, there is no evidence of natural or manmade voids or low density soils that could lead to ground subsidence or collapse.

As such, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The existing site soils encountered during this investigation are considered to have a very low to moderate expansive potential.<sup>44</sup> In addition, the Project Site and immediate vicinity are fully developed, so no soil would be exposed to water and swell. Finally, the Project does not propose to expose the underlying soils permanently or inject soils with water that could cause it to swell. Therefore, the Project would not exacerbate any existing environmental conditions that could create substantial risk to life or property due to expansive soil.

In addition, through standard construction practices involving excavation activities and the associated removal of underlying soils (which have a very low to moderate expansive potential), as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed.

Furthermore, the Project would comply with the LABC, and all on-site grading and site preparation would comply with the applicable provisions of the LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills.

As such, impacts related to expansive soils would be less than significant, and no further evaluation of this topic in the EIR is required.

**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 within a community served by existing wastewater infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. The Project would not require the use of septic tanks or alternative wastewater disposal systems.

Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no further evaluation of this topic in the EIR is required.

<sup>44</sup> Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

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

**Less Than Significant Impact.** Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to prior grading and development. Therefore, surficial paleontological resources that may have existed at one time have likely been previously disturbed.

In addition, a paleontological records search conducted by the Los Angeles County Natural History Museum for the Project Site included in **Appendix C-2** of this Initial Study indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site.

Based on the records search, the Project Site area has surface deposits composed of younger Quaternary Alluvium, derived as either alluvial fan deposits from the slightly more elevated terrain to the northeast or as overbank deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel just to the east. These younger Quaternary deposits usually do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may contain significant vertebrate fossils.

The closest vertebrate fossil locality from the older Quaternary deposits is LACM 1755, just southeast of the Project area near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse (*Equus*) at a depth of 43 feet below the street. The next closest vertebrate fossil locality in older Quaternary Alluvium is LACM 1893, just south west of the Project area in a cut for the Santa Monica Freeway (I-10) just east of Gramercy Place, that produced fossil specimens of mammoth (*Mammuthus*) and bison (*Bison antiquus*). The next closest vertebrate fossil locality from older Quaternary deposits beneath the younger Quaternary Alluvium is probably LACM 2032, northeast of the Project area near the intersection of Mission Road and Daly Street near the Golden State Freeway (I-5), that produced fossil specimens of pond turtle (*Clemmys mamorata*), ground sloth (*Paramylodon harlani*), mastodon (*Mammut americanum*), mammoth (*Mammuthus imperator*), horse (*Equus*), and camel (*Camelops*) at a depth of 20 to 35 feet below the surface.

In summary, the paleontological records search indicates that shallow excavations in the younger Quaternary Alluvium exposed throughout the Project area are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the Project area that extend down into older Quaternary deposits, however, may well encounter significant vertebrate fossils.

As discussed above, grading to a maximum depth of approximately 43 feet would occur within the Project Site in order to develop the Project. Thus, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present.

Pursuant to the City's Condition of Approval for an Inadvertent Discovery, in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, with compliance with City's Condition of Approval for an Inadvertent Discovery with regard to paleontological resources, the Project's impact on paleontological resources would be less than significant, and no further analysis of this topic in an EIR is required.

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. No impact related to unique geologic features would occur, and no further evaluation of this topic in the EIR is required.

## VIII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.** Global climate change describes alterations in weather features (e.g., temperature, wind patterns, precipitation, and storms) that occur across the Earth as a whole. Global temperatures are modulated by naturally occurring components in the atmosphere (e.g., water vapor, carbon dioxide, methane, and nitrous oxide) that capture heat radiated from the Earth's surface, which in turn warms the atmosphere. This natural phenomenon is known as the "greenhouse effect." Gases that trap heat in the atmosphere are called greenhouse gases (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects the earth's temperature. The State has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California.

Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, this topic will be analyzed in the EIR.

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

**Potentially Significant Impact.** As the Project would have the potential to emit GHGs, the EIR will include further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, this topic will be analyzed in the EIR.

## IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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"/>
g. 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"/>
h. 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"/>

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

**Less Than Significant Impact.** The Project would include the demolition of a 150,257-square-foot existing building and the construction of a hotel project with up to 730 guest rooms and approximately 722,005 square feet of new floor area. Construction of the Project could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. Based on the findings of the Phase I Environmental Site Assessment (ESA)<sup>45</sup>, some of the materials surveyed and sampled on-site do contain asbestos containing material (ACM).

<sup>45</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

Disturbance of any ACM would be handled in accordance with applicable local and State regulations, which include SCAQMD Rule 1403 and California's Division of Occupational Safety and Health (Cal/OSHA) Asbestos Construction Standard Title 8 CCR 1529.

In addition, lead-based paint (LBP) was detected on certain surfaces tested. Disturbance of any LBP materials would be handled in accordance with California Department of Public Health (CDPH) regulations in residential or public buildings and the U.S. Department of Housing and Urban Development (HUD) and 2010 Toxic Substances Control Act (TSCA) Renovation, Repair and Painting Rule (RRP). Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead.

The original occupant of the building and subsequent business were both banknote production companies that occupied the two-story building from construction in the late 1960s until the 1990s. Records and observations indicated "printing presses, inks, dyes and paper pressing operations were used," and the company "manufactured their own printing plates on site." Two clarifiers had been installed inside the building, a sump and floor drain system was in use, and a small pit for holding inks and dyes, an empty aboveground diesel tank, and an emergency generator were located outside the east wall of the building.

Based on the research completed and the results of the two subsurface investigations, it does not appear that significant hazardous waste conditions are present.<sup>46</sup> However, it is recommended that the two clarifiers and the pit be removed and/or properly abandoned, and the aboveground tank and unused diesel generator be removed from the Project Site. Otherwise, no further action would be necessary at this time.<sup>47</sup> The removal of on-site clarifiers, aboveground tanks, and generators would be conducted according to the regulatory requirements of the U.S. Environmental Protection Agency (USEPA) and California Department of Toxic Substance Control (DTSC).

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

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

The types and amounts of hazardous materials that would be used in connection with Project operation would be typical of those used in other mixed-use developments (e.g., cleaning

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<sup>46</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

<sup>47</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

solvents, painting supplies, batteries, etc.). Significant hazards are not anticipated as long as hazardous materials are used and disposed of in accordance with manufacturers' instructions and handled in compliance with applicable federal and State Occupational Safety and Health Acts (i.e., the Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law). Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant, and no further evaluation 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.**

**Methane**

The Project Site is located in a Methane Zone.<sup>48</sup> These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems. The City requires the following for projects located within a Methane Zone: prior to the issuance of a building permit, the Applicant will be required to have the Project Site to be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC. The engineer will be required to measure subsurface soil gas concentrations and pressures of methane at the Project Site and investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level, which will prevent potential methane gas seepage into the building.<sup>49</sup> The Applicant will be required to implement the engineer's design recommendations subject to the California Division of Oil, Gas, and Geothermal Resources (DOGGR), LADBS and LAFD plan review and approval.

Construction workers would be protected from methane exposure through compliance requirements regulated by Cal/OSHA.

**Asbestos**

Due to the age of the building on the Project Site, there is a potential that ACMs are present. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The Project would be required to comply with

<sup>48</sup> ZIMAS search: <http://zimas.lacity.org/>.

<sup>49</sup> LADBS, Methane Mitigation Standards: <https://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigation-standards>, accessed February 11, 2020.



SCAQMD Rule 1403 to ensure proper removal of ACMs during demolition activities.<sup>50</sup> Disturbance of any ACM would be handled in accordance with applicable local and State regulations, which include SCAQMD Rule 1403 and Cal/OSHA Asbestos Construction Standard Title 8 CCR 1529.

## **Lead**

Due to the age of the building on the Project Site, there is a potential that LBP is present. Cal/OSHA regulations require that specific work practices be implemented when handling construction materials and debris that contain lead-containing materials. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 Code of Federal Regulations (CFR) 1910.1025 and 1926.62. Local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by HUD.<sup>51</sup>

## **Polychlorinated Biphenyl**

Polychlorinated biphenyls (PCBs) were historically used as coolants and lubricants in transformers, capacitors, and other electrical equipment beginning in 1929 because they do not burn easily and serve as a good insulating material. Although the DTSC is a lead regulatory agency for site cleanups in California, engagement with the U.S. EPA is required when addressing PCB-contaminated sites. Since Toxic Substances Control Act (TSCA) PCB regulations are not delegated, U.S. EPA is the regulatory lead for the cleanup of PCBs under the TSCA PCB cleanup requirements in 40 CFR 761. Due to the age of the on-site structures, there is the potential that fluorescent light ballasts in fixtures contain PCBs. The ballasts do not represent a recognized environmental concern but should be handled in accordance with 40 CFR 761 upon demolition or renovation.

