VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, the significant unavoidable impacts of the Project would include Project-level and cumulative noise and vibration impacts. These impacts are summarized below.

a. Noise

(1) Project-level Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, the estimated noise levels during all stages of Project construction combined would exceed the significance criteria at all representative off-site receptor locations. The estimated construction-related noise would exceed the significance threshold by a range of 3.6 dBA at receptor location R4 to up to 23.4 dBA at receptor location R6, without implementation of mitigation. In addition, the concrete mat foundation pour occurring during the nighttime hours, if permitted by the Executive Director of the Board of Police Commissioners, would exceed the nighttime ambient noise levels by 5 dBA or more at all off-site noise sensitive receptors.

Implementation of Mitigation Measure NOI-MM-1 (e.g., temporary sound barrier) would reduce the Project's on-site construction-related noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a minimum 9 dBA at the residential use adjacent to the Project Site to the north (receptor location R1) and to the south (receptor location R2). However, the temporary noise barrier would only be effective at the ground level of receptor location R1 and R2 because the barriers blocks

line of sight to these receptors, and thereby attenuates noise levels at grade level. The line of sight from the upper floors at these receptors to the Project Site would remain unobstructed because it is not feasible to construct temporary noise barriers that would extend to the height of the buildings at these receptor locations. Thus, the construction-related noise levels at receptor locations R1 and R2 would still exceed the significance thresholds. In addition, due to the site elevation changes (a difference of approximately 70 feet from the southeast corner to the northwest corner), it would not be feasible to provide a temporary noise barrier that shields line of sight from construction activities on the higher northwest portions of the Project Site to the lower area of the off-site receptor locations R3 and R4. Likewise, due to elevation of the Project Site and adjacency of receptor location R6, line of sight noise barriers would be infeasible. It is noted that the noise impact at receptor location R3 would only occur if Related Project No. 1 is completed and occupied prior to or during Project construction. In addition, receptor location R5 is located approximately 50 feet above the Project Site and is already shielded by the California Plaza structure. Therefore, there are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction activities, and noise from on-site construction activities would remain significant and unavoidable.

(2) Cumulative Impacts

There would be potential temporary significant cumulative noise impacts associated with on-site construction activities at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project No. 1 and Related Project No. 5 in the event of concurrent construction activities. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures (e.g., providing temporary noise barriers) for each individual related project. However, even with these mitigation measures cumulative noise impacts associated with on-site construction activities would be significant and unavoidable. Cumulative construction noise impacts associated with off-site construction trucks would also occur. Mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. Therefore, cumulative noise impacts from on-site and off-site construction activities would be significant and unavoidable.

Operation of the Project would not result in significant Project-level traffic noise impacts. However, operation of the Project together with the related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from “Existing” conditions to “Future Plus Project” conditions to the applicable significance criteria. Future Plus Project conditions include traffic volumes

from future ambient growth, the related projects, and the Project. The calculated traffic noise levels under "Existing" and "Future Plus Project" conditions are presented in Table IV.G 23 in Section IV, Noise, of this Draft EIR. As shown therein, cumulative traffic volumes would result in an increase ranging from 1.2 dBA (CNEL) along the roadway segment of Hill Street (between 2nd Street and 3rd Street) to up to 3.3 dBA (CNEL) along the roadway segment of 2nd Street (between Grand Avenue and Olive Street). The estimate cumulative noise increase along 2nd Street would be below the 5 dBA significance criteria applicable to noise levels less than 70 dBA CNEL. However, the estimated cumulative noise increase along 4th Street (between Olive Street and Hill Street) would exceed the 3-dBA significance criteria applicable to noise levels of 70 dBA CNEL and higher for residential uses. Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the impacted roadway segment. There are no other feasible mitigation measures to reduce the significant noise impacts associated with the cumulative off-site traffic. As such, cumulative operational traffic noise associated with the Project, future growth, and the related projects together would be significant and unavoidable along 4th Street (between Grand Avenue and Olive Street).

b. Vibration

(1) Project-Level Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, the estimated vibration levels from on-site construction equipment would exceed the human annoyance significance criteria of 72 VdB at the off-site residential uses south of the Project Site (receptor location R2) during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 80 feet of receptor location R2). Receptor location R2 is across 4th Street from the Project Site and thus is susceptible to certain vibration in the existing condition from passing heavy trucks. The vibration impact from the Project would be primarily limited to receptors at grade and on the lower-level floors of the building because vibration attenuates rather quickly with distance from the ground level to upper floors. Accordingly, there would be limited vibration effects from construction of the Project on most of the areas within receptor location R2. Notwithstanding, mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective, are cost prohibitive for temporary applications such as construction, and therefore are considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation

equipment. As such, the Project's vibration human annoyance impact from on-site construction activities would be significant and unavoidable.

With regard to off-site vibration associated with the Project during construction, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential and hotel uses. Buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. The residential uses along Alameda Street (between 4th Street and 27th Street) are located a minimum of 50 feet from the anticipated truck route(s) and would be exposed to ground-borne vibration levels of approximately 63 VdB, which would be below the 72-VdB significance criteria. There are also residential and hotel along 3rd Street and 4th Street (between Hill Street and I-110 Freeway on-ramp) that are located a minimum of 30 feet from the anticipated truck route(s), but the temporary vibration levels from trucks passing by these uses would be approximately 70 VdB which would be below the 72-VdB significance criteria. However, the residential uses along 4th Street and 7th Street (between Hill Street and Alameda Street) are located approximately 20 feet from the anticipated truck route(s). These uses would be exposed to ground-borne vibration of 75 VdB which would exceed the 72-VdB significance criteria. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from Project construction trucks traveling along the anticipated truck route(s) would be significant. Mitigation measures considered to reduce vibration impacts from off-site construction activities with respect to human annoyance included the installation of a wave barrier. As discussed above, wave barriers must be very deep and long to be effective, are cost prohibitive for temporary applications such as construction, and therefore are considered infeasible. In addition, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. Therefore, the Project's vibration human annoyance impact from off-site construction activities would be significant and unavoidable.

(2) Cumulative Impacts

Vibration levels from off-site construction trucks associated with the Project and the related projects would exceed the significance criteria for human annoyance at vibration sensitive receptors along the anticipated construction routes. There are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Hence, to the extent that other related projects use the same truck route(s) as the Project, cumulative construction-related off-site vibration (human annoyance) impacts associated with off-site construction trucks would be significant and unavoidable.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the Project's basic objectives, both identified in Section II, Project Description, of this Draft EIR. The underlying purpose of the Project is to redevelop the site by providing a high-density, mixed-use, transit- and pedestrian-oriented development that includes a mix of housing types (including affordable units) integrated with hotel, retail, restaurant and open space uses to transform the vacant site into a marque destination and functional linkage between the Historic Core and Bunker Hill areas of downtown. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

- Maximize density and floor area ratio on the site with a high level of intensity to create a high-energy urban experience with an interrelated mix of land uses that function to transform the site into an iconic development.

- Provide attractive and ample publicly accessible open spaces that incorporate community amenities and integrate the Angels Flight funicular into the experience of the site.

- Establish and maintain active and accessible linkages between the residential, office, and cultural amenities on Bunker Hill and in the Historic Core area to enhance the interconnectivity of these communities.

- Integrate the existing Metro portal as a component of open space and plaza design to enhance the pedestrian and transit user experience at the site.

- Create a mix of interactive land uses with expanded for-sale and for-rent housing opportunities blended together with commercial uses to enhance the 24-hour downtown experience and provide an infill development that enlivens adjacent streets and integrated public spaces.

