



1111 Sunset

Case Number: ENV-2018-177-EIR

Project Addresses: 1111 and 1115 West Sunset Boulevard, Los Angeles, CA 90012

Community Plan Area: Central City North

Council District: 1—Gilbert Cedillo

Project Description: The Project proposes to remove the existing vacant buildings on the former Metropolitan Water District headquarters campus within the Project Site that comprise approximately 114,600 square feet to develop up to 778 residential units (including up to 76 restricted affordable housing units), up to 98 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The proposed general commercial floor area could include up to 20,000 square feet of food and beverage uses associated with a hotel use. The Project would result in 994,982 square feet of floor area.

The proposed uses would be built on a seven-level parking podium, which would be partially below grade, at the lowest depth of 64 feet below grade, and partially above grade. The portions of the parking podium that would be above grade would be wrapped in active uses or landscaped. Above the parking podium, the proposed uses would be provided within four primary structures: two residential towers (Tower A and Tower B), a hotel (the Sunset Building), and a commercial building that could contain office, retail, restaurant, and parking uses (the Courtyard Building). A portion of the commercial floor area would also be provided in three low-rise commercial structures oriented towards Sunset Boulevard and Beaudry Avenue. In addition, low-rise residential buildings would be located throughout the eastern and southern portions of the Project Site at the base of the two residential towers.

The proposed uses would require 1,631 parking spaces in accordance with the Los Angeles Municipal Code (LAMC). An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure located within the footprint of the proposed Courtyard Building.

Pursuant to the LAMC, the Project would provide a variety of open space totaling 87,525 square feet, including approximately 81,475 square feet of exterior common area and 6,050 square feet of interior common area, of which at least 30,000 square feet would be publicly accessible during specified times.

PREPARED FOR:

City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental

APPLICANT:

1111 Sunset Boulevard, LLC.

May 2018

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Executive Summary

Date: May 21, 2018

Project Title: 1111 Sunset

Environmental Case Number: ENV-2018-177-EIR

Related Cases: CPC-2018-176-DB-BL-VCU-MCUP-SPR, VTT-80315

Project Location: 1111 and 1115 West Sunset Boulevard, Los Angeles, CA 90012

Community Plan Area: Central City North

Council District: 1—Gilbert Cedillo

Lead City Agency: City of Los Angeles Department of City Planning

Staff Contact Name and Address: Jason McCrea, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012

Phone Number: (213) 847-3672

Applicant Name and Address: 1111 Sunset Boulevard, LLC., 11766 Wilshire Boulevard, Suite 1150, Los Angeles, CA 90025

Phone Number: (310) 268-8288

General Plan Designation: General Commercial

Zoning: C2-2D

PROJECT DESCRIPTION:

The Project proposes up to 778 residential units (including up to 76 restricted affordable housing units), up to 98 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area (which could include up to 20,000 square feet of food and beverage uses associated with a hotel use). The Project would comprise 994,982 square feet of floor area. The proposed uses would be built on a seven-level parking podium, which would be partially below grade and partially above grade, creating a single building on the Project Site. Above the parking podium, the proposed uses would be provided within four primary structures, including two residential towers, a hotel, and a commercial building that could contain office, retail, restaurant, and parking uses. A portion of the commercial floor area would also be provided in three low-rise commercial structures oriented towards Sunset Boulevard and Beaudry Avenue. In addition, a portion of the proposed residential uses would be provided in low-rise residential buildings (not in the residential towers) scattered throughout the eastern and southern portions of the Project Site at the base of the two residential towers.

The proposed uses would require 1,631 parking spaces in accordance with the requirements of the Los Angeles Municipal Code (LAMC). Parking would be provided in the seven-level parking podium discussed above. An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure.

The Project would include a variety of open space totaling 87,525 square feet, including approximately 81,475 square feet of exterior common area and 6,050 square feet of interior common area, pursuant to the requirements of the LAMC. Implementation of the Project would require the removal of the existing vacant buildings within the Project Site that together comprise approximately 114,600 square feet. For a detailed description of the Project, refer to Attachment A, Project Description, of this Initial Study.

ENVIRONMENTAL SETTING:

The Project Site is comprised of a 262,437-square-foot lot located at 1111–1115 Sunset Boulevard and a 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard adjacent to the 1111–1115 Sunset Boulevard lot that would be merged with the 1111–1115 Sunset Boulevard lot. The Project Site is located within the Central City North Community Plan Area of the City of Los Angeles, north of Downtown Los Angeles and northwest of Chinatown. The Project Site is generally bounded by White Knoll Drive to the north, Alpine Street to the east, Beaudry Avenue to the south, and Sunset Boulevard to the west. The vicinity of the Project Site is developed primarily with commercial and residential uses. Specifically, north of the Elysian apartment building located within the Project Site, across White Knoll Drive, are additional multi-family residential uses and an auto repair shop at White Knoll Drive and Sunset Boulevard. Expanses of multi-family residential uses continue east of the Project Site, across Alpine Street. South of the Project Site, across Beaudry Avenue, are commercial uses and a parking structure. West of the Project Site, across Sunset Boulevard, are a motel, a nightclub, and multi-family residential uses. For additional detail, refer to Attachment A, Project Description, of this Initial Study.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

No.

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.): Potentially including, but not limited to, the Regional Water Quality Control Board, South Coast Air Quality Management District.

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

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.
-
-

Jason McCrea
PRINTED NAME



SIGNATURE

Planning Assistant
TITLE

(213) 847-3672
TELEPHONE NUMBER

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.

A. Project Description

INITIAL STUDY

Attachment A: Project Description

A. Project Summary

The 1111 Sunset Project (Project) is a new mixed-use development proposed on a 272,918-square-foot (6.27-acre) site comprised of a 262,437-square-foot lot located at 1111–1115 Sunset Boulevard and a 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard adjacent to the 1111–1115 Sunset Boulevard lot. The 1111–1115 Sunset Boulevard lot and the portions of Beaudry Avenue and Sunset Boulevard to be merged with the 1111–1115 Sunset Boulevard lot are collectively referred to herein as the Project Site. The Project Site is located in the Central City North Community Plan Area of the City of Los Angeles.

The Project proposes to remove the existing vacant buildings within the Project Site that comprise approximately 114,600 square feet to develop up to 778 residential units (including up to 76 restricted affordable housing units), up to 98 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The proposed general commercial floor area could include up to 20,000 square feet of food and beverage uses associated with a hotel use. The Project would result in 994,982 square feet of floor area. As discussed in further detail below, the Project would allow for an exchange of uses if certain uses are reduced or eliminated.

The proposed uses would be built on a seven-level parking podium, which would be partially below grade and partially above grade. The portions of the parking podium that would be above grade would be wrapped in active uses or landscaping. Above the parking podium, the proposed uses would be provided within four primary structures:¹ two residential towers (referred to herein as Tower A and Tower B), a hotel (referred to herein as the Sunset Building), and a commercial building that could contain office, retail, restaurant, and parking uses (referred to herein as the Courtyard Building). A portion of the commercial floor area would also be provided in three low-rise commercial structures oriented towards Sunset Boulevard and Beaudry Avenue. In addition, low-rise residential buildings would be located throughout the eastern and southern portions of the Project Site at the base of the two residential towers. The proposed uses would require 1,631 parking spaces in accordance with the Los Angeles Municipal Code (LAMC). An additional 168 parking spaces for the existing Elysian apartment building would also be provided within a five-level, partially subterranean parking structure (referred to herein as the Elysian Parking Facility) located within the footprint of the proposed Courtyard Building. The Project would provide a variety of open space totaling 87,525

¹ While the proposed structures would appear as separate buildings, the proposed structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking.

square feet, including approximately 81,475 square feet of exterior common area and 6,050 square feet of interior common area, pursuant to the LAMC.

B. Environmental Setting

1. Project Location

The Project Site encompasses the addresses at 1111–1115 Sunset Boulevard and portions of Beaudry Avenue and Sunset Boulevard adjacent to 1111–1115 Sunset Boulevard. The Project Site is located within the Central City North Community Plan area of the City of Los Angeles, north of Downtown Los Angeles and northwest of Chinatown. As shown in Figure A-1 on page A-3, the Project Site is generally bounded by White Knoll Drive to the north, Alpine Street to the east, Beaudry Avenue to the south, and Sunset Boulevard to the west.

2. Background and Existing Conditions

a. Project Site Background

As discussed above, the Project Site comprises a 262,437-square-foot lot at 1111–1115 Sunset Boulevard and a 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard adjacent to the 1111–1115 Sunset Boulevard lot.

The 262,437-square-foot portion of the Project Site is specifically comprised of the 1111 Sunset Boulevard parcel (Parcel B) and an airspace lot (Parcel A) at 1115 Sunset Boulevard. This portion of the Project Site is an oval-shaped site that is currently developed with five buildings (referred to herein as Buildings 1 through 5), as shown in Figure A-2 on page A-4. The 1111–1115 Sunset Boulevard lot was used as the headquarters for the Metropolitan Water District from 1963 to 1993. Buildings 1 through 4, which were completed between 1963 and 1973, were specifically constructed for the Metropolitan Water District. In 1994, the 1111–1115 Sunset Boulevard lot was transferred to Holy Hill Community Church. Holy Hill Community Church provided for the construction of Building 5 as the church's new sanctuary. Construction of Building 5 commenced in 1998. During operation of the 1111–1115 Sunset Boulevard lot by the Holy Hill Community Church, Building 4 located at 1115 Sunset Boulevard remained vacant. The Holy Hill Community Church subdivided the parcel (Parcel A, an airspace parcel) that contained the general envelope of Building 4. In 2011, the Holy Hill Community Church sold Parcel A. The Holy Hill Community Church declared bankruptcy in 2014 and vacated Parcel B (1111 Sunset Boulevard). The four existing buildings within Parcel B at 1111 Sunset Boulevard (Buildings 1, 2, 3, and 5) are currently vacant. Building 4 at 1115 Sunset Boulevard is currently occupied by the Elysian apartments.

b. Existing Project Site Conditions

As shown in Figure A-2 on page A-4, and as discussed above, a portion of the Project Site is currently developed with four vacant structures that are situated generally in the center and along the western area of the lot and the Elysian apartment building situated generally along the northern

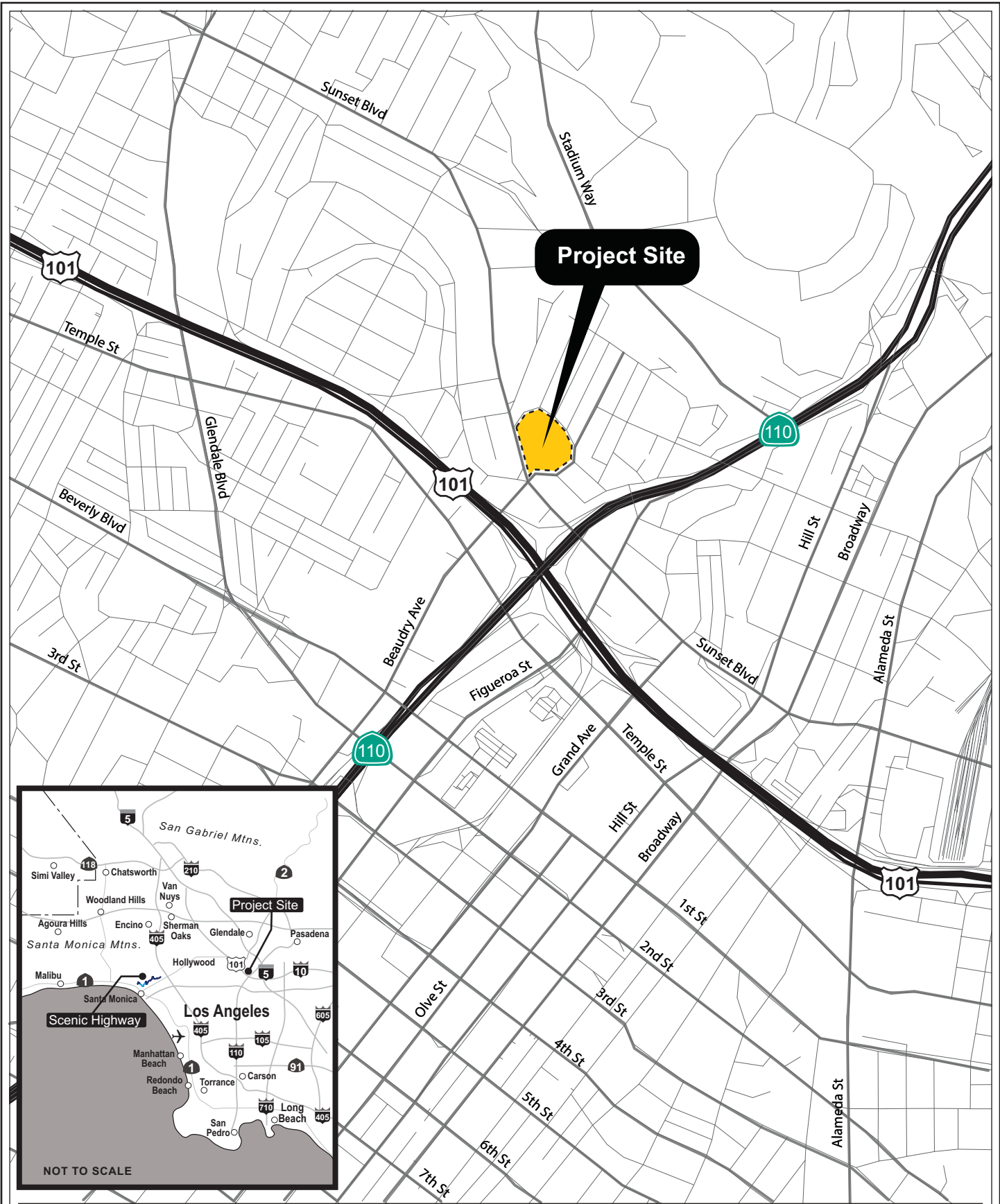


Figure A-1
Project Location Map

Source: Los Angeles County GIS, 2015; Eyestone Environmental, 2018.