## **Underground Storage Tanks (UST)**

Compliance with the following regulations will ensure the safe removal of any potential USTs: Los Angeles Fire Code, Division 5 and 31<sup>52</sup>; California Health & Safety Code, Division 20, Chapter 6.7<sup>53</sup>; CCR, Title 23, Division 3, Chapter 16<sup>54</sup>; and LAMC Article 7 of Chapter V, Section 120, 2301 and 5003.

<sup>50</sup> SCAQMD Rule 1403: <http://www.aqmd.gov/home/rules-compliance/compliance/asbestos-demolition-removal>, accessed February 11, 2020.

<sup>51</sup> Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing: [https://www.hud.gov/program\\_offices/healthy\\_homes/lbp/hudguidelines](https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines), accessed February 11, 2020.

<sup>52</sup> LAFD UST Tank Abandonment Guidelines: <https://www.lafd.org/fire-prevention/cupa/ust-tank-abandonment-guidelines> accessed February 11, 2020.

<sup>53</sup> Underground Storage of Hazardous Substances: [https://www.waterboards.ca.gov/ust/regulatory/docs/hs6\\_7.pdf](https://www.waterboards.ca.gov/ust/regulatory/docs/hs6_7.pdf) accessed February 11, 2020.

<sup>54</sup> Underground Storage Tank Regulations: [https://www.waterboards.ca.gov/ust/regulatory/docs/ccr\\_title23div3chapt16.pdf](https://www.waterboards.ca.gov/ust/regulatory/docs/ccr_title23div3chapt16.pdf) accessed February 11, 2020.

The following five listings are the known sources of contamination indicated to be within the critical 1/4-mile radius of the Project Site:

- One spill site:
  - The nearest site is a Convention Center parking lot 500 feet to the east (1206 Pico Boulevard), which is still indicated to be an active investigation/cleanup site (since at least 2008) under regulatory supervision by L.A. County Department of Public Health.
- One former CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) site:
  - A former CERCLIS Superfund Enterprise Management System (SEMS) investigation for the U.S. Food and Drug Administration (FDA) 700 feet to the northwest (1521 Pico Boulevard) was deemed to require no further action according to the USEPA.<sup>55</sup> The site was listed as a laboratory with waste chemicals. The site was demolished and developed with apartment buildings in 2012.
- Three leaking USTs (LUST):
  - The nearest LUST site is a former gasoline leak at the Convention Center beyond 800 feet to the east-northeast (1201 Figueroa Street). It was a dispenser leak that impacted soil only and the case related to leaks and contamination was closed on August 13, 1998.<sup>56</sup>
  - The next nearest case is a dispenser leak of diesel fuel nearly 1/4 mile to the northwest (1612 Pico Boulevard) and the case related to leaks and contamination was closed on August 23, 2018.<sup>57</sup>
  - The third is a gas station release that impacted soil only 1/4 mile to the northeast (1312 11th Street) and the case related to leaks and contamination was closed on January 28, 2016.<sup>58</sup>

All of the other sites are beyond 1/4 mile away and nearly all have been remediated and closed. The nearest active case is 2,000 feet to the north (1600 Olympic Boulevard) and under remediation.<sup>59</sup> All of these sites appear too distant and lack adequate significance to present a realistic risk of impairment to the Project Site.

## Phase I

<sup>55</sup> <https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0908587>, accessed October 10, 2019.

<sup>56</sup> Geotracker: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0603700551](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0603700551), accessed October 14, 2019.

<sup>57</sup> Geotracker: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T10000005398](https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000005398), accessed October 14, 2019.

<sup>58</sup> Geotracker: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0603700549](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0603700549), accessed October 14, 2019.

<sup>59</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

The Phase I Environmental Site Assessment (ESA)<sup>60</sup> has revealed no evidence of a Recognized Environmental Condition (REC) associated with the Project Site.

There are Environmental Issues (EI), defined as environmental concerns that warrant discussion but do not qualify as recognized environmental conditions as defined by the American Society for Testing and Materials (ASTM) Standard Practice E1527-13. The EIs are the following:

- Two clarifiers had been installed inside the building, a sump and floor drain system was in use, and a small pit for holding inks and dyes and an emergency generator were located outside the east wall of the building.

### **Subsurface Soil Vapor Study**

A soil vapor survey was conducted across the Project Site in May 2017, which detected no VOCs (volatile organic compounds) in the 12 locations sampled. Based on the research completed and the results of the two subsurface investigations, it does not appear that significant hazardous waste conditions are present. However, it is recommended that the two clarifiers and the pit be removed to accommodate the proposed excavation and subterranean parking levels, and the aboveground tank and unused diesel generator be removed from the Project Site. Otherwise, no further actions would appear necessary at this time.<sup>61</sup> The removal of on-site clarifiers, aboveground tanks, and generators would be conducted according to the regulatory requirements of the USEPA and DTSC.

Vapor samples were analyzed for Total Petroleum Hydrocarbons (TPH) as gasoline and a complete scan of common industrial VOCs. The results of the vapor samples indicated no detectable concentrations of any of the compounds of concern. It does not appear that significant hazardous waste conditions associated with the former uses (banknote printing) of the Project Site is present throughout the areas investigated. Accordingly, no further actions are necessary at this time.<sup>62</sup>

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no further evaluation 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?**

<sup>60</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

<sup>61</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

<sup>62</sup> Centec Engineering, Soil Vapor Survey, May 25, 2017, included as Appendix D-2 to this IS.

**Less Than Significant Impact.** Saito High School, located at 1403 South Union Avenue, is approximately 1,100 feet (0.21 mile) west of the Project Site.<sup>63</sup> This school is a charter vocational school for young adults aged 17-24.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of developments, including vehicle fuels, paints, oils, and transmission fluids. The Project has the potential to emit potentially hazardous materials, substances or waste during the construction period as discussed above regarding ACMs, LBPs, and other construction related activities that could emit hazardous emissions. Significant impacts from these activities would not occur because of regulatory compliance requirements.

Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the Project Site vicinity.

In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Additionally, truck haul routes during construction of the Project would likely be along Pico Boulevard and trucks would not travel on streets directly adjacent to Saito High School.

While the Project would be operational during school hours, the Project would use, at most, minimal amounts of hazardous materials for routine cleaning and maintenance. In addition, there are intervening structures and roadways between Saito High School and the Project Site. Therefore, impacts of hazardous materials within one-quarter mile of a school would be less than significant, and no further analysis of this topic in the EIR is 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.** California Government Code Section 65962.5 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 California 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

<sup>63</sup> Saito High School is a charter school for young adults aged 17-24: <https://www.laedcorps.org/the-education-corpssaito-high-school.html>, accessed February 11, 2020.

information regarding the Cortese List is now compiled on the websites of the California 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 or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites. According to EnviroStor, there are no cleanup sites, permitted sites, leaking underground fuel tank (LUFT) cleanups on the Project Site.<sup>64</sup>

GeoTracker is the State Water Resources Control Boards' data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal Sites. According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites, WDR (Waste Discharge Requirements) sites, permitted UST facilities, monitoring wells, or DTSC cleanup sites or hazardous materials permits on the Project Site.<sup>65</sup>

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit,<sup>66</sup> and there are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.<sup>67</sup> Further, the Project Site is not subject to corrective action pursuant to the Health and Safety Code as it has not been identified as a hazardous waste facility.<sup>68</sup>

The Phase I Assessment has revealed no evidence of a Recognized Environmental Concern (RECs) in connection with the Project Site. A review of known cases of contamination found within a one-mile radius of the Project Site found no reasons to suspect any off-site sources of contamination are adversely impacting the Project Site.<sup>69</sup>

As discussed above under **Underground Storage Tanks (UST)** header in Hazards and Hazardous Materials Checklist Question IX.b, the nearest active case is 2,000 feet to the north

<sup>64</sup> California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed June 27, 2019.