- Develop a high-quality mixed-use project that provides residential dwelling units that contribute to the City's housing supply, while integrating hotel uses capable of enhancing the experience in Bunker Hill and contributing to the supply of downtown hotel rooms for convention and tourist activities.

- Construct an economically feasible project that expands the economic base of the City and provides employment opportunities and new sources of tax revenue for the City by providing construction and permanent jobs, attracting commercial

tenants and hotel operators, and increasing hotel patrons that collectively increase City tax revenues directly and indirectly.

- Utilize public investment in public transit by redeveloping an urban infill location with on-site mass transit capabilities to further smart growth land use planning practices and align with policies related to the reduction of greenhouse gas emissions and vehicle miles travelled.

The underlying purpose and objectives of the Project are closely tied to the land use, economic and environmental goals, objectives, and policies set forth in applicable plans, including but not limited to: the City of Los Angeles (City) General Plan, Mobility Element 2035, Housing Element, and Health and Wellness Element; Central City Community Plan; Draft Downtown Community Plan[1]; Bunker Hill Specific Plan; Los Angeles Municipal Code (LAMC)—Zoning Code; and the Southern California Association of Government's (SCAG's) Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS). How the Project would support the applicable goals, objectives and policies of these plans is summarized below and discussed in detail in section IV.F, Land Use and Planning, of this Draft EIR.

a. City of Los Angeles General Plan

(1) Framework Element

The Project Site has a Regional Center Commercial land use designation which is characterized by a diversity of uses and is intended to serve as the focal points of regional commerce, identity, and activity. The Framework Element encourages mixed-use developments in Regional Centers, integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces, and amenities, with such centers typically providing a significant number of jobs and functioning as a hub for regional transit. The Project would support the Framework Element's Land Use chapter as it would: (1) be consistent with the Regional Center Commercial land use designation; (2) create a diverse mix of uses that supports the needs of the City's existing and future residents, businesses, and visitors (Objective 3.1); (3) promote an improved quality of life by providing for a spatial distribution of development that promotes a reduction of vehicular trips, vehicle miles traveled (VMT) and air pollution(Objectives 2.2 and 3.2); (4) encourage new multi-family residential and retail uses in a Regional Center along primary transit corridors (Objectives 3.4 and 3.15); (5) accommodate multi-family residential units on a site permitted for such uses (Policy 3.7.1); and (6) accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity (Objective 3.16).

[1] *Analysis of Project consistency with the Draft Downtown Community Plan in this EIR is provided for informational purposes only as this plan has not yet been adopted.*

The Urban Form and Neighborhood Design chapter calls for improving the livability of the City by improving the walkability and safety of neighborhoods. The Project would provide active uses on the ground floor and surrounding the public plazas which would create a walkable environment and pedestrian linkages and paseos that connect the Bunker Hill neighborhood and the Historic Core. The Project would also: (1) encourage development in centers along transit by introducing a high density mixed-use development an on urban infill site in Downtown adjacent to a Metro portal (Objective 5.2); and (2) enhance the livability of the Project Site and neighborhood (Objective 5.5), reinforce the establishment of a strong pedestrian orientation (Objective 5.8), and incorporate proper design and effective use of the built environment to increase personal safety (Objective 5.9) by replacing a largely vacant site with arrival plazas, a central plaza, and open space terraced levels that would generally open to the public during daylight hours.

The Project would further the goals and policies of the Open Space and Conservation Chapter by providing a variety of open space areas within the Project Site which exceed LAMC requirements. The Project would support Policy 4.4.8, which calls for the development of public plazas among other common open space areas, by including multiple common open space areas that would be publicly accessible, including Angels Terrace and areas with seating and shade trees on the Hill Street and California Plaza levels. The Project would also further Policy 6.4.3, which calls for appropriate connections between the City's neighborhoods and elements of the Citywide Greenway Network, and with Policy 6.4.11, which calls for siting open space adjacent to existing public facilities, by providing open space adjacent to Angels Flight, California Plaza, and the metro portal and providing pedestrian connections between these uses and Project's open space network.

The Economic Development chapter is designed to facilitate business retention and job growth. The Project would support Objective 7.2 to establish a balance of land uses that provides for commercial development to meet the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality through the development of a mix of integrated and supporting land uses within one site, including multi-family residential (both market rate and affordable units), hotel, retail, restaurant, and open space uses. The Project would further Policy 7.2.1 as the Project Site would become City-owned land (subsequent to the land sale from CRA/LA to the City) and has been identified as an optimal site for development of commercial and residential uses. The Project would also further Policies 7.2.2, 7.2.3, and 7.9.2 to concentrate residential and commercial development in areas best able to support them, including in community/regional centers, near transit stations, and adjacent to mixed-use corridors, by developing residential, hotel and commercial uses in the Downtown Core adjacent to the Metro portal and multiple bus routes within an area already fully developed with roadway and utility infrastructure. The Project would also further the City's Objective 7.9, which calls for the provision of a range of housing types to accommodate future population growth, by providing condominiums and apartments of various sizes, including affordable units.

Lastly, the Project would have a positive economic impact by creating hundreds of temporary and permanent jobs and generating substantial tax revenues for the City.

(2) Mobility Plan 2035

The Transportation Chapter of the Framework Element recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and VMT, and encouraging new development near transit centers. The Project would exemplify the type of project in that it would be a mixed-use project on an urban infill site adjacent to transit within a City-designated TPA and a SCAG-designed HQTA. The Project would support relevant policies of Mobility Plan 2035. The Project would support Policy 1.6 to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan and work site traffic control plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would also support Policy 2.3 to recognize walking as a component of every trip, ensure high quality pedestrian access, and provide a safe and comfortable walking environment by promoting walkability through the Project's design and pedestrian and streetscape improvements. In addition, the Project would promote Policy 3.1 to recognize all modes of travel by providing adequate and enhanced pedestrian and vehicular access and providing bicycle facilities within a TPA and HQTA in close proximity to transit (including the on-site Metro portal). The Project would also provide a gateway for alternative transportation modes and a designated off-street area for drop-offs and pick-ups on Level 1. The Project would further Policies 3.3 and 3.4 to promote equitable land use decisions that result in fewer vehicle trips by providing development consistent with the existing General Plan land use and zoning designations, with a mix of uses in proximity to jobs (including those that would be offered on-site), destinations, and neighborhood services in an area well-served by transit.