EXISTING BUILDINGS

- 1. MWD COURTYARD BUILDING
- 2. MWD BRIDGE
- 3. MWD ADMIN BUILDING
- 4. ELYSIAN BUILDING
- 5. HOLY HILL CHURCH BUILDING

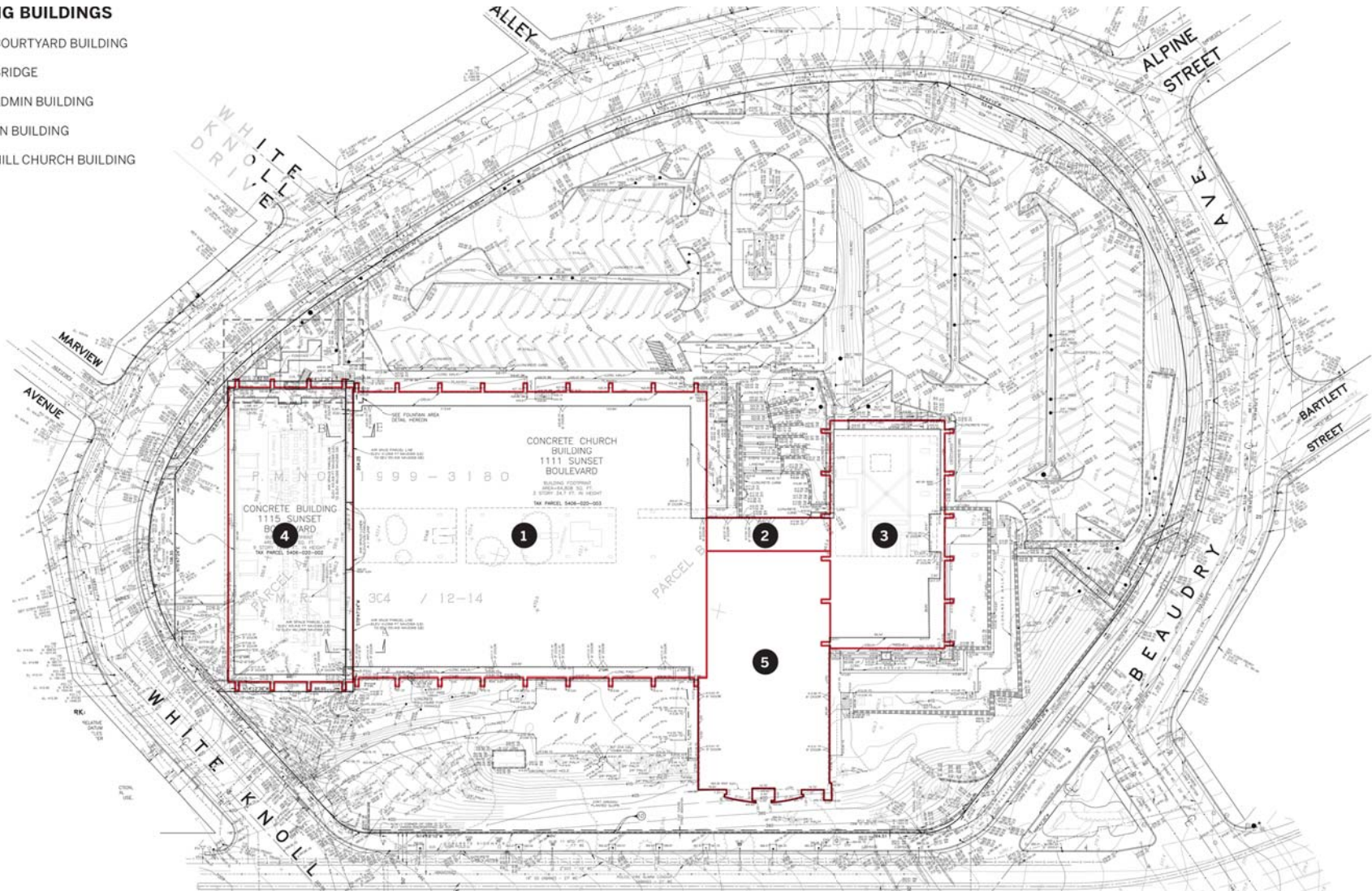


Figure A-2
Existing Site Buildings

portion of the lot.² The existing vacant structures comprise approximately 114,600 square feet and are three stories with an approximate height of 58 feet. The Project Site also includes surface parking and circulation areas generally located on the eastern half of the Project Site. Vehicular access to the Project Site is available at driveways along White Knoll Drive and Alpine Street. The Project Site slopes generally east to west with a grade difference of approximately 51 feet. Unmaintained landscaping, including trees, is dispersed throughout the Project Site.

The 10,481-square-foot portion of Beaudry Avenue and Sunset Boulevard of the Project Site includes part of the Beaudry Avenue frontage extending generally around the south and east portions of the 1111–1115 Sunset Boulevard lot as well as a portion of the street and the existing triangular road separator that divides Beaudry Avenue at Sunset Boulevard. The Beaudry Avenue frontage around the 1111–1115 Sunset Boulevard lot is currently improved with sidewalks and street trees. The traffic island that divides Beaudry Avenue at Sunset Boulevard is paved and landscaped with trees and shrubs that are unmaintained.

c. Land Use and Zoning

The Project Site is located within the planning boundary of the Central City North Community Plan³ area. The Project Site is designated as General Commercial and zoned C2-2D (Commercial zone, Height District 2 with Development Limitation). The zoning of the Project Site does not specify a building height limit, but rather limits the floor area ratio (FAR) to 3 to 1 (Footnote 4 in General Plan Land Use Map) and a permitted density of one unit per 400 square feet of lot area or one guest room per 200 square feet of lot area. The “D” limitation in particular limits the floor area within the Project Site to three times the buildable area of the lot. In addition, no front yard setbacks are required for commercial or residential uses. As illustrated in Figure A-3 on page A-6, the Project Site is also located within a Transit Priority Area as defined by the City.

3. Surrounding Land Uses

The vicinity of the Project Site is developed primarily with commercial and residential uses. Specifically, north of the Elysian apartment building located within the Project Site, across White Knoll Drive, are additional multi-family residential uses and an auto repair shop at White Knoll Drive and Sunset Boulevard. Expanses of multi-family residential uses continue east of the Project Site, across Alpine Street. South of the Project Site, across Beaudry Avenue, are structured parking and commercial uses. West of the Project Site, across Sunset Boulevard, are a motel, a nightclub, and multi-family residential uses. An aerial view of the Project Site and vicinity is provided in Figure A-4 on page A-7.

² There is a Reciprocal Easement Agreement between the owner of the Elysian apartments and the Applicant which defines and controls the relationship between the entities.

³ The City is currently in the process of updating the Central City North Community Plan.

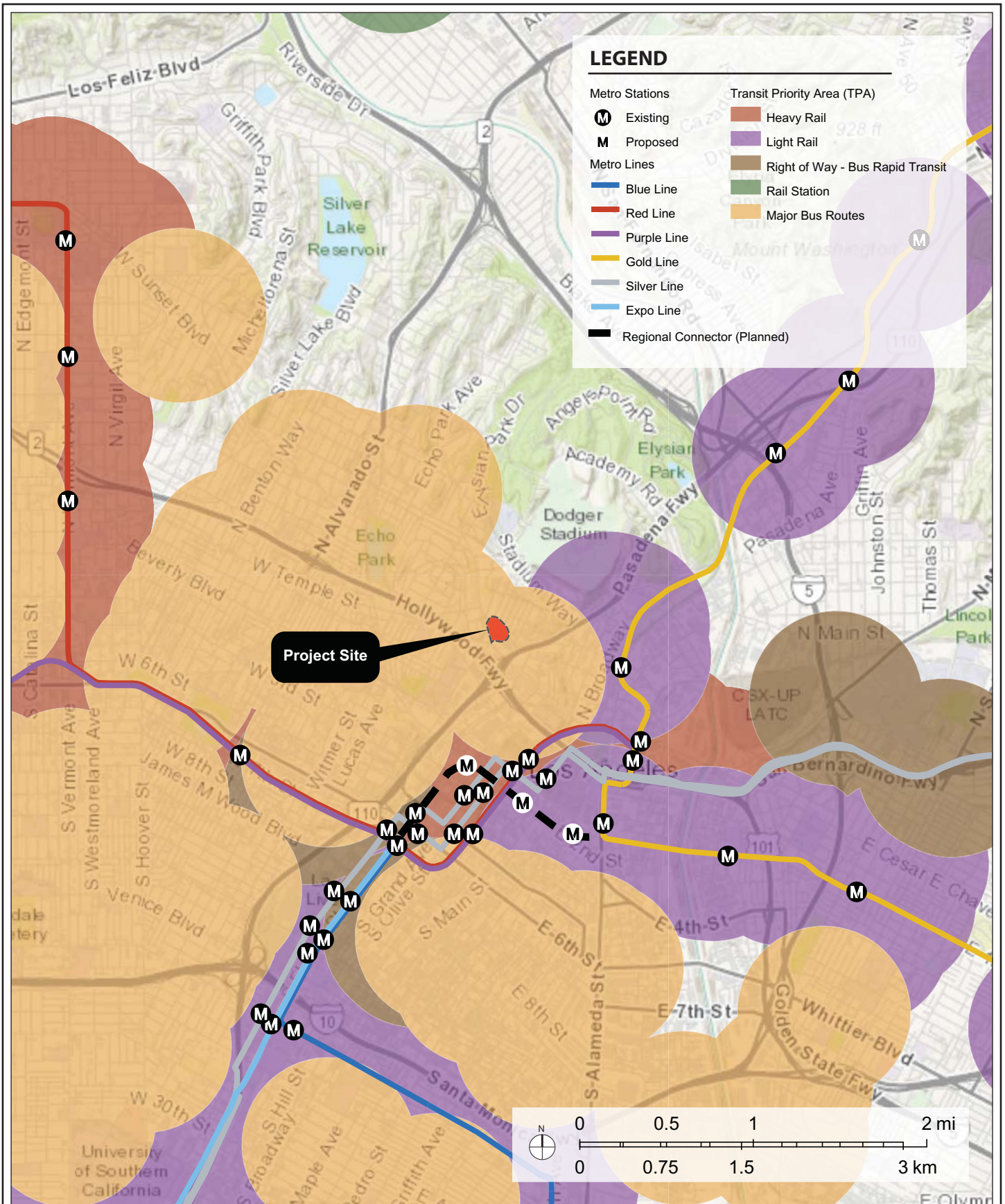


Figure A-3
Location of Project Site within a Transit Priority Area

Source: Los Angeles Department of City Planning, 2018; Eyestone Environmental, 2018.

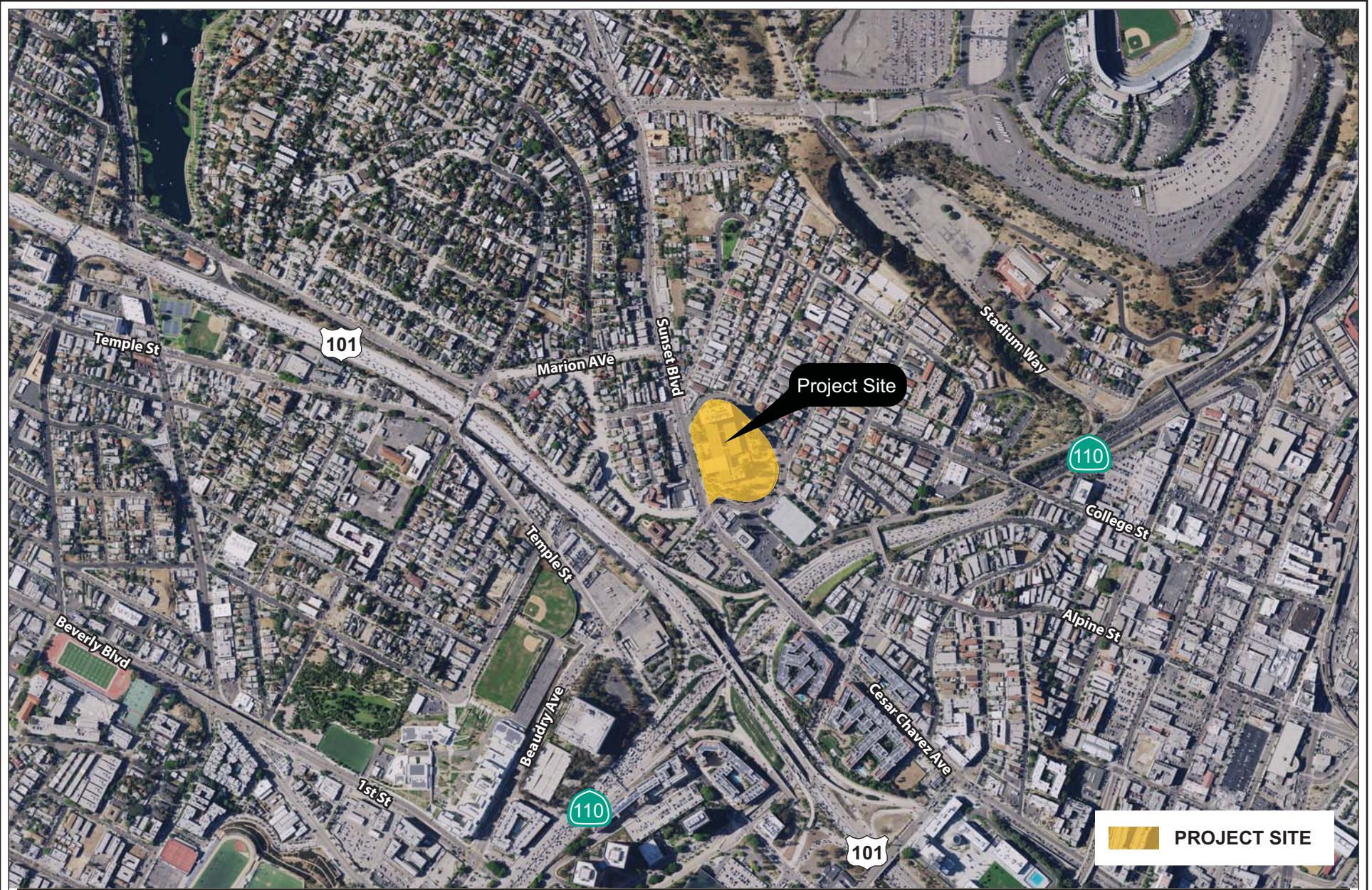


Figure A-4
Aerial Photograph of the Project Site and Vicinity

4. Freeways and Transit

As shown in Figure A-1 on page A-3, primary regional access is provided by State Route 110 (SR-110) and the Hollywood Freeway (US-101), which are accessible within less than one mile of the Project Site. Major arterials providing regional access to the Project Site include Sunset Boulevard and Figueroa Street.

Public transit service in the vicinity of the Project Site is currently provided by numerous local and regional bus lines, several of which provide connections to Downtown subway stations. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) provides a bus stop located at Sunset Boulevard and Beaudry Avenue. This stop includes the Metro Bus Line 2/302 that runs east/west along Sunset Boulevard. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at Sunset Boulevard and Figueroa Street. This line connects Downtown Los Angeles with the City of Santa Monica. Adjacent to the Project Site, Metro Bus Line 4 runs east/west along Sunset Boulevard and primarily east/west along Santa Monica Boulevard. This bus line connects Downtown Los Angeles with West Los Angeles. The Project Site is also located one block from a stop of Metro Bus Line 10 that runs east/west along Temple Street. In addition, the Project Site is near the LADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Hold Line Station which has connections to Union Station and Downtown Los Angeles.

C. Description of the Project

1. Project Overview

As summarized in Table A-1 on page A-9, the Project proposes to remove the existing vacant structures on the former Metropolitan Water District headquarters campus within the Project Site that comprise approximately 114,600 square feet and develop up to 778 residential units (including up to 76 restricted affordable housing units), up to 98 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area (which could include up to 20,000 square feet of food and beverage uses associated with a hotel use). The Project would result in 994,982 square feet of floor area. The proposed uses would require 1,631 parking spaces in accordance with the LAMC. An additional 168 parking spaces for the existing Elysian apartment building would be provided within a five-level, partially subterranean parking structure (Elysian Parking Facility) located within the footprint of the proposed Courtyard Building. The Project would include a variety of open space totaling 87,525 square feet (excluding the Elysian Parking Facility roof deck), including approximately 81,475 square feet of exterior common area and 6,050 square feet of interior common area, pursuant to the LAMC.

The architectural design features a contemporary architectural style with horizontal and vertical articulation. The materials consist of painted metal, glass, aluminum screening, concrete, plaster, and painted portions of the same materials. The two tallest towers feature a slimmer architectural language of grids, while the shortest tower emphasizes horizontal planes with cantilevered eaves at each level. The Courtyard Building references the architecture of the Metropolitan Water District Headquarters building (the Elysian apartment building).

