LOS ANGELES DEPARTMENT OF CITY PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Buena Vista Project

Case Number: ENV-2016-4064-EIR

Project Location: 1251 North Spring Street, 1030 – 1380 North Broadway, Los Angeles, California, 90012
Community Plan Area: Central City North
Council District: 1—Cedillo
Project Description: The proposed Project is a mixed-use development of residential and commercial uses consisting of up to 1,090,126 square feet (sf) of residential floor area (986 dwelling units [du], including 200 affordable du); 15,000 sf of neighborhood-serving retail uses; 23,800 sf of indoor and outdoor restaurant uses; and 116,263 sf of other outdoor spaces. The Project would include up to 1,128,926 sf of building floor area on the approximately 342,817 sf (post-dedication) Project site, resulting in a Floor Area Ratio (FAR) of 3.29 (i.e. Building FAR). Including the 116,263 sf of other outdoor space (i.e. landscaped trellis and building overhangs), the overall FAR would be 3.63 (i.e. Project FAR). The Project involves subdivision of the site into the "South Parcel" and "North Parcel" master lots and airspace lots for residential and commercial purposes. The South Parcel would include 631 du, 15,800 sf of restaurant, and 10,000 sf of retail, and three levels of parking garage situated below the street elevation of North Broadway. Built upon the parking garage would be a six-story Podium that spans the development on the South Parcel, the 26-story Building 1, and the 22-story Building 2. The North Parcel would include 355 du, 8,000 sf of restaurant, and 5,000 sf of retail space, and three levels of parking garage situated below the street elevation of North Broadway. Built upon the parking garage would be the three-story Retail Block; the six-story Courtyard Building; the 15-story North Building; and the two-story Podium connecting the Courtyard and North Building. The Project would contain approximately 56,399 sf of common open space on the South Parcel (including 31,288 sf available to the public) and 45,191 sf of common open space on the North Parcel (including 37,776 sf available to the public). A landscaped central greenspace and public walkway would be developed in the central portion of the site to connect the South and North Parcels and provide a new pedestrian amenity. All existing on-site structures would be removed, including a guard house, portable office, auto repair building, trailer, vehicle wash bay, pavement, retaining walls, utilities, and fencing.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Dudek

APPLICANT:
S&R Partners, LLC

August 2021

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1 INTRODUCTION

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

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which are described on the State of California's website https://opr.ca.gov/ceqa/ and can be reviewed online at the following website: https://www.califaep.org/docs/2020_ceqa_book.pdf.

1.3.1 Initial Study

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

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

1.3.2 Draft EIR

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

public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

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

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

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2 EXECUTIVE SUMMARY

PROJECT TITLE	**Buena Vista Project**
ENVIRONMENTAL CASE NO.	ENV-2016-4064-EIR
RELATED CASES	CPC-2016-4063-GPA-ZC-HD-ZAD-SPR; CPC-2016-4139-DA; VTT-74548

PROJECT LOCATION	1251 North Spring St., 1030 – 1380 North Broadway Los Angeles, CA 90012
COMMUNITY PLAN AREA	Central City North
GENERAL PLAN DESIGNATION	Light Industrial
ZONING	MR2-1 (Restricted Light Industrial)
COUNCIL DISTRICT	1-Cedillo

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Polonia Majas
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APPLICANT	S&R Partners, LLC
ADDRESS	737 Lamar Street, Los Angeles, CA 90031
PHONE NUMBER	(323) 223-1401

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Polonia Majas, Planning Assistant
PRINTED NAME, TITLE

August 2, 2021
DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

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3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The proposed Project is a mixed-use development of residential and commercial uses consisting of up to 1,090,126 square feet (sf) of residential floor area (986 dwelling units [du], including 200 affordable du); 15,000 sf of neighborhood-serving retail uses; 23,800 sf of indoor and outdoor restaurant uses; and 116,263 sf of other outdoor spaces. The Project would include up to 1,128,926 of building floor area on the approximately 342,817 sf (post-dedication) Project site, resulting in a Floor Area Ratio (FAR) of 3.29 (i.e. Building FAR). Including the 116,263 sf of other outdoor space (i.e. landscaped trellis and building overhangs), the overall FAR would be 3.63 (i.e. Project FAR). The Project involves subdivision of the site into the "South Parcel" and "North Parcel" master lots and airspace lots for residential and commercial purposes. The South Parcel would include 631 du, 15,800 sf of restaurant, and 10,000 sf of retail, and three levels of parking garage below the elevation of North Broadway. Built upon the parking garage would be the six-story Podium that spans the development on the South Parcel, the 26-story Building 1, and the 22-story Building 2. The North Parcel would include 355 du, 8,000 sf of restaurant, and 5,000 sf of retail space, and three levels of parking garage below the elevation of North Broadway. Built upon the parking garage would be the three-story Retail Block; the six-story Courtyard Building; the 15-story North Building; and the two-story Podium connecting the Courtyard and North Building. The Project would contain approximately 56,399 sf of common open space on the South Parcel (including 31,288 sf available to the public) and 45,191 sf of common open space on the North Parcel (including 37,776 sf available to the public). A landscaped central greenspace and public walkway would be developed in the central portion of the site to connect the South and North Parcels and provide a new pedestrian amenity. All existing on-site structures would be removed, including a guard house, portable office, auto repair building, trailer, vehicle wash bay, pavement, retaining walls, utilities, and fencing.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project site is located at 1030–1380 North Broadway and 1251 North Spring Street, within the vicinity of the Chinatown neighborhood, downtown Los Angeles, Lincoln Heights, and Dodger Stadium/Elysian Park.

The Project site is located within the Central City North Community Plan Area, immediately east of the Chinatown Redevelopment Project Area.[2] The Project site consists of Assessor's Parcel Number (APN) 5414-016-002 and is located southeast of North Broadway, north of the City's Downtown area. Figure 1, Regional Location and Vicinity Map, depicts the boundaries of the

[2] CRA/LA Chinatown Redevelopment Project. https://planning.lacity.org/odocument/82ee5ce0-fe0c-46bc-ad08-ef4e6d2bea63/Chinatown_.pdf accessed December 31, 2019.

Project site and the aerial photograph identifies surrounding land uses, roadways, and the Los Angeles River.

Primary vehicular access to the Project site is provided via North Broadway and via a short driveway that extends west from Spring Street[3] and runs under the Metro L Line tracks and onto the Project site. Regional access is available via the Hollywood Freeway (U.S. 101) to the south, which has westbound on-ramps at North Broadway and westbound off-ramps at Spring Street, and through historic Arroyo Seco Parkway (State Route [SR-110]) to the west, which has northbound off-ramps and on-ramps at Hill Street and northbound on-ramp at Stadium Way. The Golden State Freeway (Interstate [I]-5) is located approximately 0.4-mile to the north of the northern portion of the Project site.

Bus service and light rail service are provided by Metro, and bus service is also provided by the City of Los Angeles Department of Transportation (LADOT). There are two bus stops located on the northwestern boundary of the Project site, one near the North Broadway/Bishops Road intersection and the other near the North Broadway/Solano Avenue intersection. The Metro operates Lines 28, 45, and 83, all of which run on North Broadway and stop at the Project site. Two other stops are located across the street from these bus stops. Metro's Gold Line Chinatown Station at the Spring Street/College Street intersection is located approximately 400 feet south of the Project site and Metro's Union Station in Downtown Los Angeles is located approximately 0.65-mile south of the southern portion of the Project site.

3.2.2 Existing Conditions

The Project site for the proposed Buena Vista Project is approximately 8.08 acres and is partially developed, with portions of the property currently used for vehicle and equipment storage and parking. The southern portion of the Project site is partially developed with various one-story structures associated with Metro operations and maintenance-related activities, as well as vegetated sloped areas. The northern portion of the property is generally used as a construction staging/bus parking area with vegetated sloped areas. North Broadway defines the northwestern boundary of the Project site; North Spring Street is adjacent to the southern corner of the Project site; and the Metro L Line (formerly Gold Line)[4] railroad tracks run parallel and adjacent to the southeastern boundary of the Project site. The Project site generally has a long and narrow bow-tie shape, with Bishops Road located across from the approximate center of the property.

All existing structures on the site would be removed in order to accommodate the proposed Project. The southern portion of the Project site includes various structures, including a guard house at the entry gate, modular/portable office, rectangular one-story metal auto repair building with vehicle bays and roll-up doors, wood trailer shed, vehicle shelter/wash bay, metal storage containers, trash enclosure, foundation remnants[5], as well as surface parking, asphalt-paved outdoor storage yard, utility infrastructure, retaining walls, and fencing. Additionally, an approximately 2,132 square-foot addition to the rear of an existing off-site building (the "Golden Dragon Restaurant") and associated

[3] Access to the Project site from Spring Street is provided via existing access easements.

[4] The Metro Board of Directors approved an update to the naming convention in November 2018 to create Metro's new line letter system, which included conversion of the "Gold" Line to the "L" Line.