(3) Housing Element

The Housing chapter of the Framework Element states that the City must strive to meet the housing needs of the population in a manner that contributes to a stable, safe, and livable neighborhoods, and improves access to jobs and neighborhood services, particularly by encouraging future housing develop near transit. The Project would further this goal by providing a range of new housing opportunities, including affordable housing, within Downtown proximate to existing jobs and with safe and easy access to transit (including the on-site Metro portal). The Project would also support Housing Element Objective 1.1 to produce an adequate supply of housing as well as Objective 2.2 to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities,

services, and transit through the development of 180 residential for-sale condominium units and 252 residential apartment units, including studio, one-, two-, and three-bedroom units (with affordable housing comprising five percent of the total units), two hotels with food and beverage spaces, retail, restaurant, and open space uses within one site in an area well-served by public transit. The Project would also promote sustainable neighborhoods consistent with Housing Element Objective 2.2, and would promote smart growth and sustainability consistent with Objective 2.3 and Policy 2.2.1, by intensifying density on an urban infill site within a City-designated TPA and SCAG-designated HQTA and within close proximity to transit, therefore reducing VMT and associated fuel consumption. The Project would promote sustainable buildings in order to minimize adverse effects on the environment and minimize use of non-renewable resources (Objective 2.3) by incorporating environmentally sustainable building features and construction protocols required by Title 24, the Los Angeles Green Building Code, and CALGreen, as well as those required to achieve LEED Silver certification.

b. Central City Community Plan

The proposed land uses would be consistent with the Project Site's Regional Center Commercial land use designation and further the land use objectives and policies of the Community Plan. Specifically, the Project would further Objective 1-2 to locate new housing in a manner that reduces vehicular trips it would: (1) provide housing and job opportunities within a single site; and (2) intensify urban density on a vacant urban infill site in the Downtown Core within a TPA and HQTA that is well-served by transit. The Project would also support Objective 1-3 to foster development that can accommodate a full range of incomes by providing condominium and apartment units of various sizes, including affordable units. The Project would further Objective 2-1 to improve the Central City's competitiveness as a location for offices, business, retail, and industry, and Objective 2-3 to promote land uses that address the needs of visitors to Downtown, by providing new hotel and retail uses in Downtown in close proximity to local and regional destinations. The Project would also support Objective 2-4 to encourage a mix of uses with an active 24-hour environment while promoting tourism with provision of the proposed residential, hotel, retail, and restaurant uses, and would support Objective 11-3 to provide an internal circulation system that focuses on connecting activity centers, and Objective 11-6 to accommodate pedestrian open space usage in the Central City, by providing an on-site pedestrian circulation system that connects the proposed uses, including the proposed open space, to Angels Flight, California Plaza and the Metro portal. The Project would also provide pedestrian connections between Bunker Hill and the Historic Core.

c. Los Angeles Municipal Code—Zoning Code

The Project Site is zoned C2-4D (Commercial zone, Height District 4 with Development Limitations). The C2 zoning permits a wide array of land uses, such as retail

stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. The proposed residential, hotel, retail, commercial, restaurant, and open space uses are all permitted in the C2 zone. Furthermore, the Project would be consistent with the 13:1 floor-area ratio (FAR) maximum permitted at the site by the LAMC and by the floor area rights provided in the Bunker Hill Specific Plan.

d. Bunker Hill Specific Plan

The Project would further the primary purposes of the Specific Plan for the following reasons. One, the Project would be consistent with and implement the Community Plan land uses programed for the Project Site. Two, the Project would redevelop a vacant urban infill site with a mixed-use development that provides a range of housing opportunities, two hotels, and commercial, retail, restaurant and open space uses which would include a 24-hour population and enliven the district. Three, the Project would reinforce and enhance the district's identity as the cultural center for the region by including hotels that could serve tourist and visitors to major downtown attractions. Four, the Project would substantially expand the economic base of the City by creating hundreds of temporary and permanent jobs and creating substantial tax revenues for the City. Five, the Project would maintain a high-quality built form that enlivens the streets and public spaces. Six, the Project would support the expansion of the regional transit network because it would include a mix of land uses integrated with an existing Metro portal that would encourage transit use. Seven, the Project would create a transit-friendly environmental because it would integrate numerous pedestrian linkage across the Project Site, incorporate several ground floor active uses, and enhance the pedestrian and rider experience for the existing Metro facilities on and adjacent to the Project Site. Eight, the Project would improve the surrounding business environment by redeveloping the mostly vacant site into a dynamic, landscaped, attractive public realm that links the surrounding business environments together.

e. 2016–2040 RTP/SCS

The Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by increasing density on an urban infill site within a City-designated TPA and SCAG-designated HQTA in close proximity to jobs, shopping, services and transit, and by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site would be served by a variety of nearby mass transit options, including a fixed rail transit station

located within the Project Site. The Project would also provide bicycle parking spaces for the proposed uses that would promote the use of bicycles, adequate vehicle parking to serve the proposed uses, and charging stations to serve electric vehicles. Lastly, the Project would develop sustainable buildings in accordance with the energy conservation requirements of Title 24, the Los Angeles Green Building Code, and CalGreen.

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.[2] As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[3] On October 30, 2020, the California Air Resources Board (CARB) made the determination that the 2020–2045 RTP/SCS would meet the regions greenhouse gas (GHG) reduction target. The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the Project would be consistent with the 2016–2020 RTP/SCS as discussed later in this section, the Project would also be consistent with the 2020–2045 RTP/SCS.[4] Because the 2020–2045 RTP/SCS was adopted by SCAG subsequent to circulation of the Notice of Preparation (NOP) for the Project on March 29, 2019, this Draft EIR evaluates Project consistency with the 2016–2020 RTP/SCS.

f. Conclusion

Based on the above, the Project would substantially further applicable City and SCAG land use, economic and environmental goals, objectives and policies. The Project would also expand the City's economic base by creating hundreds of temporary and permanent jobs and would generate substantial tax revenues for the City. Therefore, the benefits of the Project, including housing, employment, and opportunities for people to live, work, and recreate within one site, would outweigh its significant unavoidable noise and vibration impacts.

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[2] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

[3] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

[4] *For example, the Project would be consistent with both the 2016–2040 RTP/SCS and the 2020–2045 RTP/SCS because it would increase urban density within an High Quality Transit Area (HQTA) immediately adjacent to a Metro light rail station and in close proximity to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.*

3. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not result in the commitment of large quantities of natural resources that would result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Construction of the Project would require building materials, including some building materials that are slowly renewable and nonrenewable resources. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics). However, the Project's consumption of these materials would be miniscule in comparison to the total amount of these materials used in the City of Los Angeles and the greater Southern California area, and would not deprive others of such materials which are readily available and practically unlimited in supply. Furthermore, the use of these materials would not occur in an inefficient or wasteful manner given that Project construction would adhere to the sustainability requirements of Title 24, the Los Angeles Green Building Code, and CALGreen, as well as those required to achieve Leadership in Energy and Environmental Design (LEED) Silver certification (such as specific percentage requirements for the use of recycled building materials).

Project solid waste impacts are discussed in Sections XIX.d and XIX.e, Utilities and Service Systems – Solid Waste, of the Initial Study included as Appendix A.1 of this Draft

EIR. As indicated therein, 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. In addition, the Project would adopt recycling practices and provide for organic waste recycling during operation in accordance with AB 341 and AB 1826, respectively. The Project would also comply with the City's Space Allocation Ordinance requiring development projects to include an on-site recycling area or room and provide clearly marked source-sorting receptacles to facilitate recycling to comply with State diversion requirements (e.g., AB 939, AB 341, and AB 1826). Furthermore, as discussed in the previous paragraph, the Project would utilize recycled building materials to the extent required by existing regulations and as required to achieve LEED Silver certification. Thus, the Project would not result in the inefficient or wasteful use of building materials during either Project construction or operation, and as indicated in the Initial Study, would result in less than significant solid waste impacts.

b. Water

Consumption of water during Project construction and operation is addressed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of water use during Project construction ranges from 1,000 to 2,000 gallons per day (gpd). This water use would vary depending on soil conditions, weather, and the specific activities being performed. Nevertheless, Project construction-related water use would be minimal and temporary. Furthermore, the Water Supply Assessment (WSA) prepared by the Los Angeles Department of Water and Power (LADWP) for the Project concludes that projected LADWP water supplies during normal, single-dry, and multiple-dry years, as reported in LADWP's 2015 Urban Water Management Plan (UWMP), would be sufficient to meet the Project's estimated operational water demand in addition to the existing and forecasted water demands within LADWP's service area through the year 2040. Because the Project's construction-related water demand would represent only a small fraction (approximately 0.4 to 0.5 percent) of the Project's estimated operational water demand of 469,501 gpd (373,957 gpd after implementation of Code-required and proposed water conservation measures), LADWP water supplies would be more than adequate to meet Project construction-related water demand during normal, single-dry, and multiple dry years.