**Table A-1
Summary of Floor Area within the Project Site^a**

Land Use	Existing Development	Proposed Development	Floor Area Upon Completion
Residential	110,336 sf (96 units)	776,982 sf (778 units)	887,318 sf (874 units) ^b
Hotel		75,000 sf (98 rm)	75,000 sf (98 rm)
Office		48,000 sf	48,000 sf
Commercial (retail/restaurant)		95,000 sf	95,000 sf
Existing Vacant Buildings	114,600 sf	0 sf	0 sf
Total	224,936 sf	994,982 sf	1,105,318
<hr/> <i>du = dwelling units</i> <i>rm = rooms</i> <i>sf = square feet</i> ^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> ^b <i>Includes existing Elysian apartment building to remain.</i> <i>Source: Eyestone Environmental, 2017.</i>			

The Project would allow for an exchange of uses if certain uses are reduced or eliminated. In particular, the number of residential units could be up to 827 units if the proposed hotel is not constructed, the number of hotel rooms could be up to 120 rooms with a reduction in the number of residential units to 767 units, and/or the entirety of the proposed office space could be allocated to the residential floor area to provide larger units with no increase in the maximum number of 827 units. Additionally, the Project could include an all-residential development with no hotel, office, or commercial uses. Up to 262 dwelling units could also be permitted as short-term rentals under the City’s conditional use permit process. This Initial Study and the Draft EIR to be prepared will evaluate the most conservative scenario to determine the Project’s potential impacts, and would consider the maximum impacts of the proposed development scenarios.

2. Design and Architecture

The proposed uses would be built on a seven-level parking podium, which would be partially below grade and partially above grade. The portions of the parking podium that would be above grade would be wrapped in active uses or landscaping. Above the parking podium, the proposed

uses would be provided within four primary structures,⁴ including two residential structures (Tower A and Tower B), a hotel (the Sunset Building), and a commercial building that could contain office, retail, restaurant, and parking uses (the Courtyard Building). The remaining commercial floor area would be provided in three low-rise commercial structures oriented towards Sunset Boulevard and Beaudry Avenue. In addition, low-rise residential buildings would be located throughout the eastern and southern portions of the Project Site around the base of the two residential towers.

As shown in the conceptual site plan provided in Figure A-5 on page A-11, the proposed residential uses would be concentrated along the eastern and southern boundaries of the Project Site, adjacent to other multi-family residential uses. Specifically, Tower A would be situated along the southern portion of the Project Site while Tower B would be located along the eastern portion of the Project Site. Tower A would include approximately 431 residential units and would comprise approximately 421,000 square feet of floor area, including amenities. Tower A would be up to 49 levels with an approximate height of 572 feet. Tower B would include approximately 262 residential units and would comprise approximately 272,000 square feet of floor area, including amenities. Tower B would be up to 31 levels and approximately 408 feet in height. Tower A and Tower B would be slender in profile and are located on the Project Site to maintain axial views to the Downtown skyline from Beaudry Avenue and White Knoll Drive. As illustrated in Figure A-5, 26 low-rise residential buildings would be dispersed around the base of the two residential towers. The low-rise residential buildings could include two to eight units within each building and range from two to four stories up to 91 feet in height. The low-rise residences would include features such as small yards, front doors facing public spaces, and windows with views to the surrounding streets.

The Sunset Building would be located at the southwestern corner of the Project Site, primarily fronting Sunset Boulevard. The Sunset Building would comprise approximately 95,000 square feet and would include 98 hotel guest rooms, approximately 20,000 square feet of food and beverage uses, 5,800 square feet of lobby/service areas, and 4,200 square feet of meeting space. The Sunset Building would be up to 17 levels and would reach an approximate height of 211 feet. The Sunset Building would be located on the prominent corner of Sunset Boulevard and Beaudry Avenue. This position is both highly visible and well connected to the Sunset Boulevard corridor by public transit and private vehicles at the signaled intersection. The Sunset Building is therefore designed to provide a landmark on Sunset Boulevard and a gateway onto the Project Site, with a dedicated drop-off and pick-up area, water features reminiscent of the former MWD campus and a public stair and elevator with access to landscaped spaces at the center of the Project Site. Adjacent to the Sunset Building would be three low-rise commercial structures that would be oriented towards Sunset Boulevard and Beaudry Avenue. The low-rise commercial structures would be one to three levels up to 64 feet in height. Behind the low-rise commercial structures fronting Sunset Boulevard would be the Courtyard Building. The Courtyard Building would comprise approximately 57,500 square feet and would include approximately 48,000 square feet of office space and 9,500 square feet of commercial space. The Courtyard Building would be three levels with an approximate height of 91 feet. The Courtyard Building would reconstruct many features reminiscent of the Metropolitan Water District buildings, including outboard columns, sun screens, and extended slabs with occupiable outdoor spaces.

⁴ While the proposed structures would appear as separate buildings, the proposed structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking.

The Elysian Parking Facility would be incorporated in the design of the Courtyard Building and include an approximately 12-foot setback from the Elysian apartment building. Residents, staff, and visitors of the Elysian apartment building would directly access the Elysian Parking Facility through up to five pedestrian bridges and through the 12-foot setback. The Elysian Parking Facility would also include a rooftop amenity deck for use by residents of the Elysian apartment building.

The proposed buildings would be integrated via parking, plazas, terraces, landscaping and pedestrian pathways. The Project would be designed in a contemporary architectural style and would feature design elements that would integrate the Project with the surrounding uses. The proposed building materials would consist of various types of glass panels, metal balustrades and screening elements, and plaster. The tower façades would draw upon the character of Los Angeles' mid-century modern architecture to create richly layered, tectonic constructions that are activated by light and accessible to residents in the form of balconies and large operable windows. This layering would also enhance building performance by providing solar shading and increased opportunities for daylight and fresh air.

3. Open Space and Landscaping

The Project would incorporate numerous common and private open space and recreational amenities within the Project Site. As shown in Figure A-6 on page A-13, the Project would provide common open space that would be generally publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The common open space proposed to be provided within the Project Site would total 87,525 square feet, including approximately 81,475 square feet of exterior common area and 6,050 square feet of interior common area, in accordance with the requirements of the LAMC. As illustrated in Figure A-6, the primary open space amenity would be a 30,000-square-foot courtyard (referred to as The Hill) that would be located at the center of the Project Site. The Hill would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown skyline. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, a spa and open spaces would be included as part of the hotel. Additional common and private open space areas are provided throughout the Project Site.

4. Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via five driveways surrounding the Project Site, including along White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. In particular, a dedicated drop-off and pick-up area at the corner of Beaudry Avenue and Sunset Boulevard is proposed as part of the Project, which would provide access, including valet parking, to the hotel use and commercial uses. Access for trash pickup and other freight vehicles would be provided via driveways on Alpine Street, Beaudry Avenue, and Sunset Boulevard.

Pedestrian access would be enhanced along the perimeter of the Project Site and would be provided via new pedestrian walkways from White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard.

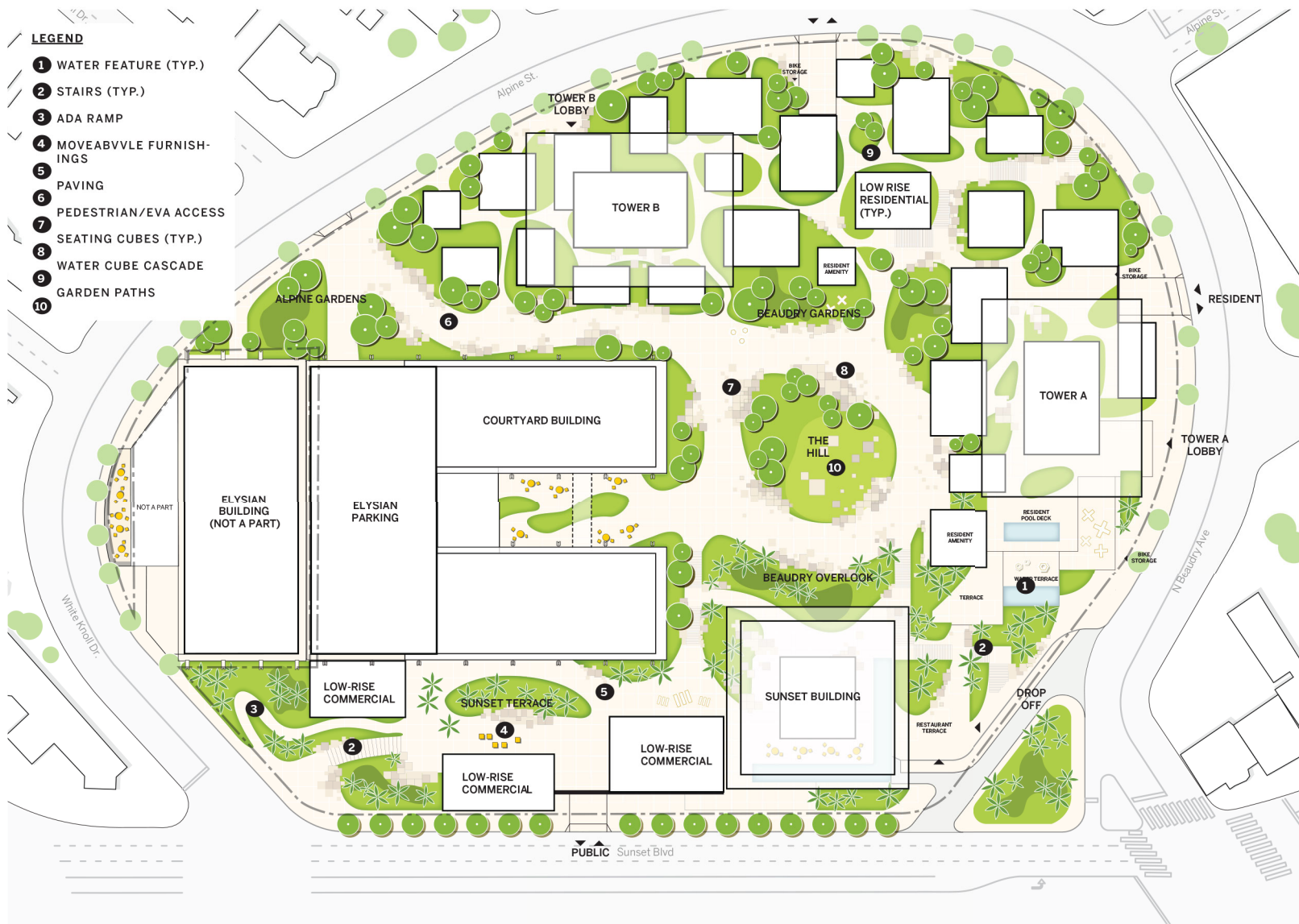


Figure A-6
Conceptual Landscape Plan

Source: James Corner Field Operations, 2018.

The commercial uses along Sunset Boulevard would also be accessible from entrances along Sunset Boulevard and Beaudry Avenue.

The proposed uses would require and would provide 1,631 parking spaces in accordance with the requirements of the LAMC. These parking spaces would be located within a seven-level parking podium, which would be partially below grade and partially above grade. The portions of the parking podium that would be above grade would be wrapped in active uses or landscaping. Below grade parking would extend to a maximum depth of 64 feet. An additional 168 parking spaces for the existing Elysian apartment building would also be provided within the Elysian Parking Facility located within the footprint of the proposed Courtyard Building, as previously described above.

In accordance with LAMC requirements, the Project would provide 995 bicycle parking spaces, including 136 short-term spaces and 841 long-term spaces. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

5. Lighting and Signage

Proposed lighting would include shielded low to medium output exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, shielded low to medium output lighting to accent signage, architectural features, exterior artwork or murals, and landscaping elements would be incorporated throughout the Project Site. All exterior lights, including lights on the rooftop, would be directed onto the Project Site and designed to minimize light trespass from the Project Site. New sources of artificial lighting that would be introduced by the Project would also include interior lighting and automobile headlights. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. All Project lighting would comply with applicable LAMC lighting standards.

Project signage would include a central identify sign and various general wayfinding and retail signs typically associated with a mixed-use project similar to the Project. The identity sign would be located on Sunset Boulevard and would consist of a building-mounted sign with cutout lettering presenting the Project name and/or address. The Project would have four rooftop identity signs located on the Sunset and Courtyard buildings. Typical of an urban mixed-use center, the Project would include retail signage primarily orienting towards Sunset Boulevard, including monument signs at Sunset Boulevard and Beaudry Avenue and Sunset Boulevard and White Knoll Drive. Due to the continuous changing nature of retail, retail signage could change over time. Other vertical building-mounted signage would be located along Sunset Boulevard, Beaudry Avenue, Alpine Street, and White Knoll Drive to indicate the main residential guest and commercial parking entrances. Awning signs and projecting signs would be used to identify the residential lobby entrances and retail locations at a pedestrian scale. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and residential corridors. Project signage may also include murals on building walls. All Project signs would be designed to complement the architectural design of the proposed buildings. In general, new signage would be architecturally integrated into the design of the buildings and would establish appropriate identification for the proposed uses. Project signage would be illuminated by means of shielded low to medium output external lighting, internal halo lighting, or ambient light.

6. FAR, Density, and Setbacks

As discussed above, the Project Site is designated as General Commercial and zoned C2-2D (Commercial zone, Height District 2 with Development Limitation). The zoning of the Project Site does not specify a building height limit, but rather limits the FAR to 3 to 1. Based on the lot area of the Project Site, equal to 272,918 square feet, the Project Site's by-right floor area is approximately 818,754 square feet. By setting aside 11 percent of the Project Site's base density as Restricted Affordable units at a Very Low-Income level, the Project is entitled to a 35 percent floor area increase permitting approximately 1,105,318 square feet of floor area potential which generates a FAR of 4.05:1. The existing Elysian apartment building's floor area, equal to 110,336 square feet,⁵ must be deducted from the Project Site's development potential. Once deducted, the Project's total permitted and proposed floor area will be approximately 994,982 square feet (generating a 3.65:1 floor area ratio).

The permitted density within the Project Site is one dwelling unit per 400 square feet or one guest room per 200 square feet of lot area. Based on the lot area of the Project Site, 683 dwelling units or 1,364 guest rooms are permitted within the Project Site. Dwelling units and guest rooms can be constructed together, but the development ratio for each use affects the other. By setting aside 11 percent of the Project Site's base density as Restricted Affordable units at a Very Low-Income level, the Project can request and is requesting a 35 percent density increase which permits a maximum of 923 dwelling units on the Project Site. Once the existing Elysian apartment building's 96 joint living and work quarter units⁶ are deducted from the Project Site's development potential, a total of 827 dwelling units are permitted. As discussed above, the Project proposes 778 dwelling units and 98 guest rooms (98 guest rooms use the same lot area as 47 dwelling units). The Project would allow for an exchange of uses if certain uses are reduced or eliminated. In particular, the number of residential units could be up to 827 units if the proposed hotel is not constructed, the number of hotel rooms could be up to 120 rooms with a reduction in the number of residential units to 767 units, and/or the entirety of the proposed office space could be allocated to the residential floor area to provide larger units with no increase in the maximum number of 827 units. Additionally, the Project could include an all-residential development with no hotel, office, or commercial uses. Up to 262 dwelling units could also be permitted as short-term rentals under the City's conditional use permit process.

Based on the LAMC and Yard Determination issued on November 2, 2017 by the Los Angeles Department of Building and Safety, the Project Site only includes front yards. The C2 zone established that no yards are required in front yards. The Project would provide landscaped buffers where residential uses abut public streets. Generally, the Project's commercial component would be built to the sidewalk.