[5] As described in Section V. Cultural Resources, some buildings/structures on the Project site may be over 50 years old and therefore require further evaluation to determine if they could be historically significant, including the Golden Dragon Restaurant and the industrial building with roll-up bays and various concrete foundation remnants on the South Parcel.

parking extends into the Project site within the parcel boundary, and would require removal of the encroachment within the Project Site to accommodate the proposed mixed use development. There are no other off-site structures that encroach onto the Project site.

Access to the Project Site is currently via a driveway from Spring Street, which enters the southern portion of the site into the Metro facility area, and a driveway from North Broadway, which enters the northern portion of the Project site across from Solano Avenue. Utilities that currently serve the Project site include electricity and water from Los Angeles Department of Water and Power (LADWP), natural gas from the Southern California Gas Company (SoCalGas), and sewer service from the Bureau of Sanitation of the City of Los Angeles.

Chain-link fencing is located along both sides of the sloped area between North Broadway and the Metro tracks. This narrow strip of vacant land at the central section of the Project site across from Bishops Road consists mainly of bare ground with scattered weeds, although concrete foundations/footings, fencing, billboards, retaining wall, and trees are present. A segment of the Zanja Madre, a subsurface brick conduit that was the first irrigation ditch to convey water from the Los Angeles River to the El Pueblo de Los Angeles and local agricultural lands, is known to be within the Metro L Line property generally across from Bishops Road near the narrowest portion of the Project site, and portions may be located on the Project site.

The northern portion of the Project site includes trees, foundation remnants, billboards, and graded areas used as a storage yard for construction equipment and bus storage. This section is also surrounded by chain-link fencing along North Broadway and adjacent to the Metro tracks. The northeastern tip of the Project site slopes down towards the Metro L Line tracks, near where North Broadway transitions into a bridge over the tracks. Overhead power lines extend from off-site utility poles across North Broadway to the on-site billboards.

3.2.3 Surrounding Land Uses

The entire southeastern boundary of the Project site is adjacent to the Metro L Line tracks, followed by the Los Angeles State Historic Park. A maintenance road within the Metro L Line right-of-way runs southeast of and along the Project site boundaries and separates the Project site from the tracks. The railroad tracks are at-grade and at a lower elevation than the northeastern and central sections, but then slowly rise on an elevated platform supported by concrete columns toward the Metro Chinatown Station at the intersection of Spring Street and College Street. The tracks are approximately 22 feet higher than the ground elevation (see Figure 8A, South Parcel-Conceptual Landscaping Plan), where the existing driveway into the Project site off of Spring Street, crosses under the tracks.

Further southeast of the Gold Line tracks, the Los Angeles State Historic Park (also known as Cornfield Park) contains 32 acres of active and passive open spaces, plaza/events area, trails, a raised pedestrian bridge, and surface parking. Further to the southeast along North Spring Street are various industrial and warehouse uses, followed by a channelized portion of the Los Angeles River. The River is approximately 575 feet to the east of the Project site at the closest point on the North Parcel.

As shown on Figure 1, the majority of the northwestern boundary of the Project site is adjacent to North Broadway. A majority of the southern portion of the Project site is located behind the Mandarin Plaza commercial center. The Mandarin Plaza includes one- and two-story commercial

buildings and a two-level parking structure that front on North Broadway. South of the Project site are two- and five-story buildings of the Capitol Milling Company that house retail, restaurants, and offices. The Metro L Line Chinatown Station is located approximately 400 feet south of the Project site.

West of the Project site across North Broadway are various commercial retail and restaurant uses, St. Peter's Italian Catholic Church, Casa Italiana Cultural Center, Cathedral High School, Quan Yum Temple, offices, surface parking lots, multi-family residences, and vacant lots. Radio Hill Gardens, a hillside area featuring pathways and panoramic views of the City as well as a radio tower used by police and first-responders, is also located within close proximity to the site to the north, across North Broadway. The approximately 600-acre Elysian Park is a City-owned park that includes active and passive recreational amenities, including sports fields, bicycle paths and hiking trails located near the intersection of the Interstate 5 and State Route (SR) 110. The Solano Canyon residential neighborhood includes single- and multi-family homes located northwest of the Project site between Radio Hill Gardens and Elysian Park. The SR 110 is approximately 700 feet and Dodger Stadium is approximately 2,400 feet (0.45-mile) to the northwest of the South Parcel.

3.2.4 Zoning and Land Use Designations

As further described in Section 3.4 below, the proposed Project would require a General Plan Amendment to change the land use designation from Light Industrial to Regional Commercial, and a Zone Change to change the zoning from MR2 to C2.

3.2.4.1 Central City North Area Plan

Land use development within the City of Los Angeles is regulated by the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan (General Plan), and 35 separate community plans that comprise the Land Use Element of the General Plan. The Project site is located within the Central City North Community Plan Area (Central City North CPA) and has a land use designation of "Light Industrial". The Community Plans are implemented through the development standards in the City's Zoning Code. The Project site is zoned MR2-1 (Restricted Light Industrial).

The Central City North Community Plan serves as the major land use policy document for the area north and east of the City's downtown area and provides land use regulations and development intensity standards. The purpose of the Plan is to promote a community that[6]:

- Preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.
- Improves the function, design, and economic vitality of the commercial corridors.
- Preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance.
- Maximizes the development opportunities of future transit systems while minimizing any adverse impacts.

[6] Central City North Community Plan, Pages II-2 – II-3, https://planning.lacity.org/odocument/e06434a6-341a-48ed-97dc-8f6a85780951/Central_City_North_Community_Plan.pdf, accessed December 31, 2019.

- Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North area.

The Project site is located at the northern end of the planning area for the Central City North CPA. North Broadway is designated as Avenue II in the Circulation Map in this Community Plan. The Community Plan identifies the "Cornfield/Bullring site", which includes the Project site, as a major opportunity area for development. It was considered to have the potential to accommodate commercial development (e.g. sports arena/stadium complex)[7] or a mix of commercial and residential uses; as well as a combination of lower density office, retail, and residential uses. The majority of this property was redeveloped as the Los Angeles State Historic Park, opening in 2016.

The City of Los Angeles is in the process of updating the Central City and the Central City North Community Plans into the "Downtown Community Plan".[8] The proposed draft land use designation for the Project site would be "Community Center", with an allowable FAR of 6.0:1 to 8.5:1.[9] It should be noted that the update to the Central City and Central City North Community Plans is an ongoing process, and as such, these preliminary draft concepts are subject to change.

3.2.4.2 Zoning

The Project site is zoned MR2-1 (Restricted Light Industrial). The Light Industrial and MR2-1 designations allow for the development of various industrial and manufacturing uses. The -1 suffix refers to Height District 1, which does not specify a maximum height for commercial and industrial zones and establishes a maximum floor area ratio (FAR) of 1.5:1 per Section 12.21.1 of the LAMC.

3.2.4.3 Transit Priority Area

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5-mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the

[7] Central City North Community Plan, Pages I-8 and III-10. https://planning.lacity.org/odocument/e06434a6-341a-48ed-97dc-8f6a85780951/Central_City_North_Community_Plan.pdf, accessed December 31, 2019.

[8] City of Los Angeles, Draft General Plan Land Use Designation Map – Downtown Community Plan, https://planning.lacity.org/odocument/c1a2c3a0-f9a6-43d8-a38d-95a2aed0cf04/Downtown_Community_Plan_Draft_General_Plan_Land_Use_Designations_Map.pdf, accessed September 30, 2019.

[9] Downtown Community Plan June 2019 Draft, Page 13, https://planning.lacity.org/odocument/e373cb02-c27e-4448-ac44-0593135801ed/draft2019_downtowncp_text.pdf.

perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

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

The proposed Project includes a mixed-use development, including residential, retail, and restaurant uses. The property is a previously developed "infill" site located approximately 400 feet from Metro's Chinatown Station; as such, the Project meets the criteria established by SB 743 and ZI File No. 2542. Therefore, the Project's aesthetic impacts shall not be considered significant impacts on the environment.

3.2.4.4 East Los Angeles State Enterprise Zone

The Project Site is designated as an Enterprise Zone/Employment and Economic Incentive Program Area (EZ), shown in the City's Zoning Information and Map Access System (ZIMAS) as the East Los Angeles State Enterprise Zone.[11] EZs are geographic areas designated by City Council resolution, with approval by the California Department of Commerce under either the Enterprise Zone Act Program or Employment and Economic Incentive Act Program. Under this designation, federal, state, and city governments may provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. As listed in the LAMC Section, 12.21-A,4(x)(3), the EZ program allows for lower parking ratios for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

S&R Partners, LLC (Applicant) proposes the Buena Vista Project (Project) located at 1030–1380 North Broadway and 1251 North Spring Street, within the City of Los Angeles. The proposed Project is a mixed-use development of residential and commercial uses consisting of up to 1,090,126 sf of residential (986 du, including 200 affordable housing du); 15,000 sf of neighborhood-serving retail uses; 23,800 sf of indoor and outdoor restaurant; and 116,263 sf of other outdoor space (i.e. landscaped trellis and building overhangs)[12].