<sup>65</sup> California State Water Resources Control Board, website: <https://geotracker.waterboards.ca.gov>, accessed June 27, 2019.

<sup>66</sup> California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>, accessed June 27, 2019.

<sup>67</sup> California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, accessed June 27, 2019.

<sup>68</sup> California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>, accessed June 27, 2019.

<sup>69</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

(1600 Olympic Boulevard) and under remediation.<sup>70</sup> All of these sites appear too distant and lack adequate significance to present a realistic risk of impairment to the Project Site.

There are no National Priorities List (NPL) or state “Superfund” sites or other significant sources of contamination in the vicinity.

As such, the Project would not exacerbate existing conditions. Therefore, impacts would be less than significant, and no further evaluation of this topic in the EIR is 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.** A significant impact may occur if a project is located within two miles of a public airport and subject to a safety hazard. The Project is not within an airport hazard area.<sup>71</sup> The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX)<sup>72</sup> located 9.5 miles southwest, Santa Monica Airport located 10 miles west, Bob Hope-Burbank Airport located 9 miles north. Accordingly, the Project would not expose residents or people working in the Project area to noise levels from aircraft. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

#### **Less Than Significant Impact.**

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route.<sup>73</sup> The nearest disaster route is Figueroa Boulevard, approximately 1,800 feet east of the Project Site.<sup>74</sup>

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. As such, Project-related construction activities would not occur within or adjacent to the City-designated disaster routes.

<sup>70</sup> Centec Engineering, Phase I Environmental Site Assessment, June 28, 2017, included as Appendix D-1 to this IS.

<sup>71</sup> ZIMAS search: <http://zimas.lacounty.gov/>.

<sup>72</sup> Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, June 2012, website: [http://planning.lacounty.gov/assets/upl/project/ALUC\\_Airports\\_June2012\\_rev2d.pdf](http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf), accessed June 27, 2019.

<sup>73</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

<sup>74</sup> <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf> accessed February 11, 2020.

With regard to operation, the Project does not propose the permanent closure of any local public streets or the primary access to the Project Site. In addition, the Project would not install barriers that would impede access in the vicinity of the Project Site. The Project would comply with LAFD access requirements to ensure safety during an emergency.

Therefore, construction and operation of the Project would not have the potential to interfere with access to and along the aforementioned City-designated disaster routes or impair the implementation of the City's emergency response plan. Impacts would be less than significant, and no further evaluation of this topic in the EIR is 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 an urbanized area within the City of Los Angeles and not in a Very High Fire Hazard Severity Zone.<sup>75</sup> The Project Site does not contain any wildlands fire hazard terrain.<sup>76</sup> In addition, there are no wildlands adjacent to the Project Site. Therefore, the Project would not exacerbate existing conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impacts would occur, and no further evaluation of this topic in the EIR is required.

<sup>75</sup> ZIMAS search: <http://zimas.lacity.org/>.

<sup>76</sup> Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed February 11, 2020.

## X. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 result in flooding on- or offsite;	<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 type="checkbox"/>	<input checked="" 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"/>

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

**Less Than Significant Impact.** The following analysis considers the Project's potential impacts on both surface water and ground water quality.

### Surface Water Quality

#### Construction

Construction activities for the Project include demolition of an existing commercial building and parking, excavation to approximately 43 feet below grade for foundation and subterranean



parking, building construction, and hardscape and landscape around the structure. During Project construction, particularly during the excavation and grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur.

However, as Project construction would disturb more than one acre of soil, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. With the implementation of site-specific BMPs included as part of the SWPPP and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no further evaluation of this topic in an EIR is required.

### ***Operation***

Operation of the Project would introduce sources of potential water pollution that are typical of developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products, such as oil leaks in parking and vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use or biofiltration planter BMPs as established by the LID Manual. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are

not anticipated to cause an exceedance of regulatory standards. The implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. The Project would not violate any water quality standards or waste discharge requirements through compliance with these regulatory requirements for stormwater and non-stormwater discharges (i.e., implementation of LID standards and best management practices). Therefore, impacts to surface water quality during operation would be less than significant, and no further evaluation of this topic in the EIR is required.

## **Groundwater Quality**

### ***Construction***

The historically highest groundwater level is estimated at 85 feet below grade. Static groundwater was not encountered during exploration of nearby sites to an exposed depth of 130 feet below grade.<sup>77</sup> The Project would require excavation to a depth of 43 feet. Therefore, the Project is not expected to affect groundwater and dewatering is not expected.

The groundwater is too deep to be affected by any contaminated soil. In addition, there are no RECs on the Site. In the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166<sup>78</sup>, which addresses VOC emissions from decontamination of soils.

In addition, while unlikely, the Phase I ESA concluded there are no oil wells on the Project Site. Although, the Project Site is adjacent to an Oil Drilling District, there is no oil drilling in the vicinity or Project Site. If any previously abandoned and unknown oil wells are located, the wells would be unearthed and inspected by the DOGGR to assess and prescribe abandonment procedures based on their observed condition. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil or oil wells.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into the groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into the groundwater.

<sup>77</sup> Preliminary Geotechnical Assessment, Geotechnologies, Inc., August 20, 2018, included as Appendix C to this IS.

<sup>78</sup> SCAQMD Rule 1166: <http://www.aqmd.gov/home/rules-compliance/compliance/rule-1166-site-specific-and-various-locations-soil-mitigation-plan>, accessed October 8, 2019.

In addition, as there are no existing groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells.<sup>79</sup>

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no further evaluation of this topic in an EIR is required.

### **Operation**

Operational activities, which could affect groundwater quality, include spills of hazardous materials and LUSTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in minimal impact to groundwater. Other types of risks, such as LUSTs have a greater potential to affect groundwater. The Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

In addition, the Project includes the installation of a stormwater capture and use system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater.<sup>80</sup> Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no further evaluation of this topic in an EIR is 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.** The Project Site is primarily covered with approximately 90% impervious surface<sup>81</sup>, either from surface parking or the existing vacant building. There is ornamental landscaping on the northern end of the Project Site along Pico Boulevard and street trees along Albany Street. The Project would include landscaping areas on Pico Boulevard, Albany Street, and within the roundabout drop-off areas. These landscaped areas would absorb some rain and reduce the amount of runoff that currently flows into the storm drain instead of recharging the local groundwater. The assumed average imperviousness of the Project Site would be approximately 90 percent once all landscaping and hotel pool amenities are

<sup>79</sup> Los Angeles County Public Works, Wells: <https://dpw.lacounty.gov/general/wells/>, accessed February 11, 2020.

<sup>80</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

<sup>81</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

installed.<sup>82</sup> The Project would maintain the permeability of the Project Site as compared to the paved existing conditions.

The historically highest groundwater level is estimated at 85 feet below grade. Static groundwater was not encountered during exploration of nearby sites to an exposed depth of 130 feet below grade.<sup>83</sup>

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is 90% impervious under existing conditions.<sup>84</sup> Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. With implementation of the Project, pervious surfaces would be increased due to the increase in landscaping. However, the underground footprint of the Project's subterranean parking levels would span the overall Project Site, and, therefore, the groundwater recharge potential would remain minimal. As such, operation of the Project would not affect or interfere with the ability for groundwater recharge to occur. Furthermore, as discussed above in Response to Checklist Question X.a, in accordance with the City's LID Ordinance, the Project would include BMPs to treat stormwater on-site.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that it would impede sustainable ground water management of the basin. Therefore, impacts on groundwater would be less than significant, and no further evaluation of this topic in the EIR is 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.** Construction activities associated with the Project, which would involve removal of the existing building and grading and excavation to a depth of 43 feet, have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable.

The Los Angeles County Department of Public Works (LACDPW) Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. While the Project Site is 90% impervious<sup>85</sup> under existing conditions and would remain so under post-development conditions, the Project would increase the amount of

<sup>82</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

<sup>83</sup> Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

<sup>84</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

<sup>85</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

landscaped areas on the Project Site, which would reduce the percentage of stormwater runoff from the Project Site. The slight reduction in stormwater runoff due to Project landscaping would slightly reduce peak flow rates during a 50-year storm event. Thus, the Project would not increase the stormwater flows from the Project Site.

Additionally, during operation, the Project would implement BMPs to ensure compliance with LID requirements. The Project includes the installation of a stormwater capture and use system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater.<sup>86</sup> A Final Plan Check as part of the permit process with LADBS would also ensure that there is adequate storm drain capacity available for the Project. The Applicant would be responsible for providing necessary infrastructure to serve the Project if it is determined to be necessary during the ministerial permitting process.