⁵ The Elysian's apartment building joint-live work units occupy 109,236 square feet based on a Building Permit, No. 08016-10003-11438, issued December 3, 2014. The Elysian's apartment building ground floor commercial restaurant occupies 1,110 square feet per a Ready to Issue stamped plan, dated May 19, 2016, associated with the Winsome CUB case ZA 2015-0825 and not including the patio seating area.

⁶ Based on a Building Permit, No. 08016-10003-11438, issued December 3, 2014.

7. Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design.

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

8. Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to be completed in 2028. It is estimated that approximately 472,000 cubic yards of export material would be hauled from the Project Site during the demolition and excavation phase. The existing parking structure located south of the Project Site, across Beaudry Avenue, could be used during construction of the Project for staging and construction worker parking.

D. Requested Permits and Approvals

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

- Pursuant to LAMC Section 12.22-A,25 a 14-percent Density Bonus to provide an additional 95 units in lieu of 683 base units, for a total of 778 units. The Project would set aside 76 units (11 percent) for Very Low Income Households, would utilize parking option 1, and one On-Menu and one Off-Menu incentive:

- Pursuant to LAMC Section 12.22-A,25(F), an On-Menu Incentive to permit a 35-percent increase in FAR to permit a 4.05 FAR in lieu of 3.0 FAR permitted by the parcel D limitation, zoned C2-2D.
- Pursuant to LAMC Section 12.22-A,25(G), a Waiver of Development Standard (Off-Menu) to permit a reduction in the building separation requirements as defined by LAMC Section 12.21- C,2(a).
- Pursuant to LAMC Section 12.32-R,2(e), a request for the removal of a variable width building line, created via ordinance 101,106, effective February 1953.
- Pursuant to LAMC Section 12.24-T and LAMC Section 12.24-W,24(a), Vesting Conditional Use Permit to permit a hotel use and short term/extended stay rentals within 500 feet of an R zone.
 - Pursuant to LAMC Section 12.24-W,1 Master Conditional Use Permit to allow the on-site and off-site sale of a full line of alcoholic beverages in conjunction with the proposed development of a mixed-use project, which would include 75,000 square feet of commercial space and a hotel. Alcohol sales are being requested within the following areas:
 - Commercial: a total of 13 (thirteen) tenant spaces would offer a full line of alcohol for on- and off-site sales;
 - Hotel: a total of seven locations within the hotel would offer full line sales, with a restaurant with outdoor dining for on- and off-site sales.
- Pursuant to LAMC Section 16.05, Site Plan Review for a development project which creates 50 or more dwelling units or guest rooms and over 50,000 square feet of commercial floor area.
- Pursuant to California Government Code Sections 66473.1 and 66474 (Subdivision Map Act) and LAMC Sections 17.00 and 17.15 of Article 7 (Division of Land), approval of a phased Vesting Tentative Airspace Tract Map (Tract No. 80315) which includes a master lot and 17 airspace lots. The Tract request includes the following:
 - A request to vacate and merge portions of Beaudry Avenue into the property;
 - An approximately 5-foot wide sidewalk easement, extending six inches below grade along Alpine Street and portions of White Knoll Drive and Beaudry Avenue. Building structures are permitted below six inches;
 - A reduction from Advisory Agency’s Parking Policy to allow parking to be calculated based on LAMC Section 12.22 A.25 (d)(1);
 - A Haul Route approval.

B. Environmental Checklist

INITIAL STUDY

Attachment B: Environmental Checklist

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

Senate Bill 743 [Public Resources Code 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.” Public Resources Code 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.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. Public Resources Code 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.

The related City of Los Angeles Department of City Planning Zoning Information File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s *L.A. CEQA Thresholds Guide* shall not be considered an impact for infill projects within TPAs pursuant to CEQA”¹ and confirming the application of Senate Bill 743 and Public Resources Code Section 21099 as applicable and as allowed for under the City’s *L.A. CEQA Thresholds Guide*.

As described in Attachment A, Project Description, of this Initial Study, the Project is a new mixed-use development that would include up to 778 residential units, up to 98 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. As such, pursuant to Senate Bill 743, the Project is considered a mixed-use residential project. Pursuant to Public Resources Code Section 21099, the Project is also considered an employment center project because it is located on property that is zoned for commercial uses and would include development of a proposed hotel and other commercial uses with a floor area ratio (FAR) no less than 0.75 and that is located within a transit priority area. Specifically, the Project Site is zoned C2-2D (Commercial zone, Height District 2), allowing commercial uses and a FAR of 3:1. In addition, the Project Site is located on an infill site as defined by Public Resources Code Section 21099. Specifically, the Project Site is a lot located within an urban area that has been previously developed. Also pursuant to Public Resources Code Section 21099, the Project Site is within a transit priority area as it is located less than 0.5-mile from several bus lines along Sunset Boulevard, including bus transit service operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). In particular, Metro provides a bus stop located at Sunset Boulevard and Beaudry Avenue, adjacent to the Project Site. This stop includes the Metro Bus Line 2/302 that runs east/west along Sunset Boulevard. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at Sunset Boulevard and Figueroa Street. This line connects Downtown Los Angeles with the City of Santa Monica. Also adjacent to the Project Site, Metro Bus Line 4 runs east/west along Sunset Boulevard and primarily east/west along Santa Monica Boulevard. This bus line connects Downtown Los Angeles with West Los Angeles. The Project Site is also located one block from a Metro Bus Line 10 stop that runs east/west along Temple Street. In addition, the Project Site is near the LADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Gold Line Station which has connections to Union Station and Downtown Los Angeles. Therefore, the Project Site is located in a transit priority area as defined in Public Resources Code Section 21099. The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a transit priority area, as defined in the City’s Zoning Information File ZI No. 2452.² Thus, any aesthetic impacts that might be identified for the Project would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. The following aesthetics discussion is provided for information purposes only. The discussion considers factors from the City’s *L.A. CEQA Thresholds Guide*.

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

² City of Los Angeles, Zone Information and Map Access System (ZIMAS), <http://zimas.lacity.org/>, accessed March 5, 2018.

Would the project:

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

No Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the *L.A. CEQA Thresholds Guide*, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the *L.A. CEQA Thresholds Guide*, panoramic views are typically associated with vantage points looking out over a section or urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies. For the purposes of this discussion, the focus is on the availability of the panoramic views of the downtown area, i.e., scenic vista of the panorama of the downtown area.

As shown in the site photographs included in Figure B-1 on page B-4 and in Figure B-2 on page B-5, due to the highly urbanized and built out surroundings, publicly available scenic vistas of the downtown area as a whole from public streets and sidewalks adjacent to the Project Site are limited. Specifically, as illustrated in Figure B-1 and in Figure B-2, publicly available scenic vistas in the immediate Project Site vicinity are blocked by trees, intervening development, and changes in slope from the elevated portions of Beaudry Avenue (e.g., generally where Beaudry Avenue and Alpine Street intersect), southeast-south of the Project Site, and along portions of Sunset Boulevard, west of the Project Site. Publicly available scenic vistas that include the Downtown skyline are also available further east of the Project Site along White Knoll Drive and Beaudry Avenue towards Figueroa Terrace. The streets east of the Project Site are at higher elevations, but because of the downslope of the topography towards downtown and intervening development, a panoramic view of the downtown area is, as a whole, not fully available. Publicly available scenic vistas are not available north and east of the Project Site given the existing intervening development (e.g., Elysian apartments and vacant buildings within the Project Site). In addition, there are no panoramic views of other valued visual resources such as a mountain range or the ocean.

As shown in the conceptual site plan included in Figure A-4 in Attachment A, Project Description, of this Initial Study, the proposed development would be contained within the boundaries of the Project Site and would not extend across Beaudry Avenue at Alpine Street such that existing publicly accessible scenic vistas of the Downtown skyline would be obstructed. Similarly, the Project does not propose any development across Sunset Boulevard such that a proposed structure could obstruct existing publicly accessible scenic vistas of the Downtown skyline. Therefore, existing publicly accessible scenic vistas of the Downtown skyline from Sunset Boulevard would remain. Furthermore, while the proposed residential towers would be visible from publicly available scenic vistas of the Downtown skyline that are available further east of the Project Site along White Knoll Drive and Beaudry Avenue towards Figueroa Terrace, the proposed towers would be consistent with the high-rise buildings that encompass the Downtown skyline. In addition, publicly available scenic vistas of the Downtown skyline available further east of the Project Site would be largely preserved.

Overall, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.



View of Sunset Boulevard facing northwesterly, taken from the eastern side of Sunset Blvd. on a traffic island at its intersection with Beaudry Avenue.



View of the eastern sidewalk of Sunset Boulevard adjacent to the property site, viewed southwardly from its intersection with White Knoll Dr.



Westerly view adjacent to the Project site along the southern side of White Knoll Drive, taken near its intersection with Marview Avenue.



Northerly view of the intersection between Alpine St. and White Knoll Dr., adjacent to the property site.

Figure B-1
Photographs of Surrounding Project Site Vicinity



Southerly view looking down the western side of Beaudry Avenue, adjacent to the Project site.



Southerly view of the intersection between Alpine St. and N Beaudry Ave., adjacent to the property site.



Southwesterly view from the intersection of N Beaudry Ave. and Sunset Blvd., adjacent to the property site.



Northwesterly view of Sunset Blvd. viewed from its intersection with N Beaudry Ave., adjacent to the property site.

Figure B-2
Photographs of Surrounding Project Site Vicinity

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?

No Impact. The Project Site is not located along a State scenic highway. The nearest officially eligible State scenic highway is along the Foothill Freeway (I-210), approximately 12 miles northeast of the Project Site.³ Therefore, the Project would not substantially damage scenic resources within a State or City-designated scenic highway. Moreover, pursuant to Senate Bill 743 and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

The Project's potential impacts to historical resources are discussed below in Checklist Question V, Cultural Resources.

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

No Impact. As discussed in the *L.A. CEQA Thresholds Guide*, adverse visual effects can include the loss of natural features or areas, the removal of urban features with aesthetic value, or the introduction of contrasting urban features into natural areas or urban settings. Based on the *L.A. CEQA Thresholds Guide*, natural features may include, but are not limited to: open space; native or ornamental vegetation/landscaping; topographic or geologic features; and natural water sources. The loss of natural aesthetic features or the introduction of contrasting urban features may have a local impact, or, if part of a larger landscape, may contribute to a cumulative decline in overall visual character. Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.

Existing Aesthetic Environment

Within the Project Site and in the surrounding community, the aesthetic environment reflects a multitude of interspersed low-, mid-, and high-rise structures with commercial and residential uses and associated infrastructure. As shown in Figure B-1 on page B-4 and in Figure B-2 on page B-5, relative to surrounding development, the aesthetic environment is characterized by buildings that vary in age, architecture, height, massing, and materials.

With regard to the Project Site, the aesthetic character is not cohesive given the contrasting uses and building designs. In particular, the high-rise Elysian apartment building, which is operational, is adjacent to a portion of the Project Site that is no longer operational and has been neglected. Specifically, that portion of the Project Site includes four mid-rise buildings that were most

³ California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed February 22, 2018.

recently used as church facilities. The triangular road divider at Beaudry Avenue at Sunset Boulevard is paved and landscaped with trees and shrubs that are unmaintained and in poor condition. Therefore, the Project Site does not include urban features, such as historical resources, that may contribute to a valued aesthetic character. Natural features, including large expanses of open space, consistent plantings and landscaping, topographic or geologic features, and natural water sources are not present within and surrounding the Project Site. In addition, public plazas, consistent design elements, or pedestrian amenities and landscaped medians of importance are not located within or adjacent to the Project Site.

As provided in the Tree Report included in Appendix IS-1 of this Initial Study, trees considered protected within the City include oak trees indigenous to California but excluding scrub oak trees, Southern California black walnut trees, Western sycamore trees, and California bay laurel trees with a diameter at breast height of four inches or greater. According to the Tree Report, there is one coast live oak tree within the Project Site located generally on the northwestern portion of the Project Site, west of the Elysian apartment building.

Construction

During construction activities for the Project, the visual appearance of the Project Site would be altered due to the demolition of the existing structures and the presence of construction equipment. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. However, as is typical of construction sites, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

As discussed above, there is one onsite protected oak tree located within the Project Site. There are also 110 non-protected significant onsite trees and 41 street trees adjacent to the Project Site. All existing on- and off-site trees would be removed to accommodate the development of the Project. Based on the Tree Report, the onsite protected oak tree is not an appropriate candidate for transplant due to the age, size, and condition of the tree. In accordance with the requirements of the Urban Forestry Division, removal of the onsite protected oak tree would be replaced with four, minimum 24-inch box size trees. Acceptable species for the replacement trees include native oak, Western sycamore, California black walnut, and California bay laurel. The 110 on-site trees to be removed would be replaced on a 1:1 basis, while the street trees would be replaced on a minimum 2:1 basis.

Overall, while affecting the visual character of the Project Site and surrounding area on a short-term basis, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

Operation

As described above, there is a non-cohesive visual character that is evident throughout the vicinity of the Project Site. The area surrounding the Project Site contains an eclectic mix of buildings that vary in age, architecture, heights, massing, and materials. As illustrated in the Project renderings provided in Figure B-3 through Figure B-5 on pages B-9 through B-11, the Project would create an integrated site with a mix of residential, hospitality, office, and commercial uses within several new structures that would extend above and around a seven-level parking podium and be dispersed across the Project Site. The seven-level parking podium would be partially below grade and partially above grade. The portions of the parking podium that would be above grade would be wrapped in active uses or landscaping such that parking would not be visible from the street or surrounding uses. As shown in the renderings, buildout of the Project would increase the height, density, and mass of on-site structures as compared to existing conditions but would incorporate variations in building planes and other architectural features to reduce the effect of massing and provide a pedestrian scale adjacent to public streets. In terms of the overall change in visual character, the two high-rise residential towers in particular would create the highest degree of contrast relative to the surrounding environment, replacing existing low-rise structures with contemporary high-rise buildings.

Overall, as discussed above, the Project would not substantially degrade the existing visual character or quality of the Project Site or its surroundings, including valued existing features or resources, or introduce elements that would substantially detract from the visual character of the Project area. In addition, the Project would not remove, alter, or demolish elements that substantially contribute to the valued visual character of the neighborhood. Moreover, in accordance with Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

Shading

As provided in the *L.A. CEQA Thresholds Guide*, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. According to the *L.A. CEQA Thresholds Guide*, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Pursuant to the *L.A. CEQA Thresholds Guide*, the standard of significance for shading is if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).⁴

⁴ Timeframes have been adjusted from those specified in the *L.A. CEQA Thresholds Guide* to account for the new Daylight Saving Time period (second Sunday in March through the first Sunday in November), which went into effect in 2007 (per the Energy Policy Act of 2005) to reduce energy consumption. Prior to this change, the spring equinox occurred within Pacific Standard Time and was, therefore, subject to shading analysis between the hours of 9:00 A.M. and 3:00 P.M.



Figure B-3

Project Rendering from Sunset Boulevard and White Knoll Drive



Figure B-4
Project Rendering from Alpine Street and Beaudry Avenue



Figure B-5
Project Rendering facing Southwest

As previously discussed, surrounding uses in the general vicinity of the Project Site include commercial and residential uses. The surrounding residential uses could contain routinely useable outdoor spaces, such as yards and outdoor patios. As shown in the shadow diagrams provided in Figure B-6 through Figure B-9 on pages B-13 through B-16, Project shadows would move generally northwest to east across the surrounding landscape.