During operation, the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Assuming constant water use throughout the year, the WSA estimates that Project operation would result in a net increase in average daily water demand of 469,501 gpd

(525.94 AFY), or 373,957 gpd (418.91 AFY) after implementation of Code-required water conservation measures and the additional water conservation measures outlined in Project Design Feature WAT-PDF 1 included in Section IV.L.1 of this Draft EIR. As stated in the WSA, LADWP has concluded that projected LADWP water supplies during normal, single-dry, and multiple-dry years would be sufficient to meet the Project's estimated pre- and post-water conservation water demand in addition to the existing and projected future water demands within LADWP's service area through the year 2040. Furthermore, the WSA states that the Project would be consistent with SCAG RTP/SCS growth projections, and that the Project's water demand would be within the LADWP 2015 UWMP's 25-year water demand projections. Lastly, Project operational water use would occur in accordance with all applicable water conservation requirements, including City of Los Angeles Ordinance No. 184248, the 2017 Los Angeles Plumbing Code, and the 2017 Los Angeles Green Building Code, and with the additional water conservation measures outlined in Project Design Feature WAT-PDF 1.

Thus, as evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not utilize water in an inefficient or wasteful manner or result in significant impacts related to water supply.

c. Energy Consumption

As discussed in Section IV.C, Energy, of this Draft EIR, the Project would not result in potentially significant environmental impacts due to the wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction, the Project would comply with on-road fuel economy Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements of California Title 24, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code, and would include the additional energy conservation measures required to LEED Silver certification or equivalent green building standards.

With regard to transportation related energy usage, as indicated in Section IV.C, Energy, of this Draft EIR, the Project would comply with the goals of SCAG's 2016 RTP/SCS that incorporates VMT targets established by SB 375. The Project's infill nature, mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region.

Implementation of TDM strategies (e.g., bicycle infrastructure) as set forth in Section IV.J, Transportation, and Project Design Features GHG-PDF-2 as outlined in Section IV.C, Energy, (e.g., minimum of 20 percent of total code-required parking spaces shall be capable of supporting future EVSE and 5 percent equipped with EV charging stations) would also serve to reduce transportation fuel consumption. In addition, vehicle trips generated during Project operation would comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. During construction activities, the Project would be required to comply with California Air Resources Board (CARB) anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

The Project would comply with existing energy efficiency standards and with additional energy conservation measures (such as those required for LEED silver certification). In all, implementation of project design features and energy efficiency measures would reduce Project operational electricity usage by 10 percent, natural gas usage by 5 percent, and transportation fuel usage by 52 percent, when compared to a project without energy efficiency measures.

Based on the above, the Project would not cause the wasteful, inefficient, or unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, as concluded in Section IV.C, Energy, of this Draft EIR, Project operations would not conflict with adopted energy conservation plans, and Project energy impacts would be less than significant.

d. Environmental Hazards

The Project's potential use of hazardous materials is evaluated in Section IX, Hazards and Hazardous Materials, of the Initial Study included as Appendix A.1 of this Draft EIR. As discussed therein, while the Project would use small amounts of hazardous materials (fuels, adhesives, paints, fuel, etc.) typical of large mixed-use residential/ commercial developments, the Project would not be of a type (e.g., industrial or manufacturing use, refinery, landfill, etc.) that would use, store, generate or dispose of large quantities of hazardous or acutely hazardous materials or waste. In addition, all potentially hazardous materials would be used and stored in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. The Project would also be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

e. Extension of Roads and Other Infrastructure

The Project would be developed on an underutilized and largely vacant urban infill parcel within a fully urbanized area that is surrounded on all sides by urban development. Also, as indicated in Section IV.F, Land Use and Planning, of this Draft EIR, the Project Site is already designated and zoned for high-density urban development, and the Project would be consistent with this designation and zoning. Furthermore, the Project would be located within an area that is already served by fully developed roadway and utility infrastructure systems, and as indicated in Sections IV.J, Transportation, and IV.L, Utilities and Service Systems, of this Draft EIR the extension of roads and utility infrastructure would not be required to serve the Project. Therefore, the Project would not open new areas to development or commit future generations to unplanned development.

f. Conclusion

Based on the above, Project construction and operation would require the commitment of limited, slowly renewable and non-renewable resources. However, this commitment of resources would not be substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in an inefficient or wasteful manner. Project construction and operation would adhere to the sustainability requirements of Title 24, the Los Angeles Green Building Code, and CALGreen, as well as those required to achieve LEED Silver certification. Therefore, the Project would not result in the commitment of large quantities of natural resources that would result in significant irreversible environmental changes. Furthermore, as demonstrated by the analysis in Subsection 2 above, the Project would result in substantial public benefits; hence, the limited use of nonrenewable or slowly renewable resources by the Project would be justified.

4. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could

significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced by: (1) direct growth associated with a project; and (2) indirect growth created by demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

The Project Site is an urban infill site within an urban area, and the Project would not extend roads or utility infrastructure to an area not already served by such roads and utility infrastructure. Also, as indicated in Section IV.L, Utilities and Service Systems, of this Draft EIR, the existing utility (water, wastewater and energy) infrastructure is adequate to serve the Project, and the Project would not require and does not propose new or expanded roadways, water treatment, wastewater treatment, energy generation infrastructure, or associated conveyance infrastructure (e.g., the proposed utility improvements would be restricted to those required to connect the Project to the existing Utility infrastructure in/along the adjacent streets). Lastly, because the Project would represent infill development within a highly urbanized area, it would avoid urban sprawl. Therefore, the Project would not remove obstacles to growth or include new or expanded roadway and utility infrastructure that could induce growth. Furthermore, as indicated in Section IV.I, Public Services, of this Draft EIR, the Project would not require new public services facilities (e.g., fire stations, police stations, or schools).

As discussed in Section II, Project Description, of this Draft EIR, the Project is a mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. As discussed in Section IV.H, Population and Housing, of this Draft EIR, these uses would generate an estimated 1,046 residents and 535[5] permanent employees, with Project construction generating up to an estimated 425[6] temporary construction jobs during the most intense phase of Project construction. Hence, the Project would result in some direct (associated with the proposed housing) and indirect (associated with the proposed employees/jobs) population growth, along with direct and indirect economic growth.

Regarding the Project's direct population growth, this growth would not induce the need to construct additional housing as housing for the Project's resident population would

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[5] *From the City of Los Angeles VMT Calculator run for the Project (see Section IV.J, Transportation, of this Draft EIR for further discussion, and Appendix J.1, Transportation Assessment, of this Draft EIR for VMT Calculator run output).*

[6] *From Appendix B, Technical Appendix for Air Quality and Greenhouse Gas Emissions, Sub-Appendix B-2.3, Summary of Construction Assumptions, of this Draft EIR.*

be developed as part of the Project. Furthermore, the housing associated with the Project would represent a public benefit, both because of the jobs-rich and housing-poor nature of Downtown Los Angeles and because of the affordable housing to be included as part of the Project. As discussed in Section IV.H, Population and Housing, of this Draft EIR, the Project's residential population would be consistent with City and SCAG RTP/SCS growth projections. Lastly, the Project would be developed on an urban infill site adjacent to and within close proximity of transit, would be consistent with the General Plan land use designation and zoning of the Project Site, would be consistent with development and environmental regulations applicable to the site (such as open space, TDM, VMT reduction, and water conservation requirements) and would be consistent with and has been planned for in applicable City land use, housing, economic development, and transportation plans as discussed previously.