The Project Site is 90 percent impervious under existing conditions. With implementation of the Project, pervious surfaces would remain at 90 percent.<sup>87</sup> As such, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas.

The proposed stormwater flows would continue to drain to Albany Street and would not change the existing drainage pattern. With implementation of a stormwater capture and use system (i.e., harvesting system for on-site irrigation use), the volume of water leaving the Project Site would be reduced from the existing flows, as shown in **Table 4-1, Existing and Proposed Peak Runoff Flows**. The Project would not alter the overall drainage pattern of the Project Site, and there are no streams or rivers on or near the Project Site.

**Table 4-1**  
**Existing and Proposed Peak Runoff Flows**

Storm Event	Existing $Q_{Total}$ [cfs]	Proposed $Q_{Total}$ [cfs]	% Reduction
5-Year	3.68	3.06	-17%
10-Year	4.81	4.31	-10%
25-Year	6.38	6.10	-4%
50-Year	7.27	7.07	-3%
100-Year	8.90	8.04	-10%
cfs = cubic feet per second Includes reduction from LID implementation (subtracting the 85th Percentile storm flow of 0.86 cfs) PSOMAS, <u>Water Resources Technical Report</u> , July 17, 2018, included as Appendix E of this IS.			

Based on the above, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site

<sup>86</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

<sup>87</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

flooding would occur. Therefore, impacts would be less than significant, and no mitigation further evaluation of this topic in the EIR is 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.** The existing site drainage flows west to Albany Street via sheet flow to the curb and gutter system. The runoff enters the City storm drain system at a catch basin at the corner of Albany and 14th Streets located at either the southeast corner of Albany and 14th Streets.<sup>88</sup> The storm drain system includes a 33-inch concrete pipe line in 14th Street.<sup>89</sup> As shown in **Table 4-1** above, the Project would decrease runoff from the Project Site since the volume of water leaving the Project Site will be reduced from the existing flows.<sup>90</sup>

The Project would remove the existing vacant building and parking to develop the hotel with additional landscaping. The Project would include the installation of private catch basins, planter drains, and roof downspouts throughout the Project Site to collect roof and site runoff, and direct stormwater to the LID system through a series of underground storm drain pipes. This on-site stormwater conveyance system would serve to prevent on-site flooding and nuisance water build-up on the Project Site.

Flows would be accommodated by the existing stormwater and conveyance system. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no further evaluation of this topic in the EIR is 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.** The Project would maintain the 90% of impervious surfaces within the Project Site and would therefore not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems.

While the Project Site is 90% impervious under existing conditions, the Project would increase the amount of landscaped areas on the Project Site, which would increase the permeable surfaces on the Site and reduce the percentage of stormwater runoff from the Project Site. The slight reduction in stormwater runoff due to Project landscaping would slightly reduce peak flow rates during a 50-year storm event. Thus, the Project would not increase the stormwater flows from the Project Site. Additionally, during operation, the Project would implement BMPs to ensure compliance with LID requirements.

<sup>88</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

<sup>89</sup> Navigate LA, City of Los Angeles, Stormwater Information layer: <https://navigatea.lacity.org/navigatea/>, accessed October 16, 2019.

<sup>90</sup> PSOMAS, Water Resources Technical Report, July 17, 2018, included as Appendix E of this IS.

In terms of polluted runoff, the proposed uses would be typical of commercial-related operations and would not introduce substantial sources of polluted water that an industrial operation would introduce. In addition, the implementation of BMPs required by the City's LID Ordinance would target pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements.

As such, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system or provide substantial sources of polluted runoff. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

#### **iv. Impede or redirect flood flows?**

**No Impact.** A 100-year flood is defined as a flood which results from severe rainstorm with a probability of occurring approximately once every 100 years. According to the Federal Emergency Management Agency (FEMA), the Project Site is not located within an area designated as a 100-year flood hazard area.<sup>91</sup> The Site is not located within a City-designated 100-year or 500-year flood plain.<sup>92</sup> The Project would not place housing within a 100-year flood hazard area. The Project Site is located in an urbanized area of downtown Los Angeles, and there are no rivers, streams, or other water bodies that could flood flow on or through the Project Site. Therefore, the Project would not impede or redirect flows. No Project impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** A tsunami is a series of waves caused by earthquakes or undersea volcanic eruptions.<sup>93</sup> 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.

The Project Site is not located within an area potentially impacted by a tsunami, which is typically located along the coast of the Pacific Ocean, which is located approximately 12.75 miles west of the Project Site.<sup>94</sup>

There are no major water-retaining structures located immediately upgradient from the Project Site. Therefore, flooding from a seismically-induced seiche is considered unlikely.

The Project Site is not located within an area designated as a 100-year flood hazard area.<sup>95</sup> In addition to the low risk of flooding, the Project includes LID requirements for capture and use

<sup>91</sup> NavigateLA, FEMA Flood Hazard layer: <http://navigatea.lacity.org/navigatea/>, May 8, 2018.

<sup>92</sup> City of Los Angeles, Safety Element of the General Plan, 100-Year and 500-Year Flood Plains, Exhibit F.

<sup>93</sup> National Ocean Services: <https://oceanservice.noaa.gov/facts/tsunami.html>, accessed February 11, 2020

<sup>94</sup> Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/safetyelt.pdf>, accessed February 11, 2020.

and/or biofiltration system and a stormwater conveyance system. This would improve conditions at the Project Site, which is currently devoid of stormwater treatment and on-site detention systems. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Therefore, no tsunami or seiches would be expected to impact the Project Site that would risk release of pollutants due to Project inundation. No impacts would occur, and no further evaluation of this topic in the EIR is required.

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

**Less Than Significant Impact.** Potential pollutants generated by the Project would be typical of hotel and commercial land uses and may include sediment from landscaping soil, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. 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 Construction General 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. The Project would comply with LID standards for infill development. The Project would include a stormwater capture and use system.

Stormwater currently discharges from the Project Site without treatment or on-site detention. Thus, the Project's LID BMPs would minimize the release of anticipated and potential pollutants generated by the Project. As the Project would maintain the amount of impervious area, implementation of the LID BMP measures on the Project Site would result in an improvement in surface water quality runoff when compared to existing conditions.

Therefore, with compliance with existing regulatory requirements and implementation of LID BMPs, 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, and no further evaluation of this topic in an EIR is required.

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<sup>95</sup> NavigateLA, FEMA Flood Hazard layer: <http://navigatea.lacity.org/navigatea/>, May 8, 2018.



## XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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?

**Less Than Significant Impact.** The Project Site is currently developed with a three-story office building and parking. The Project Site is located in a highly urbanized area characterized by low- and medium-rise buildings occupied by commercial/retail uses, offices, and multi-family residences. There is no existing residential use on the Project Site or a residential use that would be physically separated or otherwise disrupted by the Project because the proposed development would remain within the boundary of the existing Project Site. There are no vacant or undeveloped areas around the Project Site, such that development of the Project could possibly divide an established community or result in a separation of uses or disruption of access between land uses around the Project Site.

Implementation of the Project would result in further infill of an already developed community and on a site that is already built out with a three-story office building. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. Lastly, the Project does not propose a freeway or other large infrastructure or barrier that would divide a community.

Therefore, the Project would not physically divide, disrupt, or isolate an established community. Impacts would be less than significant, and no further analysis of this topic in the EIR is 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.** SCAG's 2016 RTP/SCS (Regional Transportation Plan/Sustainable Communities Strategies) is a long-range visioning plan that balances future mobility and housing needs with goals for the environment, regional economy, social equity and environmental justice, and public health. The Project Site is located within the Westlake Community Plan Area, and Transit Priority Area. The Project Site is partially located within the boundary of the Pico-Union Historic Preservation Overlay Zone (HPOZ).

The Project Site is zoned CM-1 (Commercial Manufacturing, Height District 1) and CM-1-HPOZ (Historic Preservation Overlay Zone). The total floor area contained in a building on a lot in Height District No. 1 is limited to 1.5 times the buildable area of the lot (FAR 1.5:1). The proposed FAR for the Project is 6.45:1. The entitlements associated with the Project, including but not limited to, a General Plan Amendment and Zone Change, would establish and maintain vertical consistency between the General Plan and zoning in applicable planning documents.