As shown in Figure B-6 on page B-13, during the spring equinox at 9:00 A.M., Project shadows would extend across the uses fronting Sunset Boulevard and the auto repair at Sunset Boulevard and White Knoll Drive. By 10:00 A.M., Project shadows would be mostly contained onsite. By 11:00 A.M., Project shadows would begin to extend towards the residential uses to the northeast-east and would continue through 5:00 P.M. Therefore, Project structures would shade potentially routinely useable outdoor spaces such as yards, courtyards, and/or outdoor patios associated with the surrounding residential uses for more than four hours during the spring equinox. However, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

As shown in Figure B-7 on page B-14, during the summer solstice, Project shadows would be mostly contained within the Project Site until approximately 1:00 P.M. when shadows would begin to extend towards the residential uses to the east and south. These shadows would continue through 5:00 P.M. Therefore, Project structures would shade potentially routinely useable outdoor spaces such as yards, courtyards, and/or outdoor patios associated with the surrounding residential uses for more than four hours during the summer solstice. However, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

As shown in Figure B-8 on page B-15, Project shadows during the fall equinox would be mostly contained onsite until approximately 11:00 A.M., when Project shadows would begin to extend towards the residential uses to the northeast-east and would continue through 5:00 P.M. Therefore, Project structures would shade potentially routinely useable outdoor spaces associated with the surrounding residential uses for more than four hours during the fall equinox. However, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

Shadow impacts are typically greatest during the winter months due to the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. As shown in Figure B-9 on page B-16, Project shadows would extend across surrounding residential uses from 9:00 A.M. through 3:00 P.M. Therefore, Project structures would shade potentially routinely useable outdoor spaces associated with the surrounding residential uses for more than three hours during the winter solstice. However, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impacts would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

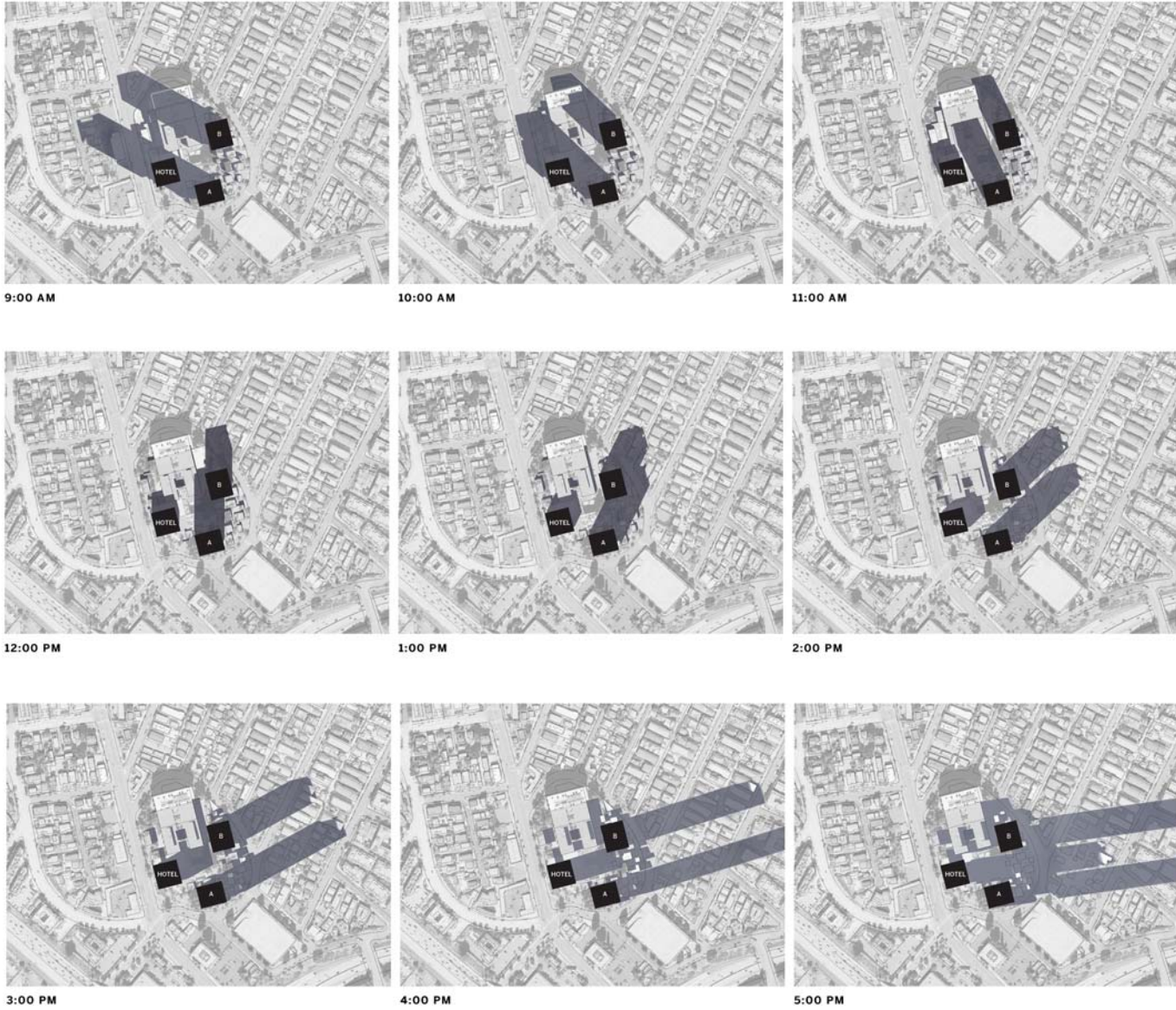


Figure B-6
Project Shadows—Spring Equinox

Source: Skidmore, Owings & Merrill LLP, 2018.

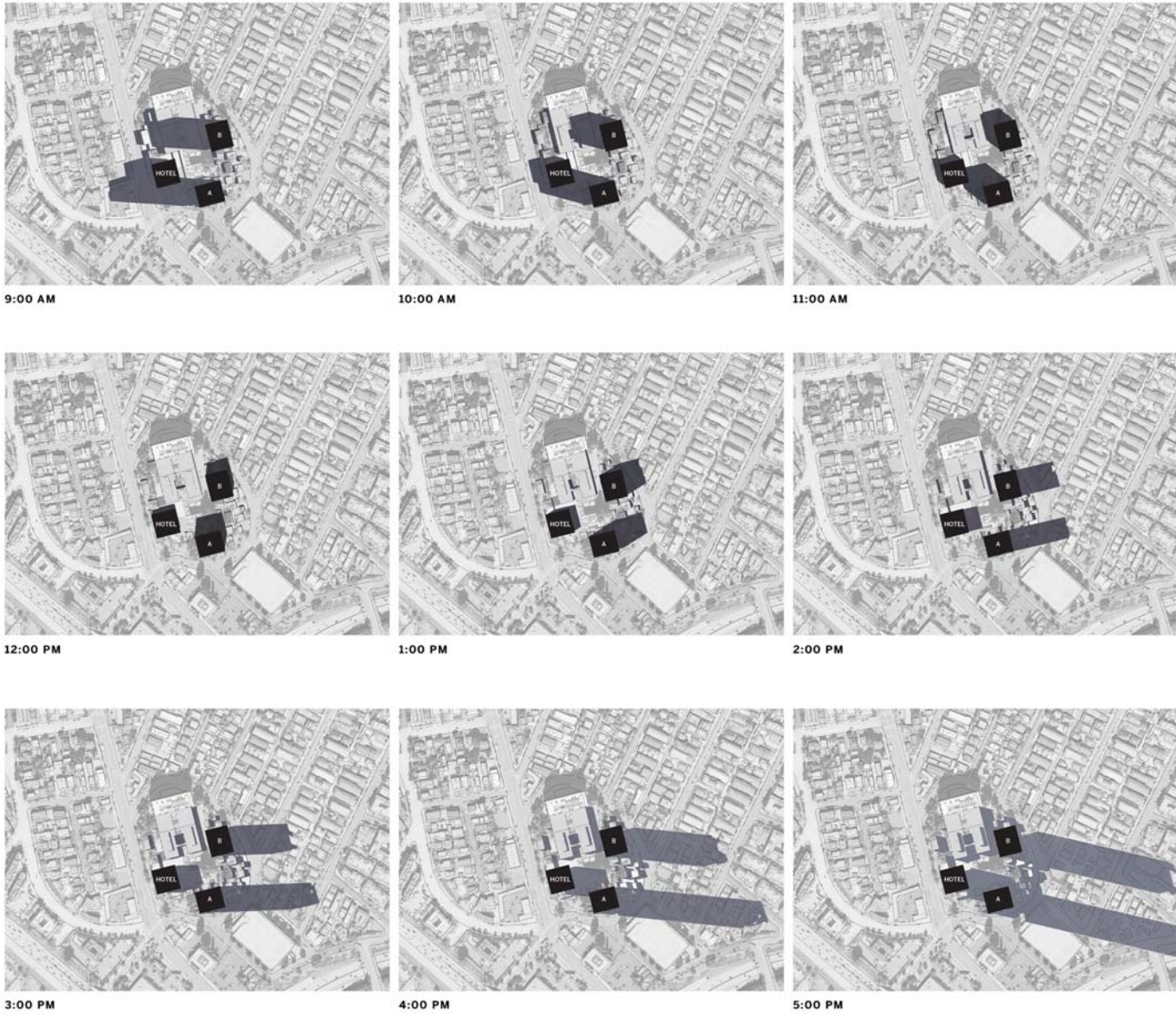


Figure B-7
Project Shadows—Summer Solstice

Source: Skidmore, Owings & Merrill LLP, 2018.



9:00 AM

10:00 AM

11:00 AM



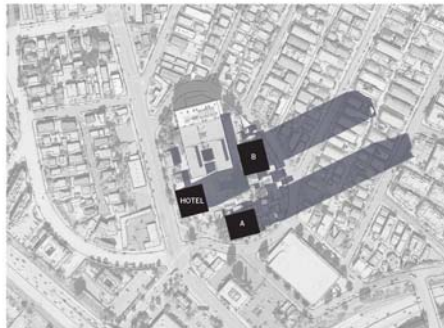
12:00 PM



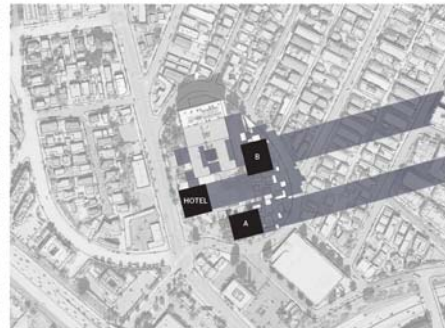
1:00 PM



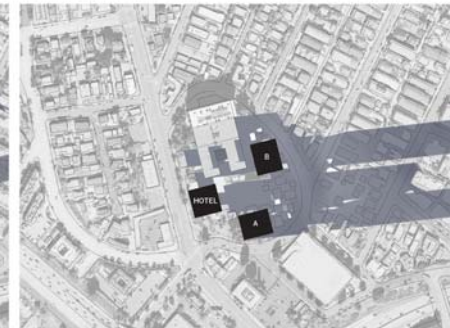
2:00 PM



3:00 PM



4:00 PM

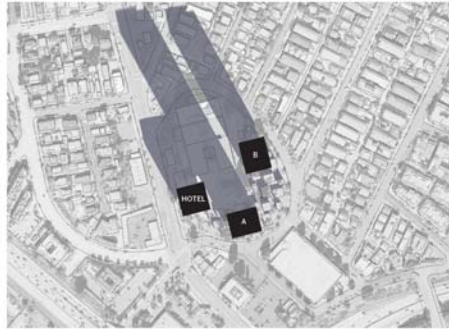


5:00 PM

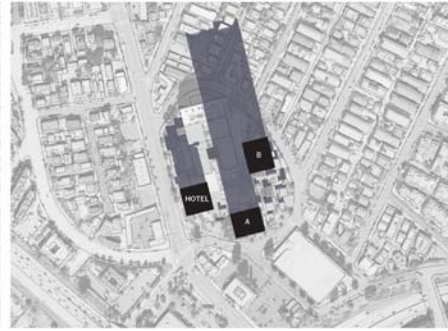
Figure B-8
Project Shadows—Fall Equinox



9:00 AM



10:00 AM



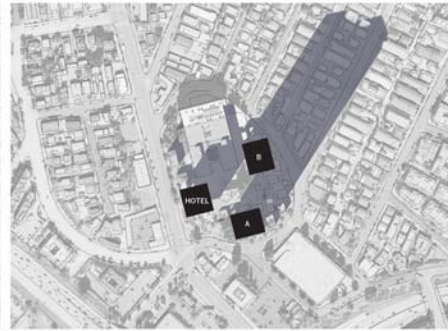
11:00 AM



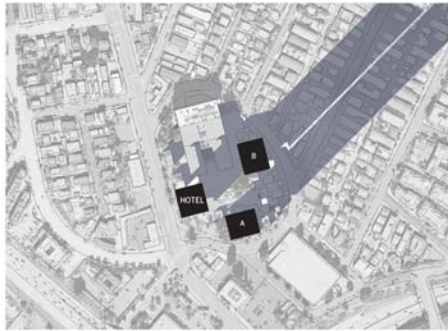
12:00 PM



1:00 PM



2:00 PM



3:00 PM

Figure B-9
Project Shadows—Winter Solstice

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

No Impact. As discussed in the *L.A. CEQA Thresholds Guide*, new light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. Based on the *L.A. CEQA Thresholds Guide*, this discussion considers the following factors from the *L.A. CEQA Thresholds Guide*: 1) the change in ambient illumination levels as result of project sources; and 2) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Construction

Lighting needed during Project construction has the potential to generate light spillover to off-site sensitive land uses in the Project Site vicinity, including the residential uses directly north and east of the Project Site. Construction activities would occur in accordance with the provisions of Los Angeles Municipal Code (LAMC) Section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, as part of the Project, construction lighting would be shielded such that no light source can be seen from adjacent residential properties. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as previously discussed, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Moreover, 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. Therefore, no further evaluation of this topic in the EIR is required.

Operation

As discussed above, the Project Site is located within a highly urbanized area of the City. Characteristic of an urban area, nighttime lighting in the Project Site vicinity results from numerous types of artificial light sources, including street lights, automobile lights, signage, residential and commercial building lights, and parking facilities. Existing lighting within the Project Site itself includes low to medium output security lighting, vehicle headlights, parking lot lighting, and interior lighting. Glare sources consist of vehicles on the Project Site. The existing structures on the Project Site consist largely of flat façades with windows located along the façades of the Elysian apartment building and along portions of the vacant church buildings; thus, the onsite structures themselves generate some glare.

As previously described, light-sensitive land uses include residential uses, some commercial and institutional uses, and natural areas. In the immediate vicinity of the Project Site, the nearest off-site receptors that are considered sensitive relative to light and glare and have views of the Project Site include existing residential uses that are immediately adjacent to the Project Site to the north and east. Additionally, motorists traveling along roadways in the Project Site vicinity may be sensitive to daytime glare.

The Project would replace the existing vacant buildings and associated surface parking areas on the Project Site with a new integrated, high-density, mixed-use development. As such, the Project would increase light and glare levels emanating from the Project Site. The Project would include lighting from within the buildings' interiors, lighting at the building exterior elevations, lighting from internal driveways and walkways, and limited lighting from the Elysian Parking Facility where there may be openings in the façade treatment. New sources of exterior lighting that would be introduced by the Project would include: shielded low to medium output exterior lighting on the buildings and along pathways for security and wayfinding purposes; shielded low to medium output lighting to accent signage, architectural features, exterior artwork or murals, and landscaping elements; outdoor decorative lights of low to medium output; and interior lighting visible through the windows of the residential, hotel, and commercial uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project signage and artwork would be illuminated by means of low to medium output external lighting, internal halo lighting, or ambient light. The Project would not include signs with flashing, mechanical, or strobe lights.