Regarding the Project's indirect population growth, the construction and permanent jobs that would be created by the Project could potentially crate a demand for additional housing in the area. However, such demand would not be substantial. Specifically, construction workers would not be anticipated to relocate to the area as a result of employment opportunities associated with the Project as: (1) there is no regular place of work – construction workers commute to job sites that change many times in the course of a year; and (2) many construction workers (e.g., crane operators, steel workers, masons, etc.) are highly specialized, and move from job site to jobs site as dictated by the demand for their skills. In addition, given its Downtown location and the types of jobs to be created (e.g., primarily service jobs), it is anticipated that the majority of the permanent jobs to be created would be filled by persons already residing in the vicinity who would not relocate their households due for such employment opportunities, and by persons who would commute to the Project Site from other communities in and outside of the City. Furthermore, as most of Downtown and the adjacent areas are already built-out, it is likely that the goods and services that would be required by any employee that relocates to the area as a result of the Project would be provided by existing businesses and public service facilities. Lastly, the employment generation associated with the Project would represent a public benefit.

Regarding the Project's economic growth, the Project would result in direct economic growth within the Downtown area and greater City of Los Angeles through development of the proposed hotel and commercial uses, and could indirectly foster economic growth through the additional demand for services associated with Project residents. However, this economic growth would be beneficial, and would be consistent with both applicable City land use plans (such as the Land Use Chapter of the General Plan, Central City Community Plan, Bunker Hill Specific Plan, the LAMC) and applicable economic plans (such as the Economic Chapter of the General Plan), as discussed previously. Furthermore, while this economic growth could indirectly foster additional physical growth in the City, this growth would be consistent with existing City plans for such

growth, would occur mainly or completely within the existing urban areas of the City, and would be subject to CEQA review and requirements to mitigate any associated significant environmental impacts.

Overall, the Project would be consistent with the growth forecast for the SCAG Region and the City, and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle trips and VMT and with proximity to public transit options. Therefore, growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project were reviewed. The following provides a discussion of the potential secondary impacts that could be associated with implementation of the proposed mitigation measures, listed by environmental issue.

a. Air Quality

Mitigation Measures AIR-MM-1 through AIR-MM-6 are included in Section IV.A, Air Quality, of this Draft EIR, to reduce the Project's construction-related air quality impacts. Specifically, Mitigation Measure AIR-MM-1 would require off-road diesel-powered equipment greater than 50 horsepower used during the grading/excavation and utility trenching phases to meet USEPA Tier 4 final emissions standards. Mitigation Measure AIR-M-2 requires haul trucks used during the grading/excavation phases be model 2007 or newer. Mitigation Measure Air-MM-3 requires construction equipment to be properly tuned and maintained in accordance with manufacturer specifications. Mitigation Measure AIR-MM-4 requires contractors to maintain and operate construction equipment so as to minimize exhaust emissions, with truck engines turned off after five minutes while waiting in loading/unloading ques. Mitigation Measure AIR-MM-5 requires the use of electric- rather than petroleum-powered generators during construction to the extent feasible, with the use of petroleum generators located at least 100 feet from sensitive land uses Mitigation Measure AIR-MM-6 requires the Project to include the use of solar-powered generators during construction where feasible. These mitigation measures would not include the construction of physical improvements or other actions that would result in additional physical impacts on the environment. Implementation of Mitigation Measures AIR-MM-1

through AIR-MM-6 would be beneficial in reducing construction emissions for all pollutants and would not result in adverse secondary impacts.

b. Geology and Soils (Paleontological Resources)

Mitigation Measures GEO-MM-1 through GEO-MM-3 are included in Section IV.E, Geology and Soils (Paleontological Resources), of this Draft EIR, to reduce Project impacts on paleontological resources. Specifically, Mitigation Measure GEO-MM-1 requires that a qualified paleontologist be retained prior to the approval of demolition or grading permits to provide technical and compliance oversight of all work as it relates to paleontological resources and report to the Project Site in the event potential paleontological resources are encountered. Mitigation measure GEO-MM-2 requires paleontological resources monitoring by a qualified paleontological monitor of all ground disturbing activities that exceed 15 feet in depth in previously undisturbed older Alluvial, and requires the monitor to recommend whether the depth of required monitoring should be revised based on his/her observations, halt or divert work away from exposed fossils or potential fossils, and prepare daily logs detailing the types of activities and soils observed, and any discoveries. Mitigation Measure GEO-MM-3 requires that any significant fossils collected during project-related excavations be prepared to the point of identification and curated into an accredited repository with retrievable storage, and that the paleontologist prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries, with the report submitted to the appropriate repository and the City. This mitigation measure could potentially require excavations to completely unearth any paleontological finds if such is the recommendation of the paleontologist. However, any such additional excavations would be expected to occur within the Project's excavation area, with any associated environmental effects (e.g., ground disturbance, noise, etc.) subsumed in the construction impact analysis for the Project in Section IV of this Draft EIR. Implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in adverse secondary impacts.

c. Noise

Mitigation Measure NOI-MM-1 is included in Section IV.G, Noise, of this Draft EIR, to reduce the noise impacts related to on-site Project construction activities. This mitigation measure requires the erection of a temporary and impermeable sound barrier at the locations listed below during construction, with documentation prepared by a noise consultant verifying compliance with this measure:

- Along the northwestern property line of the Project Site between the construction areas and the residential use at 300 Olive Street (receptor location R1). The

temporary sound barrier shall be designed to provide a minimum 9-dBA noise reduction at the ground level of the residential use (receptor location R1).

- Along the southern property line of the Project Site between the construction areas and residential use at 417 4th Street (receptor location R2). The temporary sound barrier shall be designed to provide a minimum 9-dBA noise reduction at the ground level of receptor location R2.

The sound barrier would be temporary, with its purpose to reduce the noise impacts associated with the Project's on-site construction activities. Once construction is completed, the barriers would be removed. Furthermore, any impacts associated with the erection of the noise barrier (e.g., ground disturbance, noise, etc.) would occur on the Project Site, with these impacts subsumed in the construction impact analysis for the Project in Section IV of this Draft EIR. Therefore, implementation of Mitigation Measure NOI-MM-1 would be beneficial in reducing the Project's on-site construction noise impacts and would not result in adverse secondary impacts. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

6. Effects Not Found to be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A.1 of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined, through the Initial Study, that the Project would not have the potential to cause significant impacts related to the following: aesthetics, agriculture and forestry resources, air quality (odors), geology and soils (except for paleontological resources), hazards and hazardous materials, hydrology and water quality, land use and planning (division of an established community, conflicts with an HCP or NCCP), mineral resources, public services (parks, libraries), recreation, utilities and service systems (telecommunications), and wildfires. A summary of the analysis of these issues in the Initial Study is provided below.

a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project aesthetics and parking impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." The proposed Project would represent a mixed-use residential employment center project on an infill site

within a TPA (see Checklist Section I in the Initial Study for discussion). As such, the aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, an analysis of potential aesthetic impacts of the Project has been provided for informational purposes only.

Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. The Project Site is currently vacant and unmaintained land and public access is not allowed. There are no resulting views from the Project Site. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since there are no publicly available views from the Project Site and no vistas currently exist. Therefore, no impacts to scenic vistas would occur.

The Project Site is not located along a City-designated or State scenic highway. Therefore, the Project would not substantially damage scenic resources within a State or City-designated scenic highway. Therefore, no impacts to scenic resources would occur.

The Project Site has a Regional Center Commercial General Plan land use designation and is zoned C2 4D (Commercial zone that does not limit height). The Bunker Hill Specific Plan, in conjunction with the Project Site's C2-4D zoning, permits a mix of residential, educational, and commercial uses on the Project Site. As such, the proposed residential, hotel, and commercial uses would be consistent with the types of uses anticipated for the Project Site's C2-4D zone. In addition, the proposed height and scale of the towers would be consistent with the height and visual qualities of surrounding buildings. Furthermore, the Bunker Hill Specific Plan contains urban design regulations that work in concert with the provisions of the Downtown Design Guide, which both apply to the Project Site, and the Project would adhere to these regulations. Thus, there would be consistency with zoning and other regulations governing scenic quality. In addition, the Project would undergo City design review and incorporate elements that are consistent with the applicable requirements of the Bunker Hill Specific Plan and Downtown Design Guidelines. Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality, and no impacts to scenic quality would occur.

The Project would shade some existing adjacent shadow-sensitive for more than the applicable significance thresholds for shading. Notwithstanding, in accordance with Senate Bill 743, PRC Section 21099, and Zoning Information File ZI No. 2452, the Project's shading impacts would not be considered significant.

The Project Site is currently vacant with minimal sources of light or glare. However, the Project Site is in a highly urbanized section of downtown Los Angeles and is surrounded by urban infrastructure, street lighting, and mid- and high-rise buildings with sources of daytime and nighttime light and glare. Accordingly, the existing ambient

conditions contain numerous sources of light and glare typical of a dense urban downtown environment. The views in the area are composed of the urban infrastructure, high-rise buildings in Bunker Hill, and the mid- and lower-rise buildings in the Historic Core area. Furthermore, Project lighting and exterior building facades would be in accordance with all applicable City light and glare requirements (such as directing light downward, shielding light sources, utilizing low-glare generating building facade materials, erecting construction fencing around the construction site during the construction period to screen the construction site from view, etc.), and these requirements have been formulated to avoid significant light and glare impacts. Therefore, while the Project would introduce new sources of light and glare at the Project Site during Project construction and operation, the Project would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

b. Agricultural and Forestry Resources

The Project Site is located within an urbanized area, is surrounded on all sides by urban development, does not contain farmland or forest land, is zoned by the LAMC for urban use (e.g., C2-4D), and is not subject to a Williamson Act contract. Therefore, the Project would result in no impact to agricultural and forestry resources.

c. Air Quality (Odors)

Construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that would be generated during construction would be localized and temporary in nature and would not be sufficient to adversely affect a substantial number of people. In addition, 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. Furthermore, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Project construction and operation would also comply with: (1) SCAQMD Rules 401 and 403 regarding visible emissions violations; and (2) 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. Therefore, the Project would not create odors that would adversely affect a substantial number of people, and the impact would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. Landscaping within the Project Site includes unmaintained ornamental shrubs and trees dispersed throughout the Project Site. Due to the disturbed nature of the Project Site and the surrounding urban areas, and lack of open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Specifically, according to the Biological Resource Assessment Memorandum, a habitat assessment for special-status plants found no areas capable of supporting special-status plants. In addition, according to the Biological Resource Assessment Memorandum, 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. 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.

No riparian or other sensitive natural community exists on the Project Site or vicinity. The Project Site is also 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. In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the US Fish and Wildlife Service. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur.

The Project Site is located in an urbanized area and 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. As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur.

The Project Site is located in an urbanized area and is surrounded on all sides by urban development. In addition, 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. As concluded in the Biological Resource Assessment Memorandum, the area exhibits no potential as a wildlife corridor. Furthermore, while the Project Site contains vegetation that has the potential to support nesting birds and bats, the Project would comply with the Migratory Bird Treaty Act, California Fish & Game Code Section 3503 regarding take (such as the take of nests or eggs of bird species except as

otherwise provided by this code), and other applicable regulations, with Project Design Features BIO-PDF-1 and BIO-PDF-2 proposed to ensure compliance. With adherence to existing regulations and further direction provided in BIO-PDF-1 and BIO-PDF-2, the Project would not interfere substantially with the movement of 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 sides. Impacts would be less than significant.

The Project would be subject to the City's Protected Tree Ordinance. This 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..." According to the Tree Report included in Appendix IS-2 of the Initial Study which is included as Appendix A.1 of this Draft EIR, there are 131 trees located within the Project Site and eight trees located adjacent to the Project Site, within the City right-of-way, that would be removed as part of the Project. However, none of these trees are protected trees. Also, the Project would replace the non-protected trees to be removed at a minimum 1:1 basis and would adhere to applicable City tree removal requirements (such as obtaining the required Tree Removal Permit from the Board of Public Works). Furthermore, all other landscaping would comply with all requirements of the LAMC and the City's Urban Forestry Division's requirements. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the impacts would be less than significant.

No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Therefore, the Project would not conflict with such plans, and no impact would occur.

e. Geology and Soils (Except for Paleontological Resources)

No active faults with the potential for surface fault rupture are known to be located directly beneath the Project Site. Therefore, the Project would not be subject to, or exacerbate the possibility of, fault rupture as no faults bisect the Project Site. A less than significant impact would occur.

The Project Site is located within the seismically active Southern California region and is potentially subject to strong seismic ground shaking from earthquakes on area faults (such as the Hollywood Fault located 4.4 miles to the north or the upper limb of the Upper Elysian Park Fault located 1 mile to the northeast). A maximum moment magnitude of 6.4 is estimated for the Upper Elysian Park Fault. However, with compliance with applicable regulatory requirements (e.g., Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code) and the site-specific recommendations of the required final design-

level geotechnical engineering report, the Project would not be subject to or exacerbate strong seismic ground shaking, and the impact would be less than significant.

The majority of the Project Site is not located within an area identified as having a potential for liquefaction, and while a small area in the southeastern portion of the Project Site is within an area subject to liquefaction, the Geotechnical Report prepared for the Project indicates that because the Project would be anchored in bedrock, the potential for liquefaction (including lateral spreading) at the Project Site is considered low. Hence, the Project would not be subject to, or exacerbate the possibility of, liquefaction, and the impact would be less than significant.

Although the Project Site contains slopes ranging from 4:1 to 2:1 (horizontal to vertical), the Project Site is landscaped and does not include exposed soils which could landslide during a rain event. Furthermore, the Project would over excavate the Project Site, re-engineer (e.g., compact, etc.) the soils at the site, and anchor the proposed concrete foundations in bedrock which would eliminate the potential for landslides. Therefore, the Project would not be subject to, or exacerbate the possibility of, landslides, and the impact would be less than significant.

The Project would include grading and excavation during construction that could increase the potential for erosion during the construction period. However, Project grading and excavation activities would be subject to City grading permit requirements, including those required to control soil erosion and the loss of topsoil. Regarding soil erosion during Project operations, the potential for soil erosion would be relatively low since the Project Site would be fully developed and no soils would be left exposed, and the Project would be required to comply with National Pollutant Discharge Elimination System (NPDES) Permit requirements related to limiting soil erosion and the loss of topsoil. With compliance with existing regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil, and the impact would be less than significant.