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

[11] City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 541-401-6002, http://zimas.lacity.org/documents/zoneinfo/ZI2129.pdf, generated September 11, 2019.

[12] A landscaped trellis is a structural latticed feature that can provide shade and architectural interest to outdoor spaces. Building overhangs are outdoor areas beneath a building that are not considered open space because they are not open to the sky, but can function as architecturally interesting open areas that provide shade and a pedestrian-level experience.

The Project would include up to 1,128,926 sf of building floor area on the 342,817 sf (post-dedication) Project site, resulting in a Building Floor Area Ratio (FAR) of 3.29 (i.e. Building FAR).[13] Including the 116,263 sf of other outdoor space, the overall Project FAR would be 3.63 (i.e. Project FAR).[14]

All existing structures on the Project site would be removed. On the South Parcel, demolition would include removal of a guard house at the entry gate, modular/portable office, rectangular one-story metal auto repair building with vehicle bays and roll-up doors, wood trailer shed, vehicle shelter/wash bay, metal storage containers, trash enclosure, foundation remnants, as well as surface parking, asphalt-paved outdoor storage yard, utility infrastructure, retaining walls, and fencing. Additionally, an approximately 2,132 square foot addition to the rear of an existing off-site building (the "Golden Dragon Restaurant") and associated parking extends into the Project site within the parcel boundary and would require removal to accommodate the proposed Project. A demolition permit would be required to remove this portion of the restaurant. All required and applicable permits would be obtained by the Project Applicant and/or the property owner of the Golden Dragon Restaurant. There are no other off-site structures that encroach onto the Project site.

Chain-link fencing located along both sides of the sloped area between North Broadway and the Metro tracks, concrete foundations/footings, fencing, retaining walls, and trees would also be removed as part of the Project. Existing structures to be removed include approximately 19,900 sf of buildings, as show in Table 1 below. Existing on-site billboards would either be removed or relocated within the Project site boundaries. Under current conditions, there are five single-sided billboards and three double-sided billboards on the North Parcel. Where Bishops Road dead-ends at the Project site, there are two single-sided billboards near the bus stop, and further to the south on the South Parcel, there are two single-sided billboards and one double-sided billboard. In total, the Project site has nine single-sided billboards and four double-sided billboards along North Broadway.

Table 1: Existing Uses To Be Removed

Existing Uses	Approximate Size (Square Feet)
Restaurant building (partial demolition of Golden Dragon Restaurant) [a]	2,132
Modular Offices	4,920
Maintenance Building (industrial building with roll-up bays)	12,800
Guard Station	48
Total	**19,900**

[a] Project site development requires the demolition of a 2,132 sf portion of an existing building that encroaches onto the Project site.

[13] The "Building FAR" is calculated as 1,128,926 sf of building area divided by 342,817 sf of post-dedication Project site (1,128,926 / 342,817 = 3.29). This area does not include the other outdoor space (i.e. landscaped trellis and building overhangs).

[14] The 116,263 sf of other outdoor areas that are included in the "Project FAR" calculations are provided in accordance with Case No. ZA 2007-3430 (ZAI) Zoning Administrator's Interpretation. The "Project FAR" is calculated as 1,245,189 sf of landscaped trellis and building overhang areas, divided by 342,817 sf of post-dedication Project site (1,245,189 / 342,817 = 3.63).

3.3.2 Proposed Uses

The proposed Project involves subdivision of the site into the "North Parcel" and "South Parcel" master lots and airspace lots for residential and commercial purposes. Construction is anticipated to occur in two phases: Phase 1 for the South Parcel and Phase 2 for the North Parcel.

Figure 1 identifies the locations of several notable off-site buildings and land uses. Figure 2, North and South Parcel Building Locations depicts the boundaries between the North and South Parcels and shows the general building massing and configuration on each parcel, as well as surrounding streets. Figure 3, Conceptual Site Plan, provides a top-down view of the proposed Site Plan and identifies the various proposed buildings on the Project site, number of stories within each building, nearby roadways, and view corridors that maintain views from certain roadways to the north of the Project site towards the south, as discussed further below.

South Parcel Summary. Figure 4, South Parcel- Cross-Section is a cross-section of the South Parcel as viewed from the Los Angeles State Historic Park, showing proposed building locations and the configuration of the residential, retail, amenity areas, service/mechanical, and parking areas. The cross-section also depicts the building overhang and parking levels at the South Parcel and the elevation of the adjacent Metro L Line tracks. The South Parcel would include 631 du, 15,800 sf of restaurant, and 10,000 sf of retail, and three levels of parking garage. Of the restaurant and retail uses, 18,175 sf would be located on the ground floor (Level 1), 1,075 would be located at Level 2, and approximately 750 sf of these uses located within the first level of the parking garage (Level P-1). All parking would be within the garage (Levels P-1 to P-3). Residential uses would be within each of the buildings starting at the ground level on the South Parcel. The six-story Podium Level would include 216 du, 20,000 sf of restaurant and retail uses, and 5,800 sf of exterior restaurant uses. The first four stories of the 26-story Building 1 and the 22-story Building 2 would include the Podium (which would span the length of the building footprint on the South Parcel) and these two buildings would contain an additional 231 du and 184 du, respectively. The South Parcel would include 56,399 sf of common open space, which includes 31,288 sf available to the public at the ground-level.

As shown on Figure 4, built upon the 3-level parking garage would be the six-story Podium; the 26-story Building 1; and the 22-story Building 2. The heights of the buildings (as measured from the elevation of the lowest adjacent grade within five feet of the proposed structure, per LAMC 12.03 requirements [LADBS Document No. P-ZC 2002-008]), would be 105 feet for the Podium, 347.6 feet for Building 1, and 304 feet for Building 2, which includes the height of the 3-level parking garage. The South Parcel would include an approximately 320,569 sf parking garage with 902 parking spaces and 420 spaces for bicycle parking/storage (383 long-term, 37 short-term).

Figure 5A, South Parcel – Site Elevation from North Broadway, shows the proposed buildings and their elevations, as well as the exterior architectural treatments, as described in Section 3.3.3, Design and Architecture. As shown, all parking garage levels on the South Parcel would be below the elevation of North Broadway, which is the higher elevation of the site, where the property fronts on North Broadway near Cottage Home Street at Building 2. At the Podium and at Building 1, portions of P-1 would be partially above the elevation of North Broadway, as this road has a declining slope in elevation towards the southwest; however, the partially above grade P-1 parking level would not be visible from North Broadway or areas to the northwest because views would be blocked by the existing buildings along North Broadway that are associated with Mandarin Plaza.

Figure 5B, South Parcel – Site Elevation from the South shows the proposed Building 1 and Podium and their elevations, as well as the exterior architectural treatments. Due to changes in the existing grade elevations from North Broadway to the Los Angeles State Historic Park, P-1 and P-2 of the 3-level parking garage would be visible from the Metro L Line tracks to the south, which rise in elevation towards the Chinatown Station. The parking garage would also be visible from Los Angeles State Historic Park and from the adjacent Spring Street and Baker Street to the southeast, although the rising elevation of the Metro L Line tracks and existing landscaping trees along the sidewalk of the Los Angeles State Historic Park would partially obscure views of the parking garage (also see Figure 8A, South Parcel- Conceptual Landscaping Plan). The southeastern-facing portions of the parking structure would be enclosed within a solid exterior wall at P-3, and vine plantings on the landscaped screen wall would buffer views into P-1 and P-2 of the parking garage from the Los Angeles State Historic Park, as shown on Figure 8A.

North Parcel Summary. Figure 6, North Parcel – Cross-Section of the North Parcel as viewed from the Los Angeles State Historic Park, shows the proposed building locations and the configuration of the residential, restaurant, retail, lobby/amenity, service/mechanical, and parking areas. The cross-section also depicts trellis and building overhang areas, as well as the parking levels at the North Parcel. The North Parcel would include 355 du, 8,000 sf of restaurant, and 5,000 sf of retail space, constructed above a three-level parking garage. All restaurant and retail uses would be located on the ground floor (Level 1), all parking would be within the garage (Levels P-1 to P-3, below grade from North Broadway), and residential uses would be within each of the buildings and each of the levels on the North Parcel, as well as on the southeastern side of the building facing the Los Angeles State Historic Park, where residential units would line the parking garage Levels P-1 and P-2. The three-story Retail Block would include 18 du, 8,000 sf of restaurant and 5,000 sf of retail uses; the six-story Courtyard Building would include 135 du; the two-story Podium would include 58 du; and the 15-story North Building would include 144 du. The North Parcel would include 45,191 sf of common open space, which includes 37,776 sf available to the public at the ground-level.

As shown on Figure 6, built upon the parking garage, the North Parcel would include the three-story Retail Block; the six-story Courtyard Building; the 15-story North Building; and the two-story Podium connecting the Courtyard and North Building. The heights of the buildings (as measured from the elevation of the lowest adjacent grade within five feet of the proposed structure, per LAMC 12.03 requirements [LADBS Document No. P-ZC 2002-008]), would be 73 feet for the Retail Block; 109 feet for the Courtyard Building; 212 feet and 8 inches for the North Building; and 56 feet and 4 inches for the Podium, which includes the height of the 3-level parking garage. The North Parcel includes an approximately 245,091 sf parking garage with 515 parking spaces and 240 spaces for bicycle parking and storage (216 long-term, 24 short-term).