As detailed in the Lighting Memorandum included in Appendix IS-2 of this Initial Study, the proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior lighting would be shielded and/or directed toward the areas to be lit within the Project Site to avoid light spillover onto adjacent sensitive uses, and would be dark-sky compliant. Project lighting would also comply with regulatory requirements, including the requirements that are set forth by

CALGreen and Title 24 that stipulate the use of high performance light with appropriate light and glare control according to Backlight, Uplight, and Glare standards. Pursuant to Section 93.0117(b) of the LAMC, exterior light sources other than signage lighting would be designed so that lighting levels produced do not exceed two foot-candles above ambient lighting at the property line of the nearest residential property or light-sensitive receptor. Exterior lighting to highlight the Project's signage and artwork would be shielded or directed toward the areas to be lit to avoid creating off-site glare. In accordance with Section 14.4.4E of the LAMC, lighting used to illuminate Project signage would be limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by 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. In addition, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC of 3 foot-candles above ambient lighting or the lighting allowances of the California Energy Code and the CALGreen Code (Title 24, Part 6, and Part 11) as detailed in the Lighting Memorandum included in Appendix IS-2 of this Initial Study.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, and aluminum. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. In addition, windows on the upper levels of the mid-rise and high-rise buildings would include exterior shading elements including overhangs and architectural screens to further reduce glare.

Nighttime glare could result from illuminated signage and artwork, and from vehicle headlights. As described above, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC, the Energy Code, and the CALGreen Code. Furthermore, while headlights from vehicles entering and exiting certain of the parking levels would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Furthermore, light and glare associated with Project operation would not substantially alter the character of off-site areas surrounding the Project Site and would not result in a substantial adverse change in ambient nighttime levels in close proximity to light-sensitive uses. Moreover, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetic impact would not be considered significant. Therefore, no further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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"/> |

Would the project:

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in the Project Description of this Initial Study, the Project Site is currently developed with four vacant structures mostly recently used as church facilities, the Elysian apartment building, and associated surface parking areas. In addition, the uses surrounding the Project Site include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site.

The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.⁵ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

No Impact. The Project Site is zoned by the LAMC as C2-2D (Commercial Zone, Height District 2 with Development Limitation), which permits a variety of commercial uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.⁶ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the 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. As previously discussed, the Project Site is located in an urbanized area and is currently developed with four vacant structures (most recently used as church facilities), the Elysian apartment building, and associated surface parking areas. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses. The Project Site is not zoned for forest land and is not used as forest land.⁷ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

⁶ California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, 2016.

⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

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

No Impact. The Project Site is located in an urbanized area of the City and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.⁸ As such, the Project would not result in the conversion of farmland to non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

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. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Conflict with or obstruct implementation of the Air Quality Management Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District

⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

(SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead⁹). 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.¹⁰ 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 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.

With regard to the Project's consistency with the Congestion Management Program administered by the Metropolitan Transportation Authority (Metro), refer to Response to Checklist Question XVI.b, Transportation/Traffic, below.

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

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During operation of the Project, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, air quality standards could be violated. As such, the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

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

⁹ Partial Nonattainment designation for the Los Angeles County portion of the Basin only.

¹⁰ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM_{2.5} and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short term) and operation (long term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations. The EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. 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.

With respect to operation of the Project, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The Project would include residential, office, hotel, restaurant, and retail uses. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would be located in the subterranean parking garage and be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations.¹¹ Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹²

¹¹ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 5, 2018.

¹² SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed March 5, 2018.

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IV. BIOLOGICAL RESOURCES. Would the project:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game 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 federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The following analysis is based on the Biological Technical Report prepared for the Project by Glenn Lukos Associates, dated April 2018. The Biological Technical Report is included as Appendix IS-3 of this Initial Study.

Would the project:

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with four vacant structures, the Elysian apartment building, and associated surface parking areas. Landscaping within the Project Site includes unmaintained ornamental shrubs and trees dispersed throughout the Project Site. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. According to the Biological Technical Report, a habitat assessment for special-status plants found no areas capable of supporting special-status plants. In addition, according to the Biological Technical Report, no special-status animal species occur within the Project Site due to a lack of suitable habitat on the Project Site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.¹³ Additionally, while special-status plants and animals may occur within the study area as identified in the California Native Plant Society Online Inventory of Rare and Endangered Plants of California and the California Natural Diversity Database, based on biological surveys conducted on the Project Site, no special-status plants or animals were found on the Project Site. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with vacant structures, the Elysian apartment building, and surface parking. No riparian or other sensitive natural community exists on the Project Site.^{14,15} Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.¹⁶ In addition, there are no other sensitive natural communities identified by the California Department of Fish and Game or the US Fish and Wildlife Service.^{17,18,19}

¹³ 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.

¹⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 2, 2017.

¹⁵ United States Environmental Protection Agency, NEPAAssist, www.epa.gov/nepa/nepassist, accessed November 2, 2017.

¹⁶ 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.

¹⁷ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed November 2, 2017.

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 mitigation measures are required. 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 pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is currently developed with vacant structures, the Elysian apartment building, and surface parking. In addition, the surrounding area has been fully developed and no water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the vicinity of the Project Site.²⁰ As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, 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 with Mitigation Incorporated. As described above, the Project Site is located in an urbanized area and is currently developed with vacant structures, the Elysian apartment building, and surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space within and surrounding the Project Site that provide linkages to natural open spaces areas and which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.²¹ As concluded in the Biological Technical Report, the entire study area is surrounded by dense urban development and exhibits no potential as a wildlife corridor.

As discussed in the Biological Technical Report, the Project Site includes groundcover, trees, and shrubs that have the potential to support nesting birds and nesting raptors. Therefore, the on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. As provided in the Biological Technical Report, avian surveys conducted during the raptor nesting season did not detect raptor nesting and, as such, nesting raptors are not expected to occur on the Project Site. Notwithstanding, the Project Site supports a number of mature Canary Island pines that exhibit suitable structure for nesting raptors. Therefore, Mitigation Measure BIO-

¹⁸ California Department of Fish and Wildlife, CDFW Lands, <https://www.wildlife.ca.gov/Lands>, accessed November 2, 2017.

¹⁹ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed November 2, 2017.

²⁰ United States Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed November 2, 2017.

²¹ 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.

MM-1 is provided below to ensure that raptors are protected if found nesting on the Project Site at the time construction activities for the Project commence. With regard to nesting birds, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. To ensure compliance with the Migratory Bird Treaty Act, the Project would implement Mitigation Measure BIO-MM-2, below. In accordance with Mitigation Measure BIO-MM-2, tree removal activities would take place outside of the nesting season (February 1–August 31; February 1–June 30 for Raptors), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, Mitigation Measure BIO-MM-2 would provide that a biological monitor be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. With implementation of Mitigation Measure BIO-MM-2, the potential impact would be reduced to less than significant. No further evaluation of this topic in the EIR is required.

BIO-MM-1: If feasible, the removal of vegetation shall occur outside of the raptor nesting season, generally recognized as February 1 to June 30. If vegetation removal must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any vegetation removal. If active nests are identified, the biologist shall flag vegetation containing active nests. The biologist shall establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers shall be based on the species identified, but generally will consist of 300 feet for raptors as determined by the Project Biologist. If for some reason, it is not possible to remove all vegetation during the non-nesting season, then vegetation to be removed during the nesting season must be surveyed by a qualified biologist no more than three days prior to removal. If no raptors are found, the vegetation can be removed. If nesting raptors are detected, then removal must be postponed until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Furthermore, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Similarly, for vegetation being preserved, if construction is to occur during the nesting season, preserved vegetation should be surveyed for the presence of nesting birds. If nesting raptors are detected, the biologist shall establish a 300-foot buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. If feasible, the demolition shall occur outside of the nesting season, generally recognized as February 1 to June 30 because of the potential for indirect impacts to nearby nests.

If demolition must occur during the raptors nesting season, then a qualified biologist shall conduct a nesting raptors survey prior to any demolition. If active nests are identified, the biologist shall flag active nests and establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will consist of 300 feet for raptors.

BIO-MM-2: If feasible, the removal of vegetation should occur outside of the nesting season, generally recognized as March 15 to August 15. If vegetation removal must occur during the nesting season, then a qualified biologist shall conduct a

nesting bird survey prior to any vegetation removal. If active nests are identified, the biologist shall flag vegetation containing active nests. The biologist shall establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will be based on the species identified, but generally will consist of 50 feet as determined by the Project Biologist. If for some reason, it is not possible to remove all vegetation during the non-nesting season, then vegetation to be removed during the nesting season must be surveyed by a qualified biologist no more than three days prior to removal. If no nesting birds are found, the vegetation can be removed. If nesting birds are detected, then removal must be postponed until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Furthermore, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed. Similarly, for vegetation being preserved, if construction is to occur during the nesting season, preserved vegetation shall be surveyed for the presence of nesting birds. If nesting birds are detected, the biologist shall establish an appropriate buffer zone where construction activity may not occur until the fledglings have vacated the nest or the biologist has determined that the nest has failed.

If feasible, building demolition should occur outside of the avian nesting season, generally recognized as March 15 to August 31 because of the potential for many urban-adapted birds to utilize cavities and other openings of the building. If demolition must occur during the nesting season, then a qualified biologist shall conduct a nesting bird survey prior to any demolition. If active nests are identified, the biologist shall flag active nests and establish appropriate buffers around active nests to be avoided until the nests are no longer active and the young have fledged. Buffers will be based on the species identified, but generally will extend of 50 feet from the nest site.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) 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 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 ordinance and are not considered protected. The City of Los Angeles 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 4:1 basis with trees that are of a protected variety.

As previously discussed, there is one protected oak tree located within the Project Site. The Tree Report included in Appendix IS-1 of this Initial Study also identified 110 non-protected significant onsite trees and 41 street trees located within the proposed construction area. All identified, existing on- and off-site trees within the proposed construction area would be removed to accommodate the

development of the Project. Based on the Tree Report, the onsite protected oak tree is not an appropriate candidate for transplant due to the age, size, and condition of the tree. In accordance with the requirements of the Urban Forestry Division, removal of the onsite protected oak tree would be replaced with four, minimum 24-inch box size trees. Acceptable species for the replacement trees include native oak, Western sycamore, California black walnut, and California bay laurel. In addition, the 110 on-site non-protected trees to be removed would be replaced on a 1:1 basis, while the street trees would be replaced on a minimum 2:1 basis. Therefore, with compliance with City requirements regarding tree replacement, impacts would be less than significant, and no mitigation measures are required. 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 developed with vacant structures, the Elysian apartment building, and surface parking. As previously described, landscaping within the Project Site consists of unmaintained ornamental trees and shrubs within portions of the Project Site. The Project Site does not support any habitat or natural community.^{22,23} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.²⁴ 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 mitigation measures are required. No further evaluation of this topic in the EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES: Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in § 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

²² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

²³ United States Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed November 2, 2017.

²⁴ California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed November 2, 2017.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Cultural and Paleontological Resource Evaluation and Impact Assessment (Cultural and Paleontological Resource Assessment) prepared for the Project by Statistical Research, Inc., dated February 2018. The Cultural and Paleontological Resource Assessment is included as Appendix IS-4 of this Initial Study.

Would the project:

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 generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

Based on the age of the existing structures, their association with MWD, and on the merits of their modernist architectural design by William Pereira and Associates, the existing buildings on the Project Site were requested to be nominated as historical resources. Under the Cultural Heritage Ordinance, if the Cultural Heritage Commission elects to undertake review of a nomination request, as they did for the existing former MWD buildings, the Cultural Heritage Commission has 75-days to act on the nomination request or the nomination is deemed denied. On September 15, 2016, upon review of the nomination request, the Cultural Heritage Commission voted 2 to 2. A tie vote is deemed non-action. The 75-day review period expired on October 4, 2016. On October 4, 2016, the nomination application was deemed denied. An evaluation of the Project Site as part of SurveyLA determined that while the Project Site could be significant as a rare complex of 1960s-1970s institutional development and as a work of architect William L. Pereira, the Project Site has undergone substantial modifications over time and further research is needed to determine if the Project Site

retains sufficient integrity to convey its significance.²⁵ Therefore, a detailed evaluation of the Project's potential to result in impacts to historical resources will be provided in the EIR.

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

Less Than Significant with Mitigation Incorporated. Section 15064.5(a)(3)(D) of the CEQA Guidelines 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.

As described in detail in the Cultural and Paleontological Resource Assessment included in Appendix IS-4 of this Initial Study, historical maps of the Project Site indicate the Project Site was developed as a park (named Beaudry Park) in 1873. In 1881, Beaudry Park at the Project Site was advertised for sale and was acquired by the Sisters of Charity. The Sisters of Charity built an L-shaped hospital of pressed brick at the Project Site. During the time the Sisters of Charity occupied the Project Site, an oil discovery in 1892 led to an oil drilling boom in City town lots and the Los Angeles City Oil Field was created. The Los Angeles City Oil Field ran in a roughly westerly direction from Elysian Park for a distance of approximately 4.5 miles. The Project Site is located within the East Field portion of the Los Angeles City Oil Field, with the Project Site specifically marking the western extent of the East Field. Based on the Cultural and Paleontological Resource Assessment, wells in the East Field produced satisfactorily at the start but waned quickly, operating only between two and 13 years. Oil drilling on a portion of the Project Site continued through the early 1900s under a 10-year lease that gave the Sisters of Charity rights to oil on their property. In November 1927, the Sisters of Charity moved their hospital to a new facility in the Westlake District. The hospital at the Project Site remained vacant and the hospital was likely demolished between 1932 and 1934. The nurses' residences constructed in 1914, a shrine, and stairs remained on the Project Site until the Project Site was redeveloped by the Metropolitan Water District of Southern California (MWD) in 1959. Specifically, MWD began construction of the MWD Sunset Boulevard Headquarters Campus in 1961 and construction of the buildings was completed in 1963. An additional office tower annex (herein referred to as the existing Elysian apartment building) was later built in 1973. MWD moved from the Project Site in 1993. The Holy Hill Community Church purchased the property in 1994. The Holy Hill Community Church constructed an additional building (Building 5 as identified in Figure A-2 in Attachment A, Project Description, of this Initial Study), which was constructed in 1998. The Holy Hill Community Church vacated the Project Site in 2014. Currently, the church buildings are vacant.

As provided in the Cultural and Paleontological Resource Assessment, based on a records search conducted by the South Central Coastal Information Center (SCCIC), there are five cultural resources mapped by the SCCIC within a quarter mile of the Project Site. One of the five cultural

²⁵ City of Los Angeles, Office of Historic Resources. SurveyLA Findings and Reports, Central City North Historic Districts, Planning Districts, and Multi-Property Resources, September 2016, https://preservation.lacity.org/sites/default/files/CentralCityNorth_HistoricDistricts.pdf.

resources includes the Holy Hill Community Church/MWD Complex located within the Project Site. The property was assessed to lack the integrity necessary to be listed in the National Register of Historic Places. The remaining four resources include two historical districts (the Arroyo Seco Parkway District part of which is located approximately 0.2-mile from the Project Site and the 1300 Block of Carroll Avenue District located approximately 0.5-mile from the Project Site), a historical period residence (the Joseph Moffat Rental Cottage) located approximately 230 feet from the Project Site, and a trash deposit containing historical period materials and some potentially prehistoric materials discovered during construction of the E. Manfred Evans Community Adult School located approximately 0.2-mile from the Project Site.