Regarding unstable geologic units, as indicated above, the Project would not be subject to or exacerbate liquefaction (including lateral spreading) or landslides. Also, due to the type and density of the soils underlying the Project Site, the Geotechnical Report concludes that the site does not contain collapsible soils. In addition, because there is no large-scale extraction of groundwater, gas, oil or geothermal energy in the immediate vicinity of the Project Site, the Geotechnical Report concludes that the potential for subsidence is minimal to nonexistent at the Project Site. Hence, the Project would not be subject to, or exacerbate the possibility of, unstable geologic units, and the impact would be less than significant.

According to the Geotechnical Report, the soils at the Project Site are anticipated to be primarily of low expansion potential. However, moderately expansive soils could be

locally present. Notwithstanding, the Project would over excavate the Project Site, re-engineer (e.g., compact, etc.) the soils at the site, and anchor the proposed concrete foundations in bedrock, which would address the potential effects resulting from expansive soils. Therefore, the Project would not be subject to, or exacerbate the potential for, expansive soils, and the impact would be less than significant.

Lastly, the Project would be served by the municipal sewer system rather than by septic tanks or alternative wastewater systems, and thus would have no impact related to the ability of soils to support such tanks/systems.

f. Hazards and Hazardous Materials

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be routinely used on the Project Site through the duration of construction. During operation, small quantities of potentially hazardous materials typical of those used in residential, hospitality, educational/civic, and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping and pools could be used. However, during both construction and operation, all potentially hazardous materials would be transported used, handled, stored and disposed of in accordance with applicable federal, state and local regulations (e.g., RCRA, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by the City of Los Angeles Department of Building and Safety) and manufacturers' specifications. Hence, the Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, or exacerbate existing such hazards, and the impact would be less than significant.

Per the Phase I Environmental Site Assessment (ESA) prepared for the Project, no evidence of aboveground storage tanks (ASTs) or underground storage tanks (USTs), unusual odors, pools of liquid and standing surface water, pits ponds, lagoons, drums, hazardous substances or petroleum products storage containers, unidentified substance containers, stains or corrosion, stained soil/pavement or stressed vegetation, solid waste or imported fill soil, wastewater discharge systems, septic systems, or wet areas or surface water bodies were observed on-site during the field reconnaissance. In addition, no pad- or pole-mounted transformers or electrical control panel equipment, which could contain polychlorinated biphenyls (PCBs), was observed on-site. The Phase I ESA identified the following recognized environmental conditions (RECs) on the Project Site: (1) three previous fuel oil USTs, the removal of which cannot be confirmed; (2) a former on-site laundry where petroleum- and chlorinated-based solvents were likely used; and a former on-site printing business where various inks, pigments and solvents were likely used. The Phase I ESA also identified the following items that, while not RECs, could be concerns at

the Project Site, including: (1) an industrial waste discharge permit for a former on-site auto wash rack; (2) a former on-site automobile repair shop; and (3) an industrial waste discharge permit for bleed-off from a former on-site cooling towner. Project excavation activities during construction could potentially encounter USTs and/or contaminated soil associated with the above if such contaminated soils are present. However, in the event that contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166 which requires a mitigation plan approved by SCAQMD that includes removal of any discovered USTs, vapor monitoring, and remediation of any contaminated soil in accordance with existing regulations. With adherence to existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and the impact would be less than significant.

Existing schools within a 0.25 mile of the Project Site include the Colburn School located at 200 South Grand Avenue. As discussed above, the Project would use hazardous materials during construction and operation typical of a mixed-use residential and commercial project. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Lastly, the operation of the Project would not emit hazardous materials or handle hazardous wastes within the Project Site that could affect the operation of an educational space on-site. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school, and the impact would be less than significant.

Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. A review of the Cortese List and other applicable regulatory hazardous materials databases in the Phase I ESA indicates that the Project Site is listed in Environmental Data Resources databases for the former on-site automobile repair shop (with wash rack) and laundry facility. Records indicated that the automobile repair shop included three fuel/oil USTs, that both businesses utilized hazards materials, and that EPA manifests are on record for on-site hazardous waste identified as "inactive (meaning that one of these business, or other former business at the Project Site generated hazardous waste at the Project Site). However, as indicated previously, if USTs and/or soil contamination is discovered at the Project Site during Project excavations, the USTs would be removed per applicable City requirements and any soil contamination would be remediated in accordance with SCAQMD Rule 116. Therefore, the Project would not be located on a site which is

included on a list of hazardous materials sites pursuant to Government Code Section 65962.5 that 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. The impact would be less than significant.

The Project Site is not located within an airport land use plan or within 2 miles of an airport. The nearest airport to the Project Site is Los Angeles International Airport, which is located approximately 12 miles southwest of the Project. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and no impact would occur.

According to the Safety Element of the City of Los Angeles General Plan, none of the streets directly adjacent to the Project Site are designated disaster routes. The nearest designated disaster routes to the Project Site are Figueroa Street approximately 0.3 mile to the west and Temple Street approximately 0.5 mile to the north. While limited off-site construction activities may occur in adjacent street rights-of-ways which could potentially require temporary lane closures during the construction period, the remaining travel lanes would be maintained in accordance with standard construction management plans. Furthermore, the Project would not close any existing streets or travel lanes during operation and would comply with LAFD emergency access requirements. Therefore, the Project would not impair implementation or physically interfere with an adopted emergency response or evacuation plan, and the impact would be less than significant.

There are no wildlands located on or in the vicinity of the Project Site. The Project Site is located in an urban area and surrounded on all sides by urban development. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No impact would occur.

g. Hydrology and Water Quality

During Project construction, stormwater runoff could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff, and the storage, handling and use of chemicals could result in pollutant discharges. During Project operation, the Project would generate urban pollutants (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas) typical of a large mixed-use project which could be carried from the Project Site in stormwater runoff. However, during construction, the Project would be required to implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES Construction General Permit that outlines Best Management Practices (BMPs) to control stormwater runoff from the construction site and sediment and pollutants in this runoff. Project excavation and grading activities would be required to

obtain a City grading permit that includes required erosion and sediment control requirements, and any construction dewatering would be required to be treated and disposed of in accordance with Los Angeles Regional Water Quality Control Board (LARWQCB) discharge requirements. The Project would also be required during construction to remove any USTs and remediate any contaminated soil in accordance with applicable regulations (SCAQMD Rule 1166, etc.) which would avoid any associated contamination of surface water or groundwater during construction. Also, during operation the Project would be required under the City's LID Ordinance to infiltrate, evapotranspire, capture and use, and/or treat through high efficiency BMPs on site for the volume of water produced by the 85th percentile storm event. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards. Lastly, the Project would not include new USTs that would have the potential to expose groundwater to contaminants. With adherence with applicable regulations, the Project would not violate water quality standards or waste discharge requirements, otherwise substantially degrade surface or ground water quality, or result in substantial erosion or siltation, and the impact would be less than significant.

Regarding groundwater supplies and recharge, the Project could potentially require dewatering during construction and would increase impervious surfaces from approximately 20 percent to approximately 100 percent of the Project Site. However, any construction dewatering would be limited and temporary such that it would not substantially impact groundwater supplies, and the Project would comply with the City's Low Impact Development (LID) Ordinance which requires that use of pervious pavement and other strategies to maximize perviousness as well as the recapture and reuse of rainwater for landscape irrigation. Also, the Project Site is not a material source of groundwater recharge for the basin. Furthermore, no water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. The impact would be less than significant.