The EIR will review the 2016 RTP/SCS, General Plan, Westlake Community Plan, and other applicable plans to determine if the Project conflicts with any of the applicable goals, objectives, or policies that are applicable to the Project and that have been adopted for the purpose of avoiding or mitigation an environmental effect. Therefore, this topic will be analyzed in the EIR.

## XII. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 and b).** The Project Site is not located within a City-designated Mineral Resource Zone (MRZ) and is not used for mineral extraction.<sup>96</sup>

However, the Project Site is partially located within the boundaries of an oil field (LA Downtown Oil Field).<sup>97</sup> The Project Site is fully developed, and no oil wells are present.<sup>98</sup> The nearest oil well was drilled approximately 1,380 feet to the east of the Project Site.<sup>99</sup> Since the Project would not involve mineral extraction activities, the Project would not affect any extraction activities or any existing or future regionally important mineral extraction sites.

As no mineral resources exist on the Project Site, the Project would not result in the loss of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in the EIR is required.

<sup>96</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.

<sup>97</sup> City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996 and Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

<sup>98</sup> City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>. California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed February 11, 2020.

<sup>99</sup> Geotechnologies, Inc., Preliminary Geotechnical Assessment, August 20, 2018, included as Appendix C-1 to this IS.

### XIII. Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
e. 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 construction equipment during grading, hauling, establishing of building foundations, installation of utility lines and services, and other construction activities. Thus, the potential exists for construction noise to be generated in excess of the noise standards established by the City. The Project's construction noise would be compared to the ambient noise measurements recorded at the Project Site and compared to the noise level standard set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) to determine whether the construction activities generate excess noise levels.

Operational noise impacts would occur from the increase in vehicular activity to and from the Project Site and from stationary point sources, such as building mechanical equipment, loading areas, and outdoor open spaces areas. Operational noise levels would also be estimated and compared to the existing ambient noise levels and compared to thresholds to determine whether Proposed Project adheres to the City's Noise Element and Noise Ordinance. Sensitive receptors identified in the area that may be impacted from construction and operational noise include residential uses to the west and south within 500 feet of the Project Site. Therefore, impacts may be potentially significant and further evaluation of this topic will be provided in the EIR.

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

**Potentially Significant Impact.** Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and in the United States is referenced as vibration decibels (VdB). The City has not adopted regulations for construction groundborne vibration impacts. Accordingly, for purposes of this analysis the Federal Transit Administration's (FTA) adopted vibration standards for assessing potential building damage and annoyance, would be used to evaluate potential impacts related to project construction and operation.

Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, and construction truck travel. The construction of the Project would involve heavy equipment and demolition activities which have the potential to generate groundborne vibration. As such, the Project would have the potential to generate, affect adjacent historic structures, and expose people to excessive groundborne vibration and noise levels during short-term construction activities.

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

Therefore, impacts may be potentially significant and further evaluation of this topic will be provided in the EIR.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip or two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 9.5 miles southwest, Santa Monica Airport located 10 miles west, Bob Hope-Burbank Airport located 9 miles north. The Project Site is not within the Airport Influence Area of any of the listed airports.<sup>100</sup> The Project would not expose residents to excessive noise levels from aircraft. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

<sup>100</sup> Los Angeles County Airport Land Use Commission, Airport Influence Areas, website: [https://data.lacounty.gov/Property-Planning/Airport-Influence-Area/dk4z-eiqh?category=Property-Planning&view\\_name=Airport-Influence-Area](https://data.lacounty.gov/Property-Planning/Airport-Influence-Area/dk4z-eiqh?category=Property-Planning&view_name=Airport-Influence-Area), accessed February 11, 2020.

## XIV. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.** While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project. In addition, no new permanent residents would be generated during construction of the Project, which could induce substantial population growth. The Project would not include the extension of new roads or propose new infrastructure that could indirectly induce population growth.

The growth projections in the Southern California Association of Governments (SCAG) 2016–2040 RTP/SCS (Regional Transportation Plan/Sustainable Communities Strategy) reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area.<sup>101</sup> The Project Site is located in SCAG's City of Los Angeles Subregion.

According to the adopted 2016-2040 RTP/SCS, employment in the City of Los Angeles is 1,831,457 employees in 2020 (baseline year) and 1,915,868 employees in 2025 (buildout year) values.<sup>102</sup> This represents a growth of 84,411 employees.

<sup>101</sup> [http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS\\_DemographicsGrowthForecast.pdf](http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf), accessed February 11, 2020.

<sup>102</sup> Based on the adopted 2016-2040 Regional Transportation Plan by SCAG. Employment data calculated based on linear interpolation of 2020 and 2025 values. The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012 for the baseline and buildout years.

According to the City of Los Angeles Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.<sup>103</sup> As the Project does not include any residential units, the Project would generate no new residents.

Employee generation is shown in **Table 4-2**. It is estimated that the Project would generate a total of approximately 1,176 employees; however, the number of employees that would be on-site at any given time would be less since they would work by shift and be dependent on other operational needs).

**Table 4-2**  
**Project Estimated Employee Generation**

Land Use	Size	Generation Rates	Total Employees
Hotel <sup>1</sup>	624,254 sf	1 employee / 882 sf	708
Ballrooms/Meeting Rooms <sup>2</sup>	63,356 sf	1 employee / 209 sf	303
Spa <sup>3</sup>	9,325 sf	1 employee / 209 sf	45
Office <sup>4</sup>	5,405 sf	1 employee / 209 sf	26
Restaurant and Bars <sup>5</sup>	19,665 sf	1 employee / 209 sf	94
<b>Project</b>			<b>1,176</b>
<p>Note: sf = square feet  Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 14.  <sup>1</sup> Lodging land uses, which is 882 sf per employee.  <sup>2</sup> There is no ballroom/meeting room rate. These uses often feature service staff and setup crew that could be part of the hotel staffing. However, for a worse-case conservative scenario, this assumes the highest rate of employment per sf rate on LAUSD's generation table. Therefore, the standard commercial office rate of 209 sf per employee is used.  <sup>3</sup> There is no spa rate. These uses function as service spaces, similar to retail uses. However, for a worse-case conservative scenario, this assumes the highest rate of employment per sf rate on LAUSD's generation table. Therefore, the standard commercial office rate of 209 sf per employee is used.  <sup>4</sup> Office land uses, which is 209 sf per employee.  <sup>5</sup> There is no restaurant and bar rate. However, for a worse-case conservative scenario, this assumes the highest rate of employment per sf rate on LAUSD's generation table. Therefore, the standard commercial office rate of 209 sf per employee is used.  Table: CAJA Environmental Services, October 2019.</p>			

The 1,176 employees generated by the Project would represent approximately 1.4 percent of the 84,411 employees that represents the projected growth in the City of Los Angeles between 2020 and 2025 (i.e., the Project's baseline and buildout years). Therefore, Project-related employment generation would be within and, thus, consistent with SCAG's employment

Employment between 2012 (1,696,400) and 2040 (2,169,100) is projected to grow by 472,700 over the 28-year period, or 16,882.14 per year average.

<sup>103</sup> Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

forecasts for the City of Los Angeles. Impacts relating to employees would be less than significant.

The Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant, and no further evaluation of this topic in the EIR is required.

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

**No Impact.** As no housing currently exists on the Project Site, the Project would not displace any existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impacts would occur, and no further evaluation of this topic in the EIR is 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 for the Project Site. The Project Site is served by LAFD Station No. 10, located at 1335 S. Olive Street, which is located approximately 0.75 mile from the Project Site. The Project is a hotel building with a maximum of 730 keys and related commercial/retail space. Thus, the Project would potentially increase the demand for fire protection services. At this time, it is undetermined whether the Project would increase demand to the extent that a new facility would need to be constructed to maintain acceptable service ratios, the construction of which might result in adverse physical impacts. Therefore, further analysis of this topic will be included in the EIR.

### b) Police protection?

**Potentially Significant Impact.** The Los Angeles Police Department (LAPD) provides police protection for the Project Site. The Project Site is located in LAPD's Central Bureau and is served by the Rampart Police Station, located at 1401 W. 6th Street, approximately 1.3 miles from the Project Site. The Project is a hotel building with a maximum of 730 keys and related commercial/retail space. Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Additionally, the development of the Project could result in an increase of on-site patrons and employees, thereby generating a potential increase in the number of services calls to LAPD from the Project Site. At this time, it is undetermined whether the Project would increase demand to the extent that a new facility would need to be constructed to maintain service ratios, the construction of which might result in adverse physical impacts. Therefore, further evaluation of this topic will be provided in the EIR.