Figure 7A, North Parcel – Site Elevation from North Broadway shows the proposed buildings and their elevations, as well as the exterior architectural treatments, as described in Section 3.3.3, Design and Architecture. As shown, all parking garage levels on the North Parcel would be below the elevation of North Broadway and would not be visible from North Broadway or from vantage points from areas to the northwest.

Figure 7B, North Parcel – Site Elevation from the Northeast shows the proposed North Building and its elevations, including the vehicular access to the parking garage, as well as the exterior architectural treatments. Due to changes in the existing grade elevations, all parking levels would be above grade near the Metro L Line tracks. Residential units facing towards the Los Angeles Historic Park would line levels P-1 and P-2, and the southeastern-facing portions of the parking

structure, facing the Los Angeles State Historic Park, would be enclosed within a solid wall at P-3 (also see Figure 9A, North Parcel- Conceptual Landscaping Plan).

Table 2 provides an overview of the Project's proposed land uses.

Table 2: Proposed Uses

Land Use	Description	Approximate Size (Square Feet)
South Parcel		
Residential	631 du	706,854
Restaurant		15,800
Retail		10,000
Trellis/ Building Overhangs		51,134
	South Parcel Total Project Area	*783,788*
North Parcel		
Residential	355 du	383,272
Restaurant		8,000
Retail		5,000
Trellis/Building Overhangs		65,129
	North Parcel Total Project Area	*461,401*
Project Site Total		
Total Residential	986 du	1,090,126
Total Restaurant		23,800
Total Retail		15,000
Total Trellis/Building Overhangs		116,263
	Total Project Area	**1,245,189**
sf: square feet; du: dwelling units		

The majority of the proposed residential units are studio units, one-bedroom units, and two-bedroom units. The Project also includes micro-units and nine live-work units[15] Table 3 includes a summary of the residential unit count for the South and North Parcels.

Table 3: Proposed Dwelling Units

Building	Micro	Studio	1- BR	2-BRs	Live-Work	Total
South Parcel						
Building 1	-	31	148	52	-	231
Podium	15	45	100	52	4	216

[15] Micro units are residential studios of approximately 400 sf. Live-work units, or "Joint Living and Working Quarters" would comply with LAMC 12.03 and is defined as "A residential occupancy of one or more rooms or floors used as a dwelling unit with adequate work space reserved for, and regularly used by, one or more persons residing there."

Table 3: Proposed Dwelling Units

Building	Micro	Studio	1- BR	2-BRs	Live-Work	Total
Building 2	-	34	116	34	-	184
Subtotal	*15*	*110*	*364*	*138*	*4*	*631*
North Parcel						
North Building	1	3	115	25	-	144
Podium	-	12	32	14	-	58
Courtyard	-	9	108	13	5	135
Retail Block	-	1	16	1	-	18
Subtotal	*1*	*25*	*271*	*53*	*5*	*355*
Total	**16**	**135**	**635**	**191**	**9**	**986**

3.3.3 Design and Architecture

The proposed Project has been designed to increase pedestrian activity on the east side of North Broadway and to increase pedestrian connectivity to the Metro L Line Chinatown Station. A combination of restaurants/retail, cafés, live-work units, public open space, and residential lobby entrances would front the public sidewalk along North Broadway. All ground floor uses are designed to maximize the visual connection to the street by providing windows that are free of reflective glass coatings, exterior mounted gates, or security grilles.

The proposed building architecture is shown in Figures 5A and 5B for the South Parcel, and on Figures 7A and 7B for the North Parcel. As shown, the proposed architecture reflects the industrial character of past land uses by utilizing cast-in-place concrete walls, structural steel, metal panels, fiber cement board, and glass/steel guardrails. Variations in the textures, colors, and sizes of these materials would allow for a unified design that links the overall Project while differentiating individual buildings. Building massing and scale would provide vertical and horizontal plane changes along the façades of the buildings and provide a strong visual connection between the North and South Parcels. Retaining walls would likely be required adjacent to the driveway and Fire Lane from Spring Street on the South Parcel, and adjacent to the northernmost driveway on the North Parcel, which would be below grade from the elevation of North Broadway.[16] The two vehicular driveways located in the center of the North Parcel would also serve as Fire Lanes (see Figure 11, Circulation Diagram).

As shown on Figure 4, South Parcel- Cross-Section and Figure 6, North Parcel- Cross-Section, rooftop terraces with pool decks would provide private outdoor open space amenities for residents. All outdoor ground-level hardscape areas, including promenades, seating areas, courtyards, and plazas, would be publicly accessible and promote activity at the street level. On the South Parcel, building overhangs would be located throughout the site on Podium-level as well as beneath Buildings 1 and 2 on top of the Podium to provide shade and a pedestrian-scale character for outdoor spaces. On the North Parcel, building overhangs would be predominantly located beneath the Courtyard Building, as well as above the Podium beneath the North Building.

[16] Proposed retaining walls would be in compliance with LAMC regulations, without any request for deviations from the LAMC requirements.

The central greenspace between the buildings on the North and South Parcels is intended to maintain views of the Los Angeles State Historic Park and areas to the southeast of the Project site from public vantage points along North Broadway and from public areas to the northwest of the Project site along Bishops Road and Savoy Street. As shown on Figure 3, views through the Project site to the southeast would be maintained by architectural breaks within each parcel. As shown on Figure 4, an open area at ground-level would provide partial views from Cottage Home Street near North Broadway at the primary ingress/egress driveway on the South Parcel. As shown on Figure 6, an open area with a landscaped trellis structure at ground-level would provide views from Solano Avenue near North Broadway, and a landscaped trellis structure on the two-level Podium would provide views from upslope areas of Casanova Street on the North Parcel. These breaks in massing have also been designed to provide outdoor open space amenities for both the public and Project residents. Decorative landscape plantings are proposed along North Broadway at the openings between buildings to provide a continuous visual presence at the street level. Other nearby streets would not experience the same views through the Project buildings.

3.3.4 Open Space and Landscaping

Open space and landscaped areas have been located and distributed throughout the Project site. Landscaping would be provided in conformance with applicable LAMC Section 12.21.G.2(a), which requires that 25% of common open space is planted/vegetated and LAMC Section 12.21 G.2(a)(3) which requires one 24-inch box tree for every four dwelling units proposed on site. The Project includes approximately 29,952 sf of vegetated common open space areas. Each building would have outdoor open space areas designed for passive and active uses. These areas are located throughout the development and are designed to take advantage of the views of Downtown Los Angeles, as well as Los Angeles State Historic Park. Swimming pools, decks, lounge areas, viewing platforms, and multi-level amenities with viewing roof decks would be provided on-site. In addition, private and public plaza spaces would be provided throughout the Project site. Balconies have been provided throughout the buildings. Table 4, Project Open Space, outlines the proposed open space within both the South and North Parcel.

Table 4: Project Open Space

Open Space	Approximate Size (Square Feet)
South Parcel	
Ground Level Courtyards (publicly accessible)	31,288
Level 2 Terraces	1,060
Level 4 Terraces	3,689
Level 5 Terraces	8,381
Level 22 Terraces	6,020
Level 26 Terraces	5,952
Common Open Space Subtotal	***56,399***
Private Open Spaces	1,926
Private Open Space Subtotal	***1,926***
South Parcel Total Open Space	**58,325**
Open Space Required per LAMC 12.21.G.2	*54,050*

Table 4: Project Open Space

Open Space	Approximate Size (Square Feet)
North Parcel	
Ground Level Courtyards (publicly accessible)	37,776
Level 6 Terraces	4,659
Level 14 Terraces	2,756
Common Open Space Subtotal	***45,191***
Ground Level Private Terraces and Open Space	1,735
Level 2 Private Balcony Terraces	4,560
Private Open Space Subtotal	***6,295***
North Parcel Total Open Space	**51,486**
Open Space Required per LAMC 12.21.G.2	*34,225*
sf: square feet	

South Parcel. The conceptual landscaping plan for the South Parcel is shown in Figure 8A, South Parcel – Conceptual Landscaping Plan and Figure 8B- South Parcel- Courtyards Landscaping. As shown on these Figures, the South Parcel includes the "hill climb" climbing stairs with a landing area and outdoor tables that would allow access from the Project site to the adjacent Capitol Mill property to the south. As shown on Figure 8A, Level 5 proposes two landscaped terraces on top of the Podium. Additionally, P-1 and P-2 would include a landscaped screen wall, which would buffer views into P-1 and P-2 of the parking garage from the Los Angeles State Historic Park, which would buffer views into P-1 and P-2 of the parking garage from the Los Angeles State Historic Park along the frontage facing the Metro L Line. Species planted on the landscaped screen wall would include Catalina Ironwood (Lyonothamnus floribundus), Coast Live Oak (Quercus agrifolia), Desert Willow (Chilopsis linearis), and Sonoran Palo Verde (Parkinsonia praecox). All proposed plant and tree species would be drought resistant and require low water use. The South Terrace is adjacent to Building 1 and includes a swimming pool with outdoor seating and barbecue areas, raised planters, and outdoor lounge areas. The North Terrace is adjacent to Building 2 and contains outdoor seating areas, planters, lounge areas, and accessible lawn areas. The Level-26 South Deck on Building 1 and the Level-22 North Deck on Building 2 would both include a swimming pool, outdoor seating and barbecue areas, raised planters, and outdoor lounge areas. Rooftop amenity areas would be open to the sky and would not include rooftops.