As indicated previously, the Project would increase impervious surfaces at the Project Site from approximately 20 percent to approximately 100 percent of the Project Site. This would increase stormwater runoff from the Project Site. However, during the 50-year frequency design storm event, the expected total increase in runoff would be 0.27 cubic feet per second, a 3.9 percent increase from the 6.89 cubic feet per second during pre-Project conditions. Furthermore, while the Project would slightly increase the 50-year peak flow rate from the Project Site, the existing site runoff pattern would remain. Even in the built condition, stormwater would continue to flow from Olive Street to Hill Street, west to east across the Project Site, and discharge onto Hill Street. The Hydrology and Water Quality Report concluded that the Project would not cause flooding, would not

create runoff volumes that could exceed the capacity of existing infrastructure, or require the construction of new stormwater infrastructure to accommodate post-project hydrology conditions in either normal or peak stormwater scenarios. Flows would be accommodated by the proposed on-site and existing off-site stormwater treatment and conveyance systems. Lastly, no streams or rivers bisect the Project Site. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner that would result in flooding on- or off-site or exceed the capacity of the stormwater drainage system. Impacts would be less than significant.

The Project Site is not located within a designated 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or City. The Project Site is located in an urbanized area of downtown Los Angeles and there are no rivers, streams, or other water bodies (natural or urban) that could flood flow on or through the Project Site. Therefore, the Project would not impede or redirect flood flows, and no impact would occur.

The Project Site is not located within a designated 100-year flood hazard area or near any urban or natural water bodies and is located approximately 13 miles from the coastline. The Project would not be subject to inundation by 100-year flood flows, tsunamis or seiches. Thus, the Project would not be subject to the potential for the release of pollutants due to Project inundation by floodwaters, tsunamis or seiches, and the impact would be less than significant.

The Project Site is located within the Los Angeles River Watershed Reach 2 in the Los Angeles Basin. According to the State Water Resources Control Board (SWRCB), pollutant constituents of concern listed for the Los Angeles River Reach 2 under California's Clean Water Act Section 303(d) List include cadmium (sediment), copper (dissolved), lead, selenium, zinc, E. Coli, and trash. Potential pollutants generated by the Project would be typical of a mixed-use residential, hotel and commercial project and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Upper Los Angeles River Watershed. Hence, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan, and the impact would be less than significant.

h. Land Use and Planning (Division of an Established Community, Conflicts with an HCP or NCCP)

The Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. The Project would be developed on a largely fenced-off vacant urban infill site surrounded on all sides by urban development, would not close any existing streets, and would provide pedestrian circulation through and across the Project Site where no such circulation opportunities currently (e.g., would provide on-site pedestrian connections between Downtown's Historic Core and Bunker Hill, and between Angels Flight, California Plaza and the on-site Metro portal). Therefore, the Project would not physically divide an established community. The impact would be less than significant.

The Project Site is not subject to a Habitat Conservation Plan (HCP) or Naturally Community Conservation Plan (NCCP). Therefore, the Project would not conflict with such plans, and no impact would occur.

i. Mineral Resources

No mineral extraction operations currently occur on the Project Site, the Project Site is not located within a City-designated Mineral Resource Zone, a mineral producing area as classified by the California Geologic Survey, or within the limits of an oil field according to the California Division of Oil, Gas and Geothermal Resources (DOGGR) Well Finder System. Furthermore, no mineral extraction occurs on or in the immediate vicinity of the Project Site. Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and would not result in the loss of availability of a delineated locally-important mineral resource recovery site. No impact would occur

j. Noise (Airport/Aircraft Noise)

The Project Site is not located within the vicinity of a private airstrip, an airport land use plan, or within 2 miles of an airport. The nearest airport to the Project Site is Los Angeles International Airport (LAX), located approximately 12 miles to the southwest. Therefore, the Project would not expose people residing or working in the Project area to excessive airport or aircraft noise levels, and no impact would occur.

k. Public Services (Parks, Libraries)

The Project would include: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and

amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. These uses would generate a demand for parks and libraries.

Regarding parks, there are approximately 15 City neighborhood, community and regional parks and recreational facilities within a 2-mile radius of the Project Site. There are also private parks and recreational facilities (such as the adjacent California Plaza and Angels Flight). The Project would provide 56,881 square feet of common open space which would be publicly accessible during daylight hours, as well as private open space for use by the Project residents and/or employees, which would exceed City open space requirements (e.g., LAMC Section 12.21-G and those of the Bunker Hill Specific Plan). In addition, the Project would pay: (1) Quimby Act fees to the City (as implemented by LAMC Section 17.12) which are fees the State has authorized local jurisdictions to collect from residential subdivision, as offset by any dedication of land for park and recreational facilities to respond to the increased demand for park space caused by development; and (2) applicable fees of the City's Park Fee Ordinance which increases the Quimby fees and provides a new impact fee for non-subdivision projects. Furthermore, while the Project's residents, visitors, and some of the new employees would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Hence, new or expanded public parks would not be required to serve the Project

Regarding libraries, four of the five branch libraries that would serve the Project Site currently meet library sizing standards. The Project would also be served by the Los Angeles Public Library (LAPL) 538,000 square feet Central Library located only 0.22 mile to the west which substantially exceeds the LAPL's size standard of up to 20,000 square feet for a Regional Branch. The Project Site is thus well served by existing public libraries. In addition, library usage by Project residents would be split among multiple libraries rather than concentrated at a single library. Project residential units would be equipped with individual internet serve which would provide information and research capabilities without visiting the local branches, and the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, hotel occupancy tax, etc.) that could be applied toward the provision of library facilities and service. Hence, no new or expanded public libraries would be required to serve the Project

Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental park and library facilities, need for new or physically altered park and library 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. The impacts would be less than significant.

l. Recreation

Refer to the discussion under Public Services (Parks and Libraries) above. As indicated therein, the Project would not increase the use of existing parks such that substantial physical deterioration of the facilities would occur or be accelerated, and the impact would be less than significant.

m. Utilities and Service Systems (Telecommunications)

Although not addressed in the Initial Study,[7] the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. This is because: (1) the Project Site is an urban infill site within Downtown Los Angeles which is already fully developed with telecommunications infrastructure; (2) telecommunications infrastructure exists along the existing streets bordering the Project Site[8]; and (3) it is anticipated that the only new telecommunications infrastructure required to serve the Project would be connections of the proposed uses to the existing telecommunications lines in the adjacent streets. Therefore, the impact would be less than significant.

n. Wildfires

The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. Furthermore, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or fire buffer zone, State Responsibility Area (SRA) for wildfires, or a very high fire hazard severity zone. Therefore, no impact would occur.

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[7] *In January 2018, the Office of Planning and Research proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems and included additional thresholds to address wildfires. This Draft EIR considers the revised thresholds for the environmental topics addressed herein in Section IV, Environmental Impact Analysis. In addition, the new topic of telecommunications facilities added to the revised thresholds for utilities and service systems, as well as the new thresholds addressing wildfires, are addressed herein.*

[8] *For example, according to the ALTA/NSPS Land Title Survey Map for the Project (Sheet A007B of the Entitlement Application Plan Set for the Project) on file at the City of Los Angeles Department of City Planning, there are existing telephone lines in the segments of 4th Street, Olive Street and Hill Street abutting the Project Site.*