### c) Schools?

**Less Than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD).

The Project Site is served by the following LAUSD public schools:<sup>104</sup>

- Olympic Primary Center (K), located at 950 S. Albany Street.
- 10th Street Elementary School (Grades 1-5), located at 1000 Grattan Street.
- John H. Liechty Middle School (Grades 6-8), located at 650 S. Union Avenue.
- Belmont High School Zone of Choice (Grades 9-12):<sup>105</sup>
  - Miguel Contreras Learning Complex, located at 322 Lucas Avenue, approximately 0.9 mile northwest of the Project Site.
  - Ramon C Cortines School of Visual and Performing Arts, located at 450 Grand Avenue, approximately 0.7 mile northeast of the Project Site.
  - Belmont High School, located at 1575 W. 2<sup>nd</sup> Street, approximately 1.7 miles northwest of the Project Site.
  - Edward R. Roybal Learning Center, located at 1200 W. Colton Street, approximately 1 mile northwest of the Project Site.

The Project includes the construction of a hotel with up to 730 guest rooms and related commercial/retail space. 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 other commercial/retail) uses as shown in **Table 4-3**.

**Table 4-3**  
**LAUSD Student Generation Rates**

Use	School Level		
	Elementary	Middle	High
Students Per Household	0.2269	0.0611	0.1296
Commercial and Retail Per 1,000 sf	0.610		
Lodging Per 1,000 sf	0.254		
Standard Office Per 1,000 sf	1.077		
Source: LAUSD, 2018 Developer Fee Justification Study, March 2018. These are the most recent student generation rates.			
The 2016 LAUSD Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12.			
For residential uses of the related projects, the following student generation rates were used: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12.			

<sup>104</sup> LAUSD School Finder: <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed April 8, 2019.

<sup>105</sup> Schools & programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries.

For commercial and retail uses, the student generation rate of 0.610 student per 1,000 square feet for “Neighborhood Shopping Center” is applied.

Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school).

An estimate of the number of students that could be indirectly generated by the Project’s proposed hotel and commercial retail uses is provided in **Table 4-4**. As stated in **Table 4-4**, the Project is estimated to generate 136 elementary school students, 37 middle school students, and 77 high school students for a total of 250 students.

**Table 4-4**  
**Estimated Student Generation**

Land Use	Project Amount	Student Generation			
		Elementary School	Middle School	High School	Total
Hotel Uses	624,254 sf	86	23	49	<b>158</b>
Office Uses (including ballroom)	68,761 sf	40	11	23	<b>74</b>
Commercial (including spa)	28,990 sf	10	3	5	<b>18</b>
<b>Total</b>		<b>136</b>	<b>37</b>	<b>77</b>	<b>250</b>
Rates: LAUSD, 2018 Developer Fee Justification Study, March 2018.					
Source: CAJA Environmental Services, December 2018.					

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. Because the Project contains no residential components, the Project’s projected student generation is likely to be less than estimated in **Table 4-4**, which is based on LAUSD generation factors. 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 are hired from the surrounding community or another city, there could be an increase in student population in the nearby schools of up to 250 students.

In addition, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project’s building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts.

Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. Accordingly, with adherence to existing regulations, impacts on schools would be less than significant, and no further analysis of this topic in the EIR is required.

**d) Parks?**

**Less Than Significant Impact.** Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks. Facilities in the area include:

- Toberman Recreation Center, 1725 Toberman Street
- Pico Union Vest Pocket Park, 1827 Hoover Street
- Alvarado Terrace Park, Malvern and Alvarado
- Hope and Peace Park, 843 Bonnie Brae
- Hoover Recreation Center, 1010 25th Street
- Grand Hope Park, 900 Hope Street

Since the Project does not include residential uses, it 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. Employees would not typically frequent parks or recreation centers during work hours but are more likely to use facilities near their homes during non-work hours.

A total of 83,052 square feet of open space will be provided as shown in **Table 4-5, Open Space**.

**Table 4-5  
Open Space Provided by the Project**

<b>Location</b>	<b>Size (sf)</b>
Ground Level Open Space	26,710
Level 4 Open Space	14,033
Level 5 Open Space	32,584
Level 6 Open Space	2,812
Level 34 Open Space	4,451
Level 38 Open Space	2,462
<b>Total</b>	<b>83,052</b>
sf = square feet HOK, Plans, November 2019, included as Appendix A-1 to this IS.	

It is also anticipated that the Project's visitors would generally utilize the on-site open space and common areas to meet their recreational needs. Therefore, there would be a less than significant impact associated with parks, and no further analysis of this topic in the EIR is required.

**e) Other public facilities?**

**Less Than Significant Impact.** Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.

The nearest library to the Project Site is the Pico Union Branch located at 1030 S. Alvarado Street (0.9 mile from the Project Site). Other nearby libraries include Central Library located at 630 South 5th Street. Since there is no residential component to the Project, the only potential new library visitors, if any, would be employees or visitors to the Project Site. The addition of 1,176 new employees to the Project Site would not materially change demand on local libraries.

The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the employees of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.<sup>106, 107, 108</sup>

Further, Measure L (City ballot measure passed in 2011) has provided funds to restore adequate services to the existing library system, restore service hours, and provided funds to purchase additional books and materials that were cut in the recession during 2010 and 2011.<sup>109</sup>

In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled with people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation could be attributable to those employees would generate minimal demand for library services. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios or other performance objectives for library services. Therefore, there would be a less than significant impact associated with library services, and no further analysis of this topic in the EIR is required.

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Checklist Question XVII.a, further analysis of the potential for the Project to result in a significant increase in the number of vehicle trips on local roadways will be evaluated in the Transportation Section of the EIR. Any necessary improvements to local roadways associated with development of the Project will also be identified in the Transportation Section of the EIR.

<sup>106</sup> "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": <https://www.arts.gov/sites/default/files/ToRead.pdf>

<sup>107</sup> "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: <http://old.diglib.org/use/whitepaper.htm>.

<sup>108</sup> "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies", Carol Tenopir: <http://www.clir.org/pubs/reports/pub120/contents.html>.

<sup>109</sup> LAPL, Measure L: <https://www.lapl.org/measure-l>, October 9, 2019.



## XVI. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- 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.** The Project does not have a residential component and would generate no direct increase in the number of residents within the service population. As discussed in Public Services Checklist Question XV.d, above, because the Project would introduce new visitors and employees to the Project Site, greater demand on existing public recreational and park facilities and services could be generated. As the Project would provide approximately 76,139 square feet of private and public open spaces across the Project Site through the provision of hardscape, planting area, swimming pool, outdoor amenity decks, fitness center, and other guest amenities. Project-related demand on existing public recreational and park facilities would be minimal. Employees would not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. It is also anticipated that the Project's visitors would generally utilize the on-site open space and common areas to meet their recreational needs. Therefore, the Project would not cause or accelerate the deterioration of regional or neighborhood parks and recreational facilities, and impacts on parks and recreational facilities would be less than significant. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The Project would provide both publicly accessible and private open space and recreational amenities. Social and community spaces for the hotel visitors would include a lobby/lounge with a restaurant on the ground floor; landscaped terrace, spa, and indoor and outdoor fitness areas on the 4th floor; an outdoor amenity deck with a swimming pool, lounge areas, and dining areas on the 5th floor; and green roofs on the 6th- and 34th floors, and a rooftop deck on the 38th floor. These Project features have been incorporated into the

overall Project design. The construction of these recreational facilities as part of the Project would take place at the same time as the rest of the construction processes and would have no additional adverse physical effects on the environment as discussed in Public Services Checklist Question XV.d. Therefore, there would be a less-than-significant impact in regard to construction or expansion of recreational facilities, and no further evaluation of this topic in an EIR is required.



## XVII. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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"/>
e. 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.** Construction of the Project would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. Construction has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

The Project proposes development of a hotel with up to 730 keys and related commercial/retail space that has the potential to result in an increase in daily and peak-hour traffic to the local and regional transportation systems. As such, the operation of the Project could adversely affect the existing capacity of the street system or exceed an established standard. In addition, construction of the Project could result in a temporary increase in traffic due to construction-related truck trips and worker vehicle trips. Therefore, traffic impacts during construction could also adversely affect the street system. The resulting increase in the use of the area's transportation facilities could affect the capacity of the roadway and transit system. The Project would also increase pedestrian activity in the area and demand for public transit. Therefore, the Project could conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and will be further analyzed in the EIR.