As shown on Figure 8B, a fitness green courtyard area would be located between the hill climb area and Building 1, with four additional courtyards (the Entry Courtyard at Building 1, Commons Courtyard at the Podium, Gateway Courtyard at Building 2, and Overlook Courtyard) facing towards the Los Angeles State Historic Park. The Gateway Courtyard includes a streetscape connection to North Broadway. As shown on Figure 8B, a pedestrian promenade would connect the courtyard areas, which would be partially covered by building overhangs to provide shade. The pedestrian promenade would be a ground-level linear pedestrian public walkway that overlooks the Los Angeles State Historic Park. Landscaped trellis structures would provide shade for the restaurant and retail areas on the ground-level. Just north of Building 2, as the site transitions into the central greenspace, which is a vegetated public greenspace that connects the

North and South Parcels. Outdoor dining areas and outdoor seating would provide views of the Los Angeles State Historic Park. A small terraced amphitheater seating area would be adjacent to the Overlook Courtyard, which transitions to the sloped and vegetated greenspace area. As shown in Figure 8B, trees would be planted along the Project site fronting North Broadway.

The South Parcel includes approximately 56,399 sf of common open space and 1,926 sf of private open space, for a total of approximately 58,325 sf of open space. Of this amount, approximately 31,288 sf of open space would be publicly accessible on the ground-level. As previously stated, the parking structure would not be visible from North Broadway. The southeastern-facing portions of the parking structure would be clad with a concrete exterior wall at P-3, and the upper levels would be partially obscured by the rising elevation of the Metro tracks on the South Parcel. Additionally, landscaping trees would be located on the podium and terraces, and vine plantings on the landscaped screen wall would buffer views into P-1 and P-2 of parking garage from the Los Angeles State Historic Park, as shown on Figure 8A.

North Parcel. The conceptual landscaping plan for the North Parcel is shown in Figure 9A, North Parcel – Conceptual Landscaping Plan and Figure 9B, North Parcel –Garden Terraces Landscaping. As shown on these Figures, the North Parcel includes a garden dining terrace, public shopping gardens, public garden plaza and kiosks, landscape trellis, and associated raised planters and seating. As shown on Figure 9A, the buildings on the North Parcel use large landscaped trellis structures to allow plantings to grow up and over the viewing deck of the Los Angeles State Historic Park and also on the rooftop amenity decks to provide shade and a pedestrian-scale to the outdoor seating areas. Rooftop amenity areas would be open to the sky and would not include rooftops. Also, large building overhangs are provided for outdoor walkways to create pedestrian-scaled spaces along the open space areas on the North Parcel.

As shown on Figure 9B, the sidewalk near the North Building would link to a proposed off-site signalized crosswalk across North Broadway that would lead towards Elysian Park. Publicly accessible outdoor dining, viewing, and seating areas (see Garden dining terrace, Public garden plaza, Landscaped trellis in Figure 9B) would provide views of the Los Angeles State Historic Park. Just south of the Retail Block building, the site transitions into the central greenspace. As shown in Figure 9B, trees would be planted along the Project site fronting North Broadway.

The North Parcel includes approximately 45,191 sf of common open space and 6,295 sf of private open space, for a total of approximately 51,486 sf of open space. Of this amount, approximately 37,776 sf of open space would be publicly accessible on the ground-level. As previously stated, the parking structure would be below the grade of North Broadway. The southeastern-facing portions of the parking structure would be lined by residential units on the P-1 and P-2 levels of the parking structure on the North Parcel, and the P-3 ground-level would be clad with a concrete exterior wall, as seen from the Los Angeles State Historic Park, as shown on Figure 9A.

Central Greenspace. As depicted on Figure 10, Central Portion – Conceptual Landscaping Plan, and described above, a landscaped greenspace would be constructed in the central greenspace portion of the Project site to provide a new public amenity to showcase the views of surrounding areas to the southeast of the Project site, including views of Downtown Los Angeles, the Los Angeles State Historic Park, and Union Station. The open space area that links the North and South Parcels would be vegetated with native trees and understory vegetation. A public walkway would connect the North and South Parcels and would be located where they would not have a grade elevation change of 30 feet or more. Downslope from the public walkway, the majority of

the central greenspace would be comprised of a landscaped and planted slope that would be inaccessible to pedestrians.

As part of the Project, existing vegetation, including trees, would be removed. As indicated in Appendix A, 2016 Tree Report. 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum, there are 20 trees on the site with a diameter at breast height of eight inches or greater. These include 18 Canary Island date palm (*Phoenix canariensis*) trees, one Mexican fan palm (*Washingtonia robusta*), and one desert fan palm (*Washingtonia filifera*) tree. The Canary Island date palm trees are located at the northeastern section of the site, clustered together at the northern end except for one tree, and the Mexican fan palm and Desert fan palm trees are located at the southwestern section, generally north of Cottage Home Street. These trees are not protected under the City of Los Angeles Native Tree Protection Ordinance; this ordinance protects specific indigenous trees with a diameter at breast height of four inches or greater, including oaks (*Quercus* sp., except for *Quercus dumosa*), Southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*), Mexican Elderberry *(Sambucus mexicana*), and Toyon (*Heteromeles arbutifolia*).[17]

The landscaping plan includes new street trees along the east side of North Broadway to provide shade to pedestrians and to connect to a ¼-mile walking path that incorporates a series of perches that provide new vistas and resting areas that extend beyond the existing sidewalk. In total, the landscape plan would add approximately 247 trees to the Project site. The Project would incorporate a mix of native plant materials along with Mediterranean and Australian plants, which are suitable for the Southern California climate and are considered low water use. Shade trees would be provided in both areas for active use and passive pedestrian areas.

3.3.5 Access, Circulation and Parking

As shown on Figure 11, Circulation Diagram, access to the Project would be provided by one driveway on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel from Spring Street. The South Parcel driveway from Spring Street would be located beneath the elevated Metro L Line tracks.

Approximately 0.21-acre (3-feet along the length of the Project site) of land within the Project site would be dedicated to the City areas public right-of-way along North Broadway.

A total of 1,417 parking spaces would be provided on-site, which meets LAMC requirements.[18] The South Parcel includes a 320,569 sf parking garage with 902 parking spaces and 420 spaces for bicycle parking and storage (383 long-term, 37 short-term). The North Parcel includes three levels of parking lined with two levels of 58 dwelling units that are below the elevation of North Broadway and that face the Los Angeles State Historic Park. The North Parcel includes a 245,091

[17] LAMC §§ 17.02, 17.05(R).

[18] The parking ratios from LAMC Section 12.21A.4(a)(b) for residential uses and LAMC Section 12.21A4(x)(3) for commercial retail and restaurant uses were applied to the Project. Per LAMC Section 12.21.A4, a project may replace up to 10% and 20% of its residential vehicle parking and non-residential vehicle parking, respectively, and a project located within 1,500 feet of a major transit station may replace up to 15% and 30% of its residential vehicle parking and non-residential vehicle parking, respectively, with bicycle parking at a ratio of four bicycle parking spaces to one vehicle parking space. The Project would replace approximately 11% of the LAMC-required residential vehicle parking with bicycle parking. The net LAMC-required vehicle parking after reductions is 902 and 515 vehicle parking spaces for the South Parcel and North Parcel, respectively, for a total of 1,417 required vehicle parking spaces.

sf parking garage with 515 parking spaces and 240 spaces for bicycle parking and storage (216 long-term, 24 short-term). The proposed Project would include electric vehicle (EV) parking and charging stations in accordance with applicable LAMC requirements (Sections 99.05.106.5.3.3 and 99.05.106.5.3.6 of Article 9 of Chapter IX of the LAMC).

3.3.6 Lighting and Signage

Architectural lighting is proposed to complement key architectural features of each building through the use of low profile, low wattage light-emitting diode (LED) building-mounted fixtures and fixtures integrated into the building facades. Low intensity LED luminaires, pedestrian poles, decorative lanterns, lighted bollards, and recessed step lights would also be used.

Low glare fixtures and decorative fixtures would be located at the ground level of each building to create a sense of arrival and scale, and includes the use of building-mounted decorative fixtures, low level landscape lanterns, and floor lamps. The security lighting for the exterior courtyards and pedestrian walkways includes a combination of low-intensity LED luminaries, pedestrian poles, decorative lanterns, bollards, and recessed step lights. All exterior lighting would be designed to meet minimum light levels for emergency egress and to comply with the requirements of the California Building Code (Title 24 of the California Code of Regulations) and the California Green Building Standards (CALGreen) Code.