According to the Cultural and Paleontological Resource Assessment, construction of the MWD Sunset Boulevard Headquarters Campus buildings and the Holy Hill Community Church building likely destroyed subsurface remains of historical-period and prehistoric activities within the footprints of the buildings, particularly where basements were excavated. However, there is a potential for the presence of intact archaeological remains outside the current building footprints and throughout the remainder of the Project Site. As discussed in the Project Description of this Initial Study, the Project would require excavations up to 64 feet below grade that could have the potential to disturb previously undiscovered archaeological resources. Therefore, the Project could cause a substantial adverse change in the significance of an archaeological resource. However, with implementation of CUL-MM-1 below, potential impacts to any previously undiscovered archaeological resources would be reduced to less than significant. As such, impacts to archaeological resources would be less than significant with mitigation incorporated.

CUL-MM-1: Prior to the start of Project ground disturbance, including demolition and vegetation removal, a qualified principal archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Historical Archeology shall be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project effects on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan shall include the professional qualifications required of key staff, monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, situations under which monitoring may be reduced or discontinued, and reporting requirements. The Cultural Resource Monitoring and Treatment Plan shall also include a section describing the protocol in the event that unanticipated human remains are discovered during Project construction.

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

Less Than Significant with Mitigation Incorporated. 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. According to the Cultural and Paleontological Resource Assessment included in Appendix IS-4 of this Initial Study, the underlying geologic strata of the Project Site includes sediments of the Puente Formation, Quaternary-age old alluvial deposits, colluvial deposits, and artificial fill.

As explained in the Cultural and Paleontological Resource Assessment, the Puente Formation is a marine unit consisting of siltstones, sandstones, and shales. Paleontological resources are well known from the Puente Formation and have produced remains of marine mammals, fish, sharks, birds, turtles, invertebrates, and plant material. According to a records search of the paleontological specimen and locality records held by the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles (NHMLA), there no vertebrate-fossil localities recorded in the NHMLA paleontology collection records that lie directly within the Project Site. However, several nearby localities were found in sedimentary deposits similar to those underlying the Project Site. The closest comparable vertebrate-fossil locality, LACM 5961, is located roughly 0.85 miles south-southeast of the Project Site, at the intersection of 1st Street and Hill Street. That locality produced a fossil specimen of a deep-sea bristlemouth fish, *Cyclothone*. An additional 13 fossil localities have been documented in similar Puente Formation deposits within 3.5 miles of the Project Site. The specimens identified in those localities include a wide variety of fossil marine bony fishes and a fossil whale rib.

Quaternary old alluvial deposits are extensively exposed throughout portions of the Los Angeles Basin and date to the middle to late Pleistocene. Paleontologically significant finds of well-preserved large-bodied land mammals have been found within the Pleistocene-age alluvial deposits throughout Los Angeles County, as well as in nearby Orange and Riverside Counties. These deposits have yielded remains of mammoths, mastodons, camels, bison, ground sloths, dire wolves, and American lions, among others. Plant remains, terrestrial invertebrates, and microfossils (especially micromammals) are also known from similar deposits throughout the Los Angeles Basin. Based on these regional discoveries of important paleontological resources, the Quaternary old alluvial fan deposits²⁶ underlying the Project Site would most likely have similar deposits to other finds in the region and therefore, have high paleontological resource potential.

Colluvium is a type of mass-wasting²⁷ deposit composed of sediments that were transported by gravity, rain wash, sheetwash, and/or non-channelized flow. These deposits form along the slopes and at the bases of topographic features. The colluvial deposits within the Project Site are likely Holocene to latest Pleistocene in age. This relatively young age means that fossil remains recovered from these deposits would likely have been reworked from older geologic units and thus would lack the stratigraphic context to make them scientifically informative. Therefore, the colluvial deposits underlying the Project Site are assigned low paleontological resource sensitivity.²⁸

²⁶ Alluvial fan deposits are deposits of gravel, sand, and sediment such as silt that are carried by flowing water.

²⁷ Mass wasting or mass movement refers to the movement of a large mass of rock, soil, and debris downward due to the pull of gravity.

²⁸ Cultural and Paleontological Resource Assessment, page 36, Appendix IS-4 of this Initial Study.

Artificial fill materials are deposits presumably derived from prior construction activities and are thus not naturally forming. The maximum depth of fill encountered on the Project Site was approximately 10.5 feet below ground surface.²⁹ These disturbed fill sediments could potentially contain fossil materials that were unintentionally introduced during earlier excavations. However, such fossil materials would have been removed from their original geologic and stratigraphic contexts and thus would not be of paleontological interest or significance. Artificial fill materials are thus assigned zero paleontological resource sensitivity.

Although no localities have been identified within the Project Site, the known significant fossil finds from the Puente Formation and the richness of nearby localities with similar depositional regimes and geologic ages are indicative of the high fossil sensitivity for this unit. Any excavation into the Puente Formation therefore has the potential to encounter significant vertebrate fossil remains. As discussed in the Project Description of this Initial Study, the Project would require excavations up to 64 feet below grade, which could potentially disturb previously undiscovered paleontological resources. Therefore, the Project could directly destroy a unique paleontological resource. However, with implementation of CUL-MM-2 below, potential impacts to any previously undiscovered paleontological resources would be reduced to less than significant. As such, impacts to paleontological resources would be less than significant with mitigation incorporated.

The Project Site is currently developed with vacant structures, the Elysian apartment building, and surface parking. There are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature.

CUL-MM-2: The services of a qualified paleontologist shall be retained prior to earthmoving activities associated with the Project in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan. The Paleontological Resource Mitigation and Treatment Plan shall specify the levels and types of mitigation efforts based on the types and depths of earthmoving activities and the geologic and paleontological sensitivity of the Project Site. If artificial fill, significantly disturbed deposits, or younger deposits too recent to contain paleontological resources are encountered during construction, the Project paleontologist may reduce or curtail monitoring in the affected areas, after consultation with the proponent and the City of Los Angeles. The Paleontological Resource Mitigation and Treatment Plan shall also include a description of the professional qualifications required of key staff, communication protocols during construction, fossil recovery protocols, sampling protocols for microfossils (if required), laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens.

²⁹ Geotechnologies, Inc. Geotechnical Engineering Investigation. October 10, 2017; Revised January 10, 2018. Refer to Appendix IS-5 of this Initial Study.

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

Less Than Significant Impact. The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. As discussed in the Cultural and Paleontological Resource Assessment, the likelihood that human remains of historical or prehistoric age are preserved within the Project Site is low. Based on historical research conducted as part of the Cultural and Paleontological Resource Assessment, no references to burials on the property in association with the operation of the Sisters' Hospital (St. Vincent Hospital) were found. Although the disposal of medical waste from surgeries and amputations is sometimes not recorded, the historical research conducted found no indication of such activity. Further, extensive disturbances associated with the construction of the MWD complex have likely removed both historical-period deposits associated with the former hospital as well as any prehistoric deposits that may have existed within the Project Site. The possibility of encountering human interments from the prehistoric era is, therefore, also unlikely. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with state law, including CEQA Guidelines Section 15064.5(e), Public Resources Code Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the relevant portion of the Project Site would be suspended, and the Los Angeles Department of Public Works (LADPW) as well as the County Coroner would be notified immediately. 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 NAHC guidelines would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant, and no mitigation measures would be required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VI. GEOLOGY AND SOILS. Would the project:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<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"/>

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. In accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the project would have a significant impact related to geology and soils if it would result in any of the following impacts.

The following analysis is based on the Geotechnical Engineering Investigation conducted for the Project Site by Geotechnologies, Inc., dated October 10, 2017, revised January 10, 2018. This report is included as Appendix IS-5 of this Initial Study.

Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Potentially 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, 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 California Geological Survey 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 located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area.³⁰ However, according to the Geotechnical Engineering Investigation, based on geologic maps, there is an unnamed fault that traverses the western side of the Project Site. While the unnamed fault is not designated as an Earthquake Fault Zone and the unnamed fault is not considered active, further review of the geologic unit underlying the Project Site, including as it relates to the unnamed fault, has been requested by the Los Angeles Department of Building and Safety (refer to Appendix IS-5 of this Initial Study). Therefore, further analysis will be provided in the EIR.

³⁰ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. Further analysis of the potential for the Project to cause in part or in whole strong seismic ground shaking will be provided in the EIR.

iii) Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially 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. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations. Neither the City of Los Angeles or the State of California classifies the Project Site as part of a potentially liquefiable area.^{31,32} Nonetheless, given the proximity of the Project Site to a fault, further analysis of the Project's potential to exacerbate existing environmental conditions which could result in seismic-related ground failure will be included in the EIR.

iv) Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is not located in a landslide area as mapped by the State,³³ nor is the Project Site mapped as a landslide area by the City of Los Angeles.^{34,35} While the Project Site has a grade difference of approximately 51 feet from the Project Site's eastern portion to the Project Site's western portion, the Project Site is currently mostly paved and developed with four vacant buildings and the Elysian apartment building. Therefore, the Project Site does not currently include expanses of exposed soils which could result in a landslide during a rain event. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, the Project would not exacerbate existing conditions that could cause in whole or in part landslides that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

³¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 5, 2018.

³² State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

³³ State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

³⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

³⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 2, 2017.

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

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to ensure that substantial soil erosion does not occur. 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. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, including the National Pollutant Discharge Elimination System Permit requirements and City grading requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Potentially Significant Impact. As discussed above, the Project Site is susceptible to ground shaking. Thus, the potential of the Project to cause in whole or in part a geologic unit to become unstable and potentially result in lateral spreading, subsidence, and collapse will be addressed in the EIR. In addition, as discussed in Checklist Question No. VI(a)(iii), potential liquefaction impacts will also be addressed in the EIR. As discussed above in Response to Checklist Question No. VI(a)(iv) impacts associated with landslides would not occur as part of the Project.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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. According to the Geotechnical Engineering Investigation included in Appendix IS-5 of this Initial Study, the onsite geologic materials are in the very low to low expansion range. In addition, the Project would not inject water into the soil that could cause the swelling and drying of water. Therefore, the Project would not be located on expansive soil, which could create substantial risks to life or property cause in whole or in part by the Project's exacerbation of the existing environmental conditions. Thus, impacts would be less than significant, and no mitigation measures are required. 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 sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, 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. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VII. GREENHOUSE GAS EMISSIONS. Would the project:

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input 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"/> |

Would the project:

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill 32, the City of Los Angeles Green Building Code, and SCAG's RTP/SCS).

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 caused in whole or in part from the project's exacerbation of existing environmental conditions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project's exacerbation of existing environmental conditions? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically,

the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents. In accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts.

Would the project:

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

Potentially Significant Impact. The majority of the structures within the Project were constructed in approximately 1961, prior to the enactment of laws preventing the use of asbestos-containing materials, polychlorinated biphenyls, and lead based paint. Therefore, these hazardous materials may be present on the Project Site. In addition, construction and operation of the Project could involve the use of potentially hazardous materials. As such, further analysis regarding the Project's transport, use, or disposal of hazardous materials would be provided in the EIR.

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

Potentially Significant Impact. The majority of the structures within the Project were constructed in approximately 1961, prior to the enactment of laws preventing the use of asbestos-containing materials, polychlorinated biphenyls, and lead based paint. Therefore, these hazardous materials may be present on the Project Site. In addition, construction and operation of the Project could involve the use of potentially hazardous materials. As such, further evaluation of this topic would be provided in the EIR.

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

Potentially Significant Impact. Schools within a one-quarter mile of the Project Site include Downtown Magnets High School located at 1081 West Temple Street and Betty Plasencia Elementary School located at 1321 Cortez Street. Therefore, given the potential of the Project to emit or handle hazardous materials during construction, further evaluation of this topic will be included in the EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. A detailed database search will be conducted as part of the EIR. As such, further analysis of this topic will be included in the EIR.

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

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Bob Hope Airport, located approximately 14 miles northwest of the Project Site. Given the distance between the Project Site and Bob Hope Airport, the Project would not have the potential to result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 20 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not have the potential to result in a safety hazard. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

Potentially Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Sunset Boulevard, which is adjacent to the Project Site.³⁶ Construction and operation of the Project would generate vehicular traffic that would utilize this street. As such, potential impacts associated with emergency response will be further evaluated in the EIR.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including, where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, caused in whole or in part from the project’s exacerbation of existing environmental conditions?

³⁶ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

Less Than Significant Impact. 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,³⁷ nor is it located within a City-designated fire buffer zone.³⁸ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not exacerbate existing environmental conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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IX. HYDROLOGY AND WATER QUALITY. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Violate any water quality standards or waste discharge requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

³⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed November 2, 2017. 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.

³⁸ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

Potentially Significant Impact. Construction activities associated with the Project would have the potential to result in the conveyance of pollutants into municipal storm drains. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of stormwater runoff. While compliance with regulatory requirements would be expected to address potential water quality impacts, further analysis of this issue will be included in the EIR.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Potentially Significant Impact. The Project would involve grading across the entire Project Site and excavations up to 64 feet below ground surface. As such, the potential exists for existing percolation of rainwater and irrigation water into the water table to be diminished, which could affect groundwater recharge. In addition, the proposed excavation activities could potentially encounter groundwater. Therefore, further analysis of this topic will be included in the EIR.

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

Potentially Significant Impact. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Potentially Significant Impact. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site. Therefore, further analysis of this issue will be included in the EIR.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. The Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site and contribute additional runoff. In addition, construction activities associated with the Project would have the potential to result in the conveyance of pollutants into municipal storm drains. Potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could also affect the quality and quantity of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

f) Otherwise substantially degrade water quality?

Potentially Significant Impact. As discussed above in Response to Checklist Question IX.a, construction activities associated with the Project would have the potential to result in the conveyance of pollutants into municipal storm drains. In addition, potential changes in on-site drainage patterns resulting from Project operation and the introduction of new land uses could affect the quality and quantity of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency or by the City of Los Angeles.^{39,40} Thus, the Project

³⁹ Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1628F, effective September 26, 2008.

would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in the EIR is required.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Potentially Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. The Safety Element of the City of Los Angeles General Plan does map the Project Site as being located within a potential Inundation Area.⁴¹ The nearest levee is along the Los Angeles River located approximately 1.2 miles east of the Project Site. The Los Angeles River includes a sunken concrete lined channel; therefore, flooding, including flooding as a result of the failure of a levee or dam is unlikely, particularly given the Project Site's elevation above mean sea level and distance of the Project Site from the Los Angeles River. Notwithstanding, the U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion nearest to the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Nino storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. However, exposure to flooding onsite as a result of groundwater present in soil conditions is possible, as noted in a letter from the Department of Building and Safety and the geotechnical report. Historically high groundwater is expected to be 20 feet below ground surface and groundwater was encountered at 16 feet below ground surface in soil borings conducted for the geotechnical report. As water was encountered at that depth and the proposed depth of the subterranean parking is 64 feet below ground surface, risk is present. Therefore, further analysis of this issue will be included in the EIR.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly

⁴⁰ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

⁴¹ Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is not located adjacent to or in proximity to the ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.⁴² The Los Angeles River is located approximately 1.2 miles east of the Project Site, but includes a sunken concrete lined channel; therefore, inundation as a result of seiche is unlikely, particularly given the Project Site's elevation above mean sea level. As discussed above, the Project Site and surrounding area are fully developed. In addition, the Project Site is not mapped by either the State or the City as being located in an area prone to landslides. As such, the potential for the Project Site to be inundated by mudflows is low. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. LAND USE AND PLANNING. Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. As discussed in the Project Description of this Initial Study, the vicinity of the Project Site is developed primarily with commercial and residential uses. Specifically, further north of the Elysian apartment building, across White Knoll Drive are additional multi-family residential uses and an auto repair shop at White Knoll Drive and Sunset Boulevard. Expanses of multi-family residential uses continue east of the Project Site, across Alpine Street. South of the Project Site, across Beaudry Avenue, is structured parking and commercial uses. West of the Project Site, across Sunset Boulevard, is a motel, a nightclub, and multi-family residential uses.