**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

**Potentially Significant Impact.** CEQA Guidelines Section 15064.3(b) relates to use of the vehicle miles traveled (VMT) as the methodology for evaluating traffic impact. The City adopted a VMT methodology on July 30, 2019. As previously discussed, the Project would construct

approximately 730 hotel guest rooms with associated conference function space, office (hotel administration) space, and restaurant and bar use. Total VMT associated with the Project would increase as a result of hotel guests and employers located on the Project Site. A VMT analysis will be included as additional information to address CEQA Guidelines Section 15064.3(b). Therefore, impacts may be potentially significant and 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.** Vehicular access to the Project Site would be provided through a driveway entrance on Albany Street, toward the southwest corner of the Project Site, a driveway entrance on Pico Boulevard, toward the northwest corner of the Project Site, and a driveway entrance on 14th Street, toward the southeast corner of the Project Site. The hotel would include a driveway leading to drop-off and valet area, along Pico Boulevard. In addition, the Project would include a drop off zone, located on Albany Street for secondary access to the hotel lobby.

No hazardous design features or incompatible land uses would be introduced with the Project that would create significant hazards to the surrounding roadways. The roadways adjacent to the Project Site are part of the existing urban roadway network and do not contain any sharp curves or dangerous design features. The Project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network.

The Project's access and driveways would conform to the City's design standards and applicable emergency access requirements as set forth by LADOT and LAFD and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. The project design would also be reviewed by the Department of City Planning, LADBS, and LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, impacts associated with hazardous geometric design features or incompatible uses would be less than significant and unlikely to occur, and no further evaluation of this topic in an EIR is required.

**d) Result in inadequate emergency access?**

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the construction traffic management plan that would be implemented to ensure adequate circulation and emergency access. In addition, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site

would remain unobstructed during construction of the Project, impacts related to emergency access would be less than significant.

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route.<sup>110</sup> The nearest disaster route is Figueroa Street, approximately 1,800 feet east of the Project Site.<sup>111</sup>

The Project would be designed to incorporate all City Building Code, Fire Code, and LADOT requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. Moreover, based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. The street system surrounding the Project Site is not considered substandard. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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<sup>110</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

<sup>111</sup> <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>

## XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input 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 and b).** Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. The Project would require excavation (approximately 43 feet below grade). As there would be some grading and earth movement, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe.

In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

## XIX. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

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

**Potentially Significant Impact.** Water and electricity are currently supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP). Wastewater collection and treatment services within the Project vicinity are provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LASAN). Natural gas is supplied by the Southern California Gas Company. Telecommunications facilities are typically controlled by private companies (e.g., Spectrum, AT&T, Verizon). The Project would increase the demand for water, electricity, natural gas, telecommunication facilities, and the generation of wastewater, and thus, increase the demand of treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required, which may have a significant impact on the environment. Therefore, further analysis of this topic will be provided in the EIR.

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, the Project would not require or result in the relocation or construction of new or expanded storm water facilities. No further evaluation of this topic in an EIR is required.

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

**Potentially Significant Impact.** LADWP supplies water to the Project Site. In accordance with Water Code Section 10912, a Water Supply Assessment (WSA) is required as the Project includes a hotel with more than 500 rooms. The WSA will determine the Project's water demand and whether supplies are available during normal, dry, and multiple dry years. Therefore, further analysis of this topic in the EIR will be provided.

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

**Potentially Significant Impact.** The Project would increase the generation of wastewater and, thus, increase the demand of wastewater treatment facilities compared to existing conditions such that physical expansion of the wastewater treatment facilities or construction of a new wastewater treatment facility may be required, which may have a significant impact on the environment. Therefore, further analysis of this topic in the EIR will be provided.

**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.** Various public agencies and private companies provide solid waste management services in the City of Los Angeles. Private collectors service most multi-family units and commercial developments, whereas LASAN collects the majority of residential waste from single-family and some smaller multi-family residences.

Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in unclassified landfills.<sup>112</sup> Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.<sup>113</sup> Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los

<sup>112</sup> Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

<sup>113</sup> The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

Angeles.<sup>114</sup> The Class III landfills have an estimated remaining capacity of 167.58 million tons, with 149.77 million tons open to the City. The unclassified landfill serving the County is Azusa Land Reclamation with an estimated 55.71 million tons of remaining capacity.<sup>115</sup> See **Table 4-6** for the disposal capacities.

**Table 4-6**  
**Solid Waste Disposal and Estimated Remaining Capacity for County of Los Angeles Landfills**

Name	Location	2017 Total Disposal (million tons) <sup>1</sup>	Estimated Remaining Capacity (million tons) <sup>2</sup>
<b>Class III</b>			
<b>Antelope Valley<sup>3</sup></b>	<b>Palmdale</b>	<b>0.496</b>	<b>12.36</b>
Burbank <sup>4</sup>	Burbank	0.032	2.71
Calabasas <sup>5</sup>	Unincorporated	0.352	5.60
<b>Chiquita Canyon<sup>6</sup></b>	<b>Unincorporated</b>	<b>1.491</b>	<b>59.10</b>
<b>Lancaster</b>	<b>Unincorporated</b>	<b>0.138</b>	<b>10.27</b>
Pebbly Beach <sup>7</sup>	Unincorporated	0.004	0.04
San Clemente Island <sup>8</sup>	Unincorporated	0.0004	0.035
Scholl Canyon <sup>9</sup>	Glendale/Unincorporated	0.391	4.70
<b>Sunshine Canyon City/County</b>	<b>Los Angeles/Unincorporated</b>	<b>2.018</b>	<b>68.04</b>
Whittier (Savage Canyon) <sup>10</sup>	Whittier	0.087	4.74
<b>Class III Total</b>		<b>5.011</b>	<b>167.60</b>
<b>Class III Total Open to City of Los Angeles</b>		<b>4.143</b>	<b>149.77</b>
<b>Unclassified</b>			
Azusa Land Reclamation	Azusa	0.423	55.71
Landfills open to the City of Los Angeles are in <b>bold</b> within the table.			
<sup>1</sup> Disposal quantities are based on actual tonnages reported by owners/operators of permitted solid waste disposal facilities to the Los Angeles County Department of Public Works' Solid Waste Information Management System.			
<sup>2</sup> As of May 2017.			
<sup>3</sup> The City of Palmdale approved the expansion and combined Antelope Valley Landfills #1 & #2 on September 19, 2011.			
<sup>4</sup> Limited to the City of Burbank use only.			
<sup>5</sup> Limited to Calabasas Wasteshed, as defined by Los Angeles County Ordinance No. 91-0003, which is composed of the incorporated cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks; that portion of the City of Los Angeles bordered by the northerly line of Township 2 North on the north, Interstate Highway 405 on the east, Sunset Boulevard and the Pacific Ocean on the south, and the City boundary on the west; and certain unincorporated areas in the Counties of Los Angeles and Ventura.			
<sup>6</sup> CUP expires November 24, 2019 or when the maximum capacity is reached, whichever is sooner.			
Proposed expansion pending. Conditional Use Permit (CUP) limits waste disposal to 30,000 tons per			

<sup>114</sup> The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.

<sup>115</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.



week.

<sup>7</sup> Land Use Permit (LUP) expires July 29, 2028.

<sup>8</sup> Landfill owned and operated by the U.S. Navy.

<sup>9</sup> Limited to Scholl Canyon Wasteshed as defined by City of Glendale Ordinance No. 4780, which is defined as County incorporated cities of Glendale, La Canada Flintridge, Pasadena, South Pasadena, San Marino, and Sierra Madre; County unincorporated communities known as Altadena, La Crescenta, Montrose; unincorporated area bordered by the cities of San Gabriel, Rosemead, Temple City, Arcadia, and Pasadena; and the unincorporated area immediately to the north of the City of San Marino bordered by the City of Pasadena on the west, north and east sides.

<sup>10</sup> Limited to use by the City of Whittier and waste haulers contracted with the City of Whittier.

Source: County of Los Angeles Countywide Integrated Waste Management Plan 2017 Annual Report prepared by the County of Los Angeles Department of Public Works in April 2019.