Signage would be located at a height and of size that is visible to pedestrians and that facilitates access to the building entrances. Existing on-site billboards would either be removed or relocated within the Project site boundaries. A wayfinding signage system would be located along the public walkways through the Project site, which would facilitate pedestrian passage through the Project site to and from the Metro Chinatown Station.

3.3.7 Roadway and Pedestrian Improvements

North Broadway is classified as an Avenue II in Mobility Plan 2035. The half right-of-way width for this roadway classification is 43 feet, which includes a roadway pavement of 28 feet, as measured from the road centerline to the curb face and a 15-foot-wide parkway and sidewalk. In the existing condition, the half street right-of-way width of North Broadway is only 40 feet along the Project site frontage. This includes a roadway pavement width of 36 feet and a sidewalk ranging from four to 10 feet at the bus stop areas. As part of the Project, three feet of right-of-way width would be dedicated to the City of Los Angeles and would be incorporated into the public right-of-way to bring the total half right-of-way width to 43 feet and the total sidewalk width of seven feet. If required by the City, the sidewalk could be further widened to more than seven feet by reducing the street's roadway pavement width accordingly.

The proposed curb cuts for new driveways into the Project site would be located along North Broadway in a manner that does not reduce on-street parking. Unused curb cuts and driveways would be replaced with sidewalks to maintain continuity for pedestrians. There would be no changes to existing signalized pedestrian crosswalks across North Broadway (at its intersections with Cottage Home Street, Bishops Road, Solano Avenue, Casanova Street, and Elysian Park Drive). However, the Project proposes a crosswalk with a signal at the northeastern tip of the Project site to connect with the adjacent Elysian Park.

While the Project site and the segment of North Broadway fronting the site are located outside the Cornfield Arroyo Seco Specific Plan (CASP), the CASP designates North Broadway for Street Tree Variety No. 1, which includes a list of permitted street trees[19]. Pursuant to this requirement, the Project would incorporate appropriate street trees to be planted in tree wells along the sidewalk.

3.3.8 Utilities

The Project requires the abandonment and/or removal of existing utility connections and lines and the provision of new utility meters (for water, gas, and electrical services) and associated aboveground utility appurtenances that would be located primarily along North Broadway. These facilities would be appropriately screened via landscaping and/or building massing strategies. New on-site electrical infrastructure would be provided via underground duct banks with at-grade pad-mounted transformer equipment. All other utility service lines (i.e., water, sewer, gas, and phone/data lines) would be placed underground.

3.3.9 Sustainability Features

The Project would be built in accordance with applicable energy conservation requirements, including Title 24 of the California Building Standards Code [CALGreen], and the LA Green Building Code, and would incorporate water and energy conservation measures, as well as solid waste recycling and diversion programs. The plantings throughout the Project, including the central greenspace slopes, would increase the tree canopy and vegetated areas and provide erosion control measures.

In addition, the Project is a mixed-use development within a Transit Priority Area (TPA) that would reduce the need for vehicle use for residents due to the Project site's on-site restaurant and retail uses, proximity to local destinations and public transportation. Residents of the Project could visit the on-site commercial uses or nearby commercial uses within walking distance, and those in the live-work units could avoid commuting entirely. The Project site is located near the Metro L Line Chinatown Station, which would allow residents and employees to go to and from the Project by light rail.

The proposed stormwater management system is a "store and use" storm water capture system that involves containment in on-site cisterns for compliance with Low Impact Development (LID) strategies. To the extent feasible, the LID Best Management Practices (BMPs) would include storm water capture, pretreatment, and re-use for on-site irrigation purposes, thus reducing the demand for seasonal potable water demands attributed to the Project's irrigation needs. On-site landscaping would use drought-tolerant plants and trees. Additionally, the Project would include solar-ready infrastructure to allow for future solar power generation, such as photovoltaic (PV) panels on rooftops of the podiums and towers, with precise locations to be determined. As previously discussed, the proposed Project would include electric vehicle (EV) parking and charging stations in accordance with applicable LAMC requirements.

[19] City of Los Angeles, *Cornfield Arroyo Seco Specific Plan*, Chapter 3.1 – Streets, pages 3-11 and 3-12, https://planning.lacity.org/EIR/CornfieldArroyo/Ord_Adopt/Web03_CASP.pdf (2013).

3.3.10 Construction Schedule

Construction of the proposed Project would be phased, with development of the South Parcel occurring as Phase 1 and development of the North Parcel occurring as Phase 2. Phase 1 is anticipated to start construction in March 2023 and end in February 2026. Phase 2 would be constructed soon after, or within a few years following completion of Phase 1, depending on market demand. For the purposes of providing a conservative analysis in the Draft EIR, Phase 2 is assumed to begin in the February 2026 to January 2029.

Grading activities would require approximately 67,000 cubic yards of export to be hauled to a landfill due to grading during Phase 1, and would require approximately 110,000 cubic yards of export during Phase 2. Exported soil and construction/demolition materials would be disposed at the Azusa Land Reclamation Disposal Facility landfill in the City of Azusa, approximately 23 miles from the Project site.

3.3.11 Off-Site Improvements

The Project would require minor off-site improvements, including but not limited to, the following:

- A new signalized crosswalk at the northeastern tip of the North Parcel that would cross North Broadway, just south of Elysian Park, to provide pedestrian connectivity with the adjacent Elysian Park, subject to the approval of LADOT.
- Sidewalk improvements, curb and gutter improvements, street tree replacements, and new driveways along North Broadway, would be required within the three-foot dedication of property to the public right-of-way, subject to the approval of LADOT, BOE and Urban Forestry. Reconfiguration and/or relocation of two existing bus stops (Broadway and Bishops Road and Broadway and Solano Avenue) subject to Metro approval,
- Removal and installation of various underground utility infrastructure.

3.4 REQUESTED PERMITS AND APPROVALS

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

- A General Plan Amendment to change the land use designation of the Project site from Light Industrial to Regional Commercial;
- A Zone Change to change the zoning for the Project site from MR2 to C2;
- A Height District change from Height District 1 to Height District 2D;
- A Zoning Administrator Determination to permit building height greater than the maximum height otherwise permitted under the Transitional Height provisions in LAMC Section 12.21.1.A.10 of 33 feet and 61 feet. At the South Parcel, the proposed building heights are 347 feet and 8 inches at Building 1, 304 feet at Building 2, and 105 feet at the Podium, and at the North Parcel, the proposed building heights are 73 feet at the Retail Block, 109

feet at the Courtyard Building, 56 feet 4 inches at the Podium, and 212 feet and 8 inches at the North Building. Consistent with LAMC Section 12.03, these heights are measured from the lowest point of the ground between the building and a line 5 feet from the building's exterior wall, to the highest point of elevation of the building or structure at each parcel;

- A Zoning Administrator Adjustment to reduce setback requirements:
    a. For the South Parcel, for the Podium at L-3 through L-5, to allow for a 13.6-foot setback in lieu of the required 17 feet at the rear lot line; and for a portion of Building 2 at L-1 through L-22, to allow a 19-foot setback in lieu of the required 20 feet at the rear lot line;
    b. For the North Parcel, for the Courtyard Building at P-2 through L-5, to allow for a 16-foot setback in lieu of the required 19 feet at the rear lot line (per LAMC Section 12.14.C); and for the North Building at P-2 through L-14, to allow a 16-foot setback in lieu of the required 20 feet at the rear lot line.
- Pursuant to LAMC Section 16.05, the Applicant requests a Site Plan Review for the development of more than 50 dwelling units;
- A Vesting Tentative Tract Map (VTTM 74548) that involves the dedication of a three-foot-wide strip along North Broadway to the City (resulting in 342,817 square feet or a net acreage of 7.87 acre Project Site) and subdivision of the Project site into two master lots and airspace lots for residential and commercial condominium purposes;
- A Haul Route approval;
- A Development Agreement;
- Certification of the Environmental Impact Report; and
- Additional approvals and permits from the City of Los Angeles Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to: demolition, excavation, shoring, grading, foundation, building and interior improvements, and sidewalk and curb/gutter improvements along North Broadway.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

Los Angeles County Metropolitan Transportation Authority (Metro): Because the Project site is within 100 feet of the Metro-owned Gold Line tracks, and because the Project may require alterations and/or relocation of the two bus stops located along North Broadway adjacent to the Project site, the Applicant must consult with Metro, who must review the Project to ensure safe access to, and operations of, its transportation services and facilities.

State Department of Conservation Geologic Energy Management Division (CalGEM): Because the Project site contains inactive oil wells, the Applicant must consult with CalGEM to confirm that the wells have been adequately abandoned.

Other potential agencies that could have discretionary approval power over the proposed Project will be determined through the scoping process for the Draft Environmental Impact Report.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[20]

PRC Section 21099 applies to the Project. The proposed Project consists of a mixed-use development, which includes residential, retail, and restaurant uses. The property is a previously developed "infill" site located approximately 400 feet from Metro's L Line Chinatown Station; as such, the Project meets the criteria established by SB 743 and ZI File No. 2542. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study is for informational purposes only and not for determining whether the Project would result in significant impacts to the environment. Any aesthetic impact analysis in this initial study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

[20] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas.