⁴² City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

The Project would replace the existing vacant structures within the Project Site with a new infill mixed-use project. In addition, while the Project would merge a portion of Beaudry Avenue and Sunset Boulevard adjacent to the Project Site, access would continue to be available through Beaudry Avenue at Sunset Boulevard. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the EIR will provide further analysis of whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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

No Impact. As discussed above in Response to Checklist Question IV, Biological Resources, the Project Site is located in an urbanized area and is currently developed with four vacant structures, the Elysian apartment building, and surface parking. As discussed in the Biological Technical Report included in Appendix IS-3 of this Initial Study, the Project Site does not support any habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.⁴³ 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 mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES. Would the project:

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

⁴³ California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed November 2, 2017.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

The following analysis is based on the Oil Well Report prepared for the Project by Geosyntec Consultants, dated March 2, 2018. This report is included as Appendix IS-6 of this Initial Study.

Would the project:

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{44,45,46} As previously discussed in Checklist Question V, Cultural Resources, the Project Site is located within the Los Angeles City Oil Field. Specifically, the Project Site is located within the East Field portion of the Los Angeles City Oil Field, with the Project Site marking the western extent of the East Field. As described in the Oil Well Report, the Los Angeles City Oil Field is an old oil field and one of the first to be discovered in the Los Angeles Basin. The Los Angeles City Oil Field is east-west trending and is approximately 18,500 feet long and 1,000 feet wide. Based on a historical map from 1903, eight oil well heads were located onsite, including five standard oil wells and three well heads. As discussed in the Cultural and Paleontological Resource Assessment, wells in the East Field produced satisfactorily at the start but waned quickly, operating only between two and 13 years. Oil drilling on a portion of the Project Site continued through the early 1900s under a 10-year lease that gave the Sisters of Charity rights to oil on their property. Oil drilling and extraction on the Project Site has not occurred since then and no producing oil wells exist on the Project Site. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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?

⁴⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁴⁵ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁴⁶ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{47,48,49} As discussed above in Response to Checklist Question XI.a, while the Project Site is located within the Los Angeles City Oil Field, no producing oil wells exist on the Project Site. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. NOISE. Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴⁷ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁴⁸ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁴⁹ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

Would the project:

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

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, because the Project would introduce new uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. Furthermore, construction and operational traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. No operational vibration impacts are anticipated given the potential Project uses. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of an airport. The closest airport to the Project Site is Bob Hope Airport, located approximately 14 miles northwest of the Project Site. Given the distance between the Project Site and Bob Hope Airport, the Project would not expose people residing or working in the Project area to excessive noise

levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

f) For a project located within the vicinity of a private airstrip, 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. The nearest private airstrip is the Los Alamitos Army Airfield, located approximately 20 miles southeast of the Project Site. Given the distance between the Project Site and the Los Alamitos Army Airfield, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING. Would the project:

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|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Would the project:

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

Potentially Significant Impact. The Project would result in the construction of new residential dwelling units. In addition, the Project would introduce new office, hotel, and commercial uses to the Project Site. As such, the Project would introduce residential and daytime population growth in the area. Therefore, further analysis of this topic in the EIR is required.

b) Displace substantial numbers of existing 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 necessitating the construction of replacement housing elsewhere. No impacts

would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons necessitating the construction of replacement housing elsewhere. No impact would occur and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. 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:

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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:

a) Fire protection?

Potentially Significant Impact. The City of Los Angeles Fire Department provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and increase the residential population, which could result in the need for new or physically altered Los Angeles Fire Department facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this issue will be included in the EIR.

b) Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new residential, commercial, office, and hotel uses to the Project Site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

c) Schools?

Potentially Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District. The Project would include the development of residential uses, which would generate a demand for educational services and school facilities, the construction of which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

d) Parks?

Potentially Significant Impact. The development of residential uses as part of the Project would increase the number of residents at the Project Site that could utilize nearby parks and/or recreational facilities, possibly necessitating new parks, the construction of which could cause significant environmental impacts. Thus, the EIR will provide further analysis of this issue.

e) Other public facilities?

Potentially Significant Impact. The development of residential uses as part of the Project would generate a new population that would generate a demand for library services provided by the Los Angeles Public Library, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, the EIR will provide further analysis of this issue.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. RECREATION.

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

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

Potentially Significant Impact. The development of residential uses as part of the Project would increase the number of residents at the Project Site that could utilize City parks and/or recreational facilities, possibly resulting in the physical deterioration of those facilities. Thus, the EIR will provide further analysis of this issue.

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

Potentially Significant Impact. The Project would not include the development of public recreational facilities. However, the Project would increase the number of residents at the Project Site that could utilize nearby recreational facilities, possibly necessitating the construction or expansion of new recreational facilities, which might have an adverse physical effect on the environment. Therefore, the EIR will provide further analysis of this topic.

Additionally, the Project would include development of private open space and recreational amenities associated with its residential component. The potential impacts associated with construction of these facilities will be further analyzed in the EIR for those topics where impacts could be potentially significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVI. TRANSPORTATION/TRAFFIC. Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project proposes development that would result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project 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. Once construction is completed, the Project’s residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area’s transportation facilities could conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. Therefore, further analysis of this issue will be provided in the EIR.

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

Potentially Significant Impact. Metro administers the Congestion Management Program, a State-mandated program designed to address the impacts urban congestion has on local communities and the region as a whole. The Congestion Management Program provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Project. The Congestion Management Program for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any Congestion Management Program intersection or more than 150 trips to a Congestion Management Program mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a Congestion Management Program roadway intersection or more than 150 trips to a Congestion Management Program freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Less Than Significant Impact. The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. The Project would have a maximum height of approximately 572 feet. As such, the Project would be required to comply with applicable Federal Aviation Administration requirements regarding rooftop lighting for high-rise structures. In addition, the Project would be required to comply with the notice requirements imposed by the Federal Aviation Administration for all new buildings taller than 200 feet, and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). With compliance with these regulations, and given the distance between the Project Site and the nearest airport, impacts to air traffic patterns would be less than significant. Therefore, no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

Potentially Significant Impact. As previously discussed, the area surrounding the Project Site primarily includes residential and commercial uses. The Project proposes the development of residential, office, hotel, and commercial uses. Therefore, the Project would not introduce incompatible uses to the Project Site or surrounding area. Notwithstanding, given the existing design of the roads surrounding the Project Site, particularly the curvature around the Project Site from Sunset Boulevard to Beaudry Avenue, Alpine Street, and White Knoll Drive, the Project could require the implementation of specific design features to ensure adequate sight distances from proposed driveways. Therefore, further evaluation of this topic in the EIR is required.

e) Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily occur within the Project Site, construction activities could potentially require the partial

closure of travel lanes on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. Therefore, further analysis of this issue in the EIR is required.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The Project Site is served by a variety of transit options including numerous bus routes. The development of the Project would also increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVII. TRIBAL CULTURAL RESOURCES.

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:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| 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"/> |

Would the project:

a) 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) 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). Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, Assembly Bill 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in Assembly Bill 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 64 feet below grade. Therefore, 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 Assembly Bill 52, the City notified all applicable tribes on April 20 2018, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant in Playa del Rey. Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge.⁵⁰ Treated water from the Hyperion Water Reclamation Plant is discharged through an outfall pipe five miles into the Santa Monica Bay and

⁵⁰ LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!, accessed January 30, 2018.

Pacific Ocean.⁵¹ The discharge from the Hyperion Water Reclamation Plant into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.⁵² Accordingly, the Hyperion Water Reclamation Plant's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.⁵³

The wastewater generated by the Project would be typical of residential, office, and commercial uses. No industrial discharge into the wastewater system would occur as part of the Project as no such uses are proposed. As the Hyperion Water Reclamation Plant is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As determined in Checklist Question XVIII.a, above, the Project would not cause the wastewater treatment requirements of the Hyperion Water Reclamation Plant to be exceeded. Therefore, the Project would not cause there to be the need for the construction of new water or wastewater treatment facilities or the expansion of such facilities. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. As discussed in Response to Checklist Question IX.c, above, the Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site and affect the amount of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

⁵¹ California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

⁵² California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

⁵³ LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsmid2kqwx_131&_afLoop=21105064772207683#!, accessed January 30, 2018.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact. LADWP supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further analysis of this issue in the EIR will be provided.

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

Potentially Significant Impact. The Project would result in increased wastewater generation. As such, the Project would result in increased use of wastewater infrastructure and facilities. Therefore, further analysis of this topic in the EIR will be provided.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. 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 inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁵⁴ Ten Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.⁵⁵ In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2016, the City of Los Angeles disposed of approximately 2.71 million tons of solid waste at the County's Class III landfills and approximately 44,942 tons at transformation facilities.^{56,57} The 2.71

⁵⁴ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁵⁵ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁵⁶ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

⁵⁷ County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2016 to December 2016).

million tons of solid waste accounts for approximately 3.17 percent of the total remaining capacity (85.45 million tons) for the County's Class III landfills open to the City as of December 31, 2016.^{58,59}

The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity and an average daily in-County disposal rate of 897 tons per day.⁶⁰

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan 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.⁶¹ Based on the most recent 2016 Countywide Integrated Waste Management Plan Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 103.18 million tons.

Based on the 2016 Countywide Integrated Waste Management Plan Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. The 2016 Countywide Integrated Waste Management Plan 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 scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The 2016 Countywide Integrated Waste Management Plan 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; study, 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.⁶² The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁶³ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

⁵⁸ $(2.71 \text{ million tons} \div 85.45 \text{ million tons}) \times 100 = 3.17 \text{ percent}$.

⁵⁹ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

⁶⁰ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

⁶¹ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

⁶² City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed November 2, 2017.

⁶³ 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#!, accessed November 2, 2017.

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

Construction

The Project Site is currently developed with four vacant structures that together comprise approximately 114,600 square feet, the Elysian apartment building, and associated paved surface parking areas. Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous 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 B-1 on page B-67, after accounting for mandatory recycling, the Project would result in approximately 2,752 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 56.34 million tons, as well as the remaining 85.45 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.

As discussed in the Project Description of this Initial Study, the Project would allow for an exchange of uses if certain uses are reduced or eliminated. In particular, the number of residential units could be up to 827 units if the proposed hotel is not constructed, and could include eliminating the proposed commercial and office uses. Additionally, the Project could include an all-residential development with no hotel, office, or commercial uses. Of the potential development options that could occur within the floor area limits of the Project Site, an all residential development would generate the highest construction and demolition waste with approximately 2,765 tons of construction and demolition waste generated. This development option would result in an increase of 13 tons of construction and demolition waste compared to the proposed development and would still be within the capacity of the Azusa Land Reclamation facility and Class III landfills open to the City.

Operation

As shown in Table B-2 on page B-68, upon full buildout, the Project would generate approximately 2,844 tons of solid waste 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 upcoming 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 2025.⁶⁴ The estimated annual net increase in solid waste that would be

⁶⁴ 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/s-lsh-wwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOKGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041 (Footnote continued on next page)

**Table B-1
Project Demolition and Construction Waste Generation**

Building	Size	Generation Rate (lbs/sf) ^{a,b}	Total (tons) ^b
Construction Waste			
Residential (778 units)	776,982 sf	4.38	1,702
Hotel (98 rooms)	75,000 sf	3.89	146
Office	48,000 sf	3.89	93
Commercial (retail/restaurant)	95,000 sf	3.89	185
Demolition Waste			
Vacant Structures to be Removed	114,600 sf	155	8,882
Total for Construction and Demolition Waste			11,007
Total After 75-Percent Recycling			2,752
<hr/> <i>du = dwelling unit</i> <i>lb = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>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.</i> ^b Used conversion of 1 pound = 0.0005 tons. Numbers have been rounded. Source: Eyestone Environmental, 2017.			

generated by the Project represents approximately 0.1 percent of the City's annual solid waste disposal⁶⁵ and approximately 0.003 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.⁶⁶

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 mitigation measures are required. No further evaluation of this topic in the EIR is required.

As discussed above, the Project would allow for an exchange of uses if certain uses are reduced or eliminated. Based on the floor area limits of the Project Site and the proposed uses, the development options could generate between approximately 1,844 tons of solid waste per year for an

NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4, accessed November 2, 2017.

⁶⁵ (2,844 tons per year/2.71 million tons per year) x 100 = ~0.1%

⁶⁶ (2,844 tons per year/85.45 million tons per year) x 100 = ~0.003%

**Table B-2
Estimated Project Solid Waste Generation**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Vacant Former Church Buildings	114,600 sf	N/A ^c	N/A ^c	N/A ^c	0 ^c
Total Existing					0
Proposed					
Residential	778 du	N/A	N/A	2.23/du/yr	1,735
Hotel	75,000 sf	0.00113	85	3.03 tons/emp/yr	257
Office	48,000 sf	0.00479	230	0.37 tons/emp/yr	85
Commercial (Retail/Restaurant)	95,000 sf	0.00271	257	2.98 tons/emp/yr	767
Total with Implementation of Project					2,844
Total Net Increase					2,844
<p><i>du = dwelling unit</i> <i>emp = employee</i> <i>lb = pound</i> <i>sf = square feet</i></p> <p>^a <i>Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2017, Table 14.</i></p> <p>^b <i>Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.</i></p> <p>^c <i>The analysis does not reflect the solid waste generated by the former church use since the buildings are currently vacant.</i></p> <p><i>Source: Eyestone Environmental, 2018.</i></p>					

all residential development to 2,535 tons of solid waste per year for a development consisting of up to 827 units, 48,000 square feet of office, and 75,000 square feet of commercial space (no hotel use). As provided above, the Project would generate 2,844 tons of solid waste per year, which would be higher than the other development scenarios. Therefore, the landfills that serve the Project Site would also have sufficient capacity to accommodate the solid waste that would be generated by other potential development options.

g) Comply with federal, state, and local 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 (Assembly Bill 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. Assembly Bill 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. In addition, Assembly Bill 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. Furthermore, Assembly Bill 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 Assembly Bill 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, 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 Assembly Bill 1826, requiring businesses to recycle their organic waste⁶⁷ 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. In addition, beginning 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 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 on-site recycling area or room of specified size.⁶⁸ The Project would also comply with Assembly Bill 939, Assembly Bill 341, Assembly Bill 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

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

⁶⁷ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

⁶⁸ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

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 prehistory. Therefore, further evaluation of this topic in the EIR is required.

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

Potentially Significant Impact. Located within the vicinity of the Project Site are other past, current, and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may have cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation and traffic; tribal cultural resources; and utilities and service systems (water, wastewater, and energy).

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 utilities and service systems, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Also, the demand for landfill capacity is continually evaluated by the County through preparation of the Countywide Integrated Waste Management Plan annual reports. Each annual Countywide Integrated Waste Management Plan report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2016 Countywide Integrated Waste Management Plan Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2031). The preparation of each annual Countywide Integrated Waste Management Plan provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is 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 solid waste would be less than significant. No further evaluation of these topics in the EIR is required.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services (fire protection, police protection, schools, parks, and other public services); recreation; transportation and traffic; tribal cultural resources; and utilities (water, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.