Within Los Angeles County, there are two solid waste transformation facilities that convert, combust, or otherwise process solid waste for the purpose of energy recovery; these are the Commerce Refuse to Energy Facility and the Southeast Resource Recovery Facility, located in the City of Long Beach. Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.<sup>116</sup> The remaining disposal capacity for the County's Class III landfills is estimated at approximately 167.60 million tons.<sup>117</sup>

Based on the 2017 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.60 million tons. The County, therefore, has disposal capacity beyond the Project's buildout year of 2023. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include wasteshed boundaries, geographic barriers, weather, and natural disasters. Therefore, the 2016 ColWMP Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The 2017 ColWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs, such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling. The City of Los Angeles is currently diverting 76 percent of its waste

<sup>116</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

<sup>117</sup> This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.

from landfills.<sup>118</sup> The City has adopted the goal of achieving 90 percent diversion by 2025 and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

## Construction

Pursuant to the requirements of Senate Bill 1374<sup>119</sup>, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

As shown in **Table 4-7**, after accounting for mandatory recycling, the Project would result in approximately 3,262 tons of construction waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

**Table 4-7**  
**Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
<b>Demolition Debris</b>			
Office	150,257 sf	155 pounds / sf	11,645
<b>Construction Waste</b>			
Residential	0 sf	4.38 pounds / sf	0
Non-Residential	722,005 sf	3.89 pounds / sf	1,404
<b>Total</b>			<b>13,049</b>
<b>Total after 75% recycling</b>			<b>3,262</b>
Note: sf = square feet; 1 ton = 2,000 pounds. Rate: U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types. Table: CAJA Environmental Services, December 2018.			

## Operation

<sup>118</sup> LA Sanitation, Recycling, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=alxbkb91s\\_4&\\_afLoop=18850686489149411#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!), accessed December 5, 2017.

<sup>119</sup> Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

As shown on **Table 4-8**, the Project would generate an increase of approximately 2,434 tons per year). The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.<sup>120</sup>

The increase in solid waste disposal would represent an approximate 0.07 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The increase in solid waste disposal would represent approximately 0.002 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

**Table 4-8**  
**Estimated Solid Waste Generation**

Land Use	Employees	Rates	Total (tons/year)
<b>Existing Uses (to be removed)</b>			
Office	0	Vacant	0
<b>Proposed Uses</b>			
Hotel	708	3.03 tons / employee	2,145
Hotel Conference	303	0.37 tons / employee	112
Spa	25	0.37 tons / employee	9
Office	26	0.37 tons / employee	10
Restaurant and Bars	53	2.98 tons / employee	158
<b>Net Total</b>			<b>2,434</b>

<sup>120</sup> The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd/s-lsh-wwd-s-zwlafr.jsessionid=nJABd\\_CcLHL4DCOKGSCJWv1buV9atYQtoUkP50TwYHe5jczy6Oak!782088041!NONE?\\_afLoop=17071741526736871&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D17071741526736871%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dge1mehnju\\_4](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd/s-lsh-wwd-s-zwlafr.jsessionid=nJABd_CcLHL4DCOKGSCJWv1buV9atYQtoUkP50TwYHe5jczy6Oak!782088041!NONE?_afLoop=17071741526736871&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D17071741526736871%26_afWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4)

**Table 4-8  
Estimated Solid Waste Generation**

Land Use	Employees	Rates	Total (tons/year)
Note: sf = square feet; 1 ton = 2,000 pounds. Rates (residential): City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2. Residential solid waste factor is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year). Rates (non-residential): City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study Table 4, July 2002. Non-residential solid waste factor is based on tons per employee per year: 0.91 for commercial/retail, 2.98 for restaurant, 0.92 for theater, 3.03 for hotel, 0.37 for office. Employees calculated using LAUSD 2018 Developer Fee Justification Study, March 2018. Table: CAJA Environmental Services, December 2018.			

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

**Less Than Significant Impact.** Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal.

AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

In March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste (food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. Beginning in January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would comply with and be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an onsite recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

As the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

**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?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

**No Impact (a through d).** The Project Site is located in an urbanized area with little natural vegetation. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone<sup>121</sup> a City-designated fire buffer zone.<sup>122</sup> Therefore, the Project Site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no further evaluation of this topic in an EIR is required.

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<sup>121</sup> ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

<sup>122</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	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.** As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. No sensitive plant or animal community or special status species occur on the Project Site. However, the Project does have the potential to degrade the quality of the environment or affect important examples of California’s history or prehistory. Potentially affected resources include the Pico-Union HPOZ. Therefore, further evaluation of this topic will be provided in the EIR.

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

**Potentially Significant Impact.** The EIR will address cumulative impacts for each environmental topic included in the scope of the EIR, including air quality, cultural resources,



energy, greenhouse gas emissions, land use and planning, noise, public services, transportation, tribal cultural resources, and utilities and service systems.

Regarding cumulative aesthetics impacts, related projects would be reviewed on a case-by-case basis by the City to comply with 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. Pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts would not be considered significant. Given the Project Site's location in a transit priority area, other residential, mixed-use, and employment center development projects located in the vicinity of the Project Site would similarly be anticipated to be located in transit priority areas and, therefore, qualify for an exemption pursuant to SB 743. Thus, cumulative impacts associated with aesthetics would be less than significant.

With regard to cumulative effects on agriculture/forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources and, therefore, could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts on these resources would be less than significant.

With regard to the cumulative effects of past, present, and future projects on geology and soils, the Project Site area is built out, and, therefore, it is unlikely that any projects would propose mining operations, or other similar uses that require boring or deep excavation into the earth that could exacerbate existing environmental conditions (i.e., trigger rupture of a known earthquake fault, strong seismic ground shaking, or trigger seismic-related ground failure or landslide) such that people or structures would be exposed to potential adverse effects. Typical excavation is for subterranean parking that rarely exceed several levels due to the cost implications. The Project and related projects would be required to implement site-specific geotechnical recommendations and mitigations measure, if applicable. Similarly, sewers are already available, and no alternative wastewater disposal system is proposed. In addition, the Project Site area is relatively flat and impervious, and, as such, there would be less-than-significant impacts from landslides, soil erosion/loss of topsoil, unstable geologic units, or expansive soils.

With regard to cumulative effects of hazards and hazardous materials, the presence of these materials are generally site-specific and need to be evaluated within the context of each individual related project. In addition, since the Project area is developed with mostly commercial and residential uses, none of the past, present, or future related projects would likely involve the routine use or transport of hazardous materials beyond those already that are commonly used (e.g., cleaning agents and paint thinners, etc. used for studio and set production uses). Furthermore, related projects would be required to comply with existing regulatory requirements regarding the storage, handling and disposal of hazardous materials. Finally, in terms of hazardous sites, EnviroStor shows that there are no identified federal

superfund or State response sites within the vicinity of the Project Site.<sup>123</sup> Therefore, past, present, and future related projects would not exacerbate existing environmental conditions, and cumulative impacts would be less than significant.

With regard to cumulative effects of hydrology and water quality, due to the highly urbanized nature of the Project area, there are no streams or rivers, FEMA flood hazard areas or other existing hydrological features that could be physically altered such that there would be substantial erosion, siltation or flooding. In terms of runoff, all related projects would be required at minimum to create stormwater mitigation plans and/or comply with the City's LID ordinance, thereby minimizing the potential for polluted runoff. Nevertheless, all related projects would comply with standard construction practices should dewatering be required. The related projects are in an urbanized area of the City that is completely built out. Therefore, it is unlikely that the related projects would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level. Any related project that meets the criteria for a Water Supply Assessment would have one prepared to identify adequate water supplies. Cumulative impacts on hydrology and water quality would be less than significant.

Since the Project does not include a housing component, the Project would not cumulative contribute to population and housing growth.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the ColWMP Annual Reports. Each annual report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2017 ColWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e. 2032), which is beyond the Project's buildout year. The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no further evaluation of these topics in an 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.** Based on the analysis contained in this Initial Study, the Project may have the potential to cause substantial adverse effects on human beings, either directly or indirectly, with regard to the following topics: air quality; cultural resources, energy, GHG emissions; land use and planning; noise, public services, transportation, tribal cultural resources, and utilities and service systems. As a result, these potential effects will be analyzed further in the EIR.

<sup>123</sup> <https://www.envirostor.dtsc.ca.gov/public/map/>, accessed April 8, 2019.