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

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

Less Than Significant Impact. SB 743 (PRC §21099(d)) sets forth criteria for evaluating certain transit-oriented infill projects under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” The related City of Los Angeles Department of City Planning Zoning Information File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and affirms that aesthetics need not be evaluated in environmental documentation prepared in accordance with CEQA for these projects. Since the Project qualifies as a mixed-use residential project on an infill site within a transit priority area, its potential aesthetic effects shall not be considered significant, and need not be studied in the Draft EIR.

For additional context related to this threshold, the Project site is located in a highly urbanized area northeast of Chinatown and Downtown Los Angeles. As shown on Figure 1, it is adjacent to the Los Angeles State Historic Park and the Metro L Line tracks on its southeastern border, with commercial and single family residential uses, multi-family residential uses and Radio Hill Gardens and Elysian Park located on the northern and western sides of the Project site. Existing uses on the Project site are limited to single-story industrial buildings and outdoor storage, staging areas for vehicles and equipment, and billboards.

The Project would remove existing structures and introduce mid- to high-rise buildings, ranging from two to 26 stories in height. The heights of the buildings on the South Parcel would be 105 feet for the Podium, 347 feet and 8 inches for Building 1, and 304 feet for Building 2, which includes the parking levels. The heights of the buildings as on the North Parcel would be 73 feet for the Retail Block; 109 feet for the Courtyard Building; 212 feet and 8 inches for the North Building; and 56 feet 4 inches feet for the Podium, which includes the parking levels. The Project development would be separated onto two parcels (i.e., North and South Parcels) with a central greenspace to connect the development areas on the two parcels, allowing for a wide view corridor between the Los Angeles State Historic Park to the southeast and developed land uses to the northwest. The Project site is not located on a designated ridgeline in the Community Plan, nor is it part of a designated scenic vista identified in local planning documents by the City of Los Angeles. As discussed above, in compliance with SB 743 and the City's Zoning Information File ZI No. 2452, aesthetic impacts of the Project shall not be considered significant, and no analysis of this topic will be provided in the Draft EIR.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. The Project site is not located adjacent to or within the viewshed of a State Scenic Highway. The nearest State Scenic Highway, a segment of State Route (SR) 2, is located 10 miles to the north of the Project site. However, the Project site is located near State Route 110 (SR-110), which has scenic and historic designations. From Pasadena to approximately the Interstate 5 overpass, SR-110 is a state-designated California Historic Parkway. This state-designated segment of the SR-110 terminates approximately 0.7 miles north of the Project site.[21] Due to this distance and intervening topography and landscaping, the Project is not expected to be visible from the state-designated Historic Parkway portion of the SR-110. The portion of the SR-110 that extends closest to the Project site is part of the National Scenic Byway system and is a City-designated Scenic Freeway.[22] [23] At its closest point, the SR-110 is located approximately 0.12-mile northwest of the Project site. The Project would be visible from this portion of the SR-110, particularly from the vantage point of southbound vehicles exiting the SR-110 at the Civic Center/Hill Street exit ramp. However, because the view would be observed from vehicles traveling on or exiting a freeway, views of the Project would be brief and fleeting.

[21] CA St & Hwy Code § 283 (2018). California Streets and Highways Code. Article 2.5, State Scenic Highways. Section 283. https://law.justia.com/codes/california/2018/code-shc/division-1/chapter-2/article-2.5/section-283/ (Accessed January 29, 2020).

[22] Federal Highway Administration, "Arroyo Seco Historic Parkway – Route 110," https://www.fhwa.dot.gov/byways/byways/10246/maps (Washington, DC: Federal Highway Administration, accessed January 2, 2020).

[23] City of Los Angeles, "General Plan Land Use Map – Central City North Community Plan," https://planning.lacity.org/odocument/2c941d9c-7285-4268-8593-44b53dbd2995/ccnplanmap.pdf (Los Angeles, CA: City of, February 25, 2014).

Furthermore, the views would be partially obstructed by existing topography, vegetation, and development between the freeway and the Project. Additionally, views from this segment of the SR-110 looking towards the Project are of the urbanized and industrial areas of Chinatown and Mission Junction. As such, the Project would not obstruct views of any scenic resources that could be visibly discerned from the SR-110. Urban development, such as the proposed Project, is an expected feature of the visible environment in downtown Los Angeles.

The nearest City-designated Scenic Highway to the Project site is on Stadium Way, which stretches from the I-5 Freeway to the State Route 110 (SR-110) Freeway. This portion of Stadium Way, which winds through Elysian Park, is located approximately 0.12-mile northwest of the Project site and views toward the Project site are obscured due to existing buildings and distance. Additionally, the portion of the Project site that could be visible from Stadium Way (via views down Bishops Road) is the central portion of the Project site that would be landscaped with pedestrian paths and would have no buildings to obstruct views. As discussed above, in compliance with SB 743 and the City's Zoning Information File ZI No. 2452, aesthetic impacts of the Project shall not be considered significant, and no analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. The Project would replace existing asphalt paved/storage areas and low-rise industrial buildings with new mid- to high-rise buildings, ranging from two to 26 stories. The Project would introduce 1,128,926 sf of building floor area on the approximately 342,817 sf (post-dedication) Project site, consisting of various residential and commercial uses. The Project would also include outdoor open spaces, landscaped areas, and pedestrian amenities. Including the 116,263 sf of other outdoor space (i.e. landscaped trellis and building overhangs), the overall FAR would be 3.63 (i.e. Project FAR). The Project would not degrade the existing visual character of the Project site; rather, it would be changed from a largely undeveloped industrial/storage site to an active pedestrian environment with a mix of land uses that would comprise a transit-oriented development.

After Project implementation, the proposed parking garages would not be visible from North Broadway. As shown on Figure 5A, South Parcel – Site Elevation from North Broadway, all parking garage levels on the South Parcel would be below the elevation of North Broadway where the property fronts on North Broadway near Cottage Home Street at Building 2. At the Podium and at Building 1, portions of P-1 would be partially above the elevation of North Broadway, as this road has a declining slope in elevation towards the southwest; however, the parking levels would not be visible from North Broadway or areas to the northwest because views would be blocked by the existing buildings along North Broadway that are associated with Mandarin Plaza.

As shown on Figure 5B, South Parcel – Site Elevation from the South and as described above, due to changes in the existing grade elevations from North Broadway to the Los Angeles State Historic Park, portions of P-1 of the 3-level parking garage would be above the grade of North Broadway. Views of P-1 and P-2 would also be visible from Los Angeles State Historic Park and would be visible from the adjacent Spring Street and Baker Street to the southeast. However, as

shown on Figure 8A, South Parcel – Conceptual Landscaping Plan, P-1 and P-2 of the parking garage would be partially screened with vines and landscaping to provide a visual continuation of the greenscape provided by the vegetated slopes in the central portion of the site. P-3 would be clad with a concrete wall on the exterior of the parking garage. Views of the parking garage from the Los Angeles State Historic Park would also be partially obscured by the elevation of the Metro tracks as they ramp up towards the Chinatown Station.

All parking garage levels on the North Parcel would be below the elevation of North Broadway and would not be visible from North Broadway or from neighborhoods to the northwest. As shown on Figure 9A, North Parcel – Conceptual Landscaping Plan, the Park-facing residential units line the parking garage on levels P-1 and P-2. Level P-3 would be clad with an exterior concrete wall.

Therefore, while the proposed parking garage on the South Parcel would be partially visible from the south and east, it would be obscured to the extent practicable and architecturally integrated into the Project through design, existing built environment features (i.e., the Metro tracks), and/or landscaping. For these reasons, the proposed parking levels are not expected to substantially degrade the visual character or quality of the site. As discussed above, in compliance with SB 743 and the City's Zoning Information File ZI No. 2452, aesthetic impacts of the Project shall not be considered significant, and no analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. The Project would introduce new light sources in the form of various outdoor lighting (building mounted fixtures, low intensity light-emitting diode [LED] luminaires, pedestrian poles, decorative lanterns, floor lamps, lighted bollards, recessed step lights, and accent lighting) at the ground floor plaza, outdoor dining areas, walkways, and lighted signs to promote visibility and security. All exterior lighting would be designed to meet minimum light levels for emergency egress and to comply with the requirements of the California Building Code (Title 24 of the California Code of Regulations) and the California Green Building Standards (CalGreen) Code. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements would be incorporated into the proposed Project. In addition, the Project would be required to comply with Chapter IX, Article 3, Section 93.0117 of the City of Los Angeles Municipal Code (LAMC), which applies to any exterior luminaire, multi-head luminaire, lamp holder, or sign light source. As discussed above, in compliance with SB 743 and the City's Zoning Information File ZI No. 2452, aesthetic impacts of the Project shall not be considered significant, and no analysis of this topic will be provided in the Draft EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

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

Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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

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

No Impact. The Project site does not support any agricultural uses or activities. It is currently developed with several buildings, parking lots, outdoor storage areas, staging areas, and disturbed/developed areas. Based on a review of the current (2016) Los Angeles County Important Farmland Map produced by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), there is no land designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance on or near the Project site.[24] Due to the predominance of urban development in the southern and central portions of Los Angeles County where the site is located, this area was not included in the FMMP mapping effort. As such, there are no designated farmlands in or near the Project site. Thus, no impact on Farmlands would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. Refer to Threshold II(a) above. The Project site is zoned MR2-1 (Restricted Light Industrial), and there is no Williamson Act contract on the site or on areas near the site. Thus, no impact on existing zoning for agricultural use or a Williamson Act Contract would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. There are no forests on or near the Project site.[25] The Project site is not zoned as forest land as defined by Section 1220(g) of the *California Public Resources Code;* as timberland as defined by Section 4526 of the *California Public Resources Code;* or as timberland zoned for timberland production as defined by Section 51104(g) of the *California Public Resources Code.* The existing zoning for the Project site is MR2-1, Restricted Light Industrial. The proposed Project would not cause the rezoning of forest land, timberland, or timberland zoned for timberland production. No impact on forest land or timberland would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. Refer to Threshold II(c) above. There is no forest land on or near the Project site that would be affected by the Project. No further analysis of this topic will be provided in the Draft EIR.

[24] FMMP, "Los Angeles County Important Farmland 2016," https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx (Sacramento, CA: FMMP, July 2017).

[25] USFS, National Forest Locator Map, https://www.fs.fed.us/ivm/ (Washington, D.C.: USFS, September 2019).

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

No Impact. Refer to Threshold II(c) above. The Project would not convert farmland or forestland to other uses. No further analysis of this topic will be provided in the Draft EIR.

III. AIR QUALITY

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

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

Potentially Significant Impact. The Project would generate short-term, construction-related and long-term operational air pollutant emissions that have the potential to affect local and regional air quality. Further evaluation in the Draft EIR would determine whether this Project would conflict with the South Coast Air Quality Management District's (SCAQMD's) 2016 Air Quality Management Plan. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The Project would generate pollutant emissions during short-term construction and long-term operation and occupancy. An air quality analysis will be conducted

to determine whether the mobile and stationary air pollutant emissions associated with the Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. These potential impacts will be analyzed further in the Draft EIR. The Project, along with several other developments planned or proposed near the Project site, could cause a considerable cumulative net increase of a criteria pollutant for which the South Coast Air Basin (SoCAB) is in non-attainment. These potential impacts will be analyzed further in the Draft EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The nearest sensitive receptors to the Project site include residential properties located across North Broadway from the Project site, and receptors at the Los Angeles State Historic Park to the southeast of the Project site. As such, there are sensitive receptors within 100 feet of the Project site that could be exposed to substantial pollutant concentrations. The air quality analysis will determine whether the potential mobile and stationary air emissions associated with the Project could result in exposure of sensitive receptors to significant concentrations of air pollutants. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. Some odors may be associated with the operation of diesel engines and building materials due to short-term construction activities, as well as from earthmoving during grading activities. Abandonment of existing oil wells on the North Parcel is required, which would also require the operation of diesel equipment. Such odors are typical of urbanized environments and would be subject to construction and air quality regulations, including proper maintenance of machinery, in order to minimize engine emissions. The oil well re-abandonment process at the Project site has the potential to release small quantities of oil-field gases including methane (odorless), hydrogen sulfide, and sulfur dioxide (sulfur rotten egg smell). The SCAQMD requires compliance with Rule 402, Nuisance, which states that discharges from any source whatsoever of air contaminants or other material that 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 are prohibited. Although construction emissions are of short duration and odors would quickly disperse into the atmosphere, the proposed Project has the potential to emit odors during earthmoving and well abandonment that could temporarily affect nearby sensitive receptors.

The proposed commercial and residential land uses would not create unusual or objectionable odors during long-term operations of the Project. No odor-generating land uses (e.g., industrial, solid waste, wastewater treatment) are proposed. Proposed residential uses would not generate objectionable odors. Future on-site commercial uses that may emit odors (from proposed restaurants) are required to secure appropriate permits from the SCAQMD in accordance with Rule 1138 to reduce off-site odors. Compliance with SCAQMD rules and permit requirements, including Rules, 401, 402 and 403 and California Health and Safety Code Section 41700 related to odors that could cause a public nuisance, would ensure that no objectionable odors would be created by the Project; therefore, the Project would not create long-term objectionable odors

affecting a substantial number of people. However, due to the potential for short-term construction-related odors, these potential impacts will be analyzed further in the Draft EIR.

IV. BIOLOGICAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Less Than Significant Impact. As previously discussed, the northern portion of the Project site includes landscaping/ornamental trees, foundation remnants, billboards, and graded areas used as a storage yard for construction equipment and bus storage. This section is surrounded by chain-link fencing along North Broadway and adjacent to the Metro L Line tracks. The northeastern tip of the Project site slopes down towards the Metro L Line tracks, near where North Broadway transitions into a bridge over the tracks. The Project site is isolated from the surrounding open space areas due to several transit corridors (i.e. North Broadway, Metro L Line), and the Los Angeles River in the vicinity of the Project site is fully paved and channelized. The adopted Central City North Community Plan designates the Project Site for Light Industrial land uses, and the Project Site is currently zoned MR2-1 (Restricted Manufacturing). Additionally, the City of Los Angeles is in the process of updating the Central City and Central City North Community Plans as part of a process known as DTLA 2040, which includes the Project site.[26] The proposed land use designation for the Project site would be "Community Center", with appropriate uses that include multi-family residential, community retail and services, office, and hotel uses.[27] It should be noted that the update to the Central City and Central City North Community Plans is an ongoing process, and as such, these preliminary draft concepts are subject to change; however, the Project site is currently zoned, and the planned zoning, are intended for urban developed land uses and not open space.

Appendix B of this Initial Study includes the Biological Resources Analysis, which includes results of the queries of relevant databases that contain information on candidate, sensitive, and/or special status species include: the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB); the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants; and the U.S. Fish and Wildlife Services (USFWS) Information for

[26] City of Los Angeles, Draft General Plan Land Use Designation Map – Downtown Community Plan, https://planning.lacity.org/odocument/c1a2c3a0-f9a6-43d8-a38d-95a2aed0cf04/Downtown_Community_Plan_Draft_General_Plan_Land_Use_Designations_Map.pdf, accessed September 30, 2019.

[27] Downtown Community Plan November 2020 Draft, Page 13, https://planning.lacity.org/odocument/4b8c3990-0ca7-4870-bd4d-59e80193d810/Draft_Plan_Nov_2020.pdf

Planning and Consultation (IPaC) Database. The results of these queries included 69 special-status plant species and 38 special-status wildlife species have recorded occurrences in the U.S. Geologic Survey's *Los Angeles, California* 7.5-minute topographic quadrangle, which contains the Project site, and surrounding quadrangles. Appendix B of this Initial Study also includes a table of the special status plant and wildlife species with known occurrences within the Project region, as well as an assessment of their potential to occur on the Project site and the results of the CNDDB, CNPS Inventory, and IPaC. As shown in the tables, the Project site does not have the potential to contain any special status plant or wildlife species.

No native habitat is located on the Project site or on the adjacent properties. Existing annual grasses, shrubs, and trees would be removed during Project construction; however, based upon the results of a site visit by a qualified biologist on June 25, 2020, the vegetated portions of the Project site are almost exclusively non-native grasses and herbaceous annual plant species that are not typically associated with supporting special-status species. There are open space areas near the Project site, but these areas, including the Los Angeles State Historic Park, appear to be regularly mowed/maintained, and do not provide native habitat for special-status species. The open space to the north of the North Parcel does not include any previously recorded occurrences of special status plant or wildlife species (see Appendix B, Biological Resources Analysis) and supports primarily non-native trees (*Eucalyptus* sp. and *Schinus* sp.) and an understory composed of non-native grasses and herbaceous annual plant species. Due to the urbanized and disturbed nature of the Project site, the site does not support habitat for candidate, sensitive, or special status species in local or regional plans, policies, or by the City of Los Angeles, CDFW, or USFWS.[28] Thus, no impact on sensitive species would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. As discussed above in Threshold IV(a), the Project site is located in an urbanized area of Los Angeles. Review of the relevant federal and state sources for the Project site and immediately surrounding areas, including USFWS National Wetland Inventory Data and CDFW Natural Community List, as well as review of aerial photographs and a field visit to the Project site conducted by a qualified biologist shows that there are no natural drainage streams or open channels on the Project site (see Appendix B). Appendix B of this Initial Study includes National Wetlands Inventory Results and aerial imagery.

The Project is northwest of the Los Angeles River, which the USFWS has identified as wetland habitat. However, there are no riparian or other sensitive natural vegetation communities identified by USFWS or CDFW located on the Project site. Historical aerials show that the Project site has been routinely disturbed or supported development since 1948. Existing annual grasses, shrubs, and trees would be removed during Project construction; however, based upon the results of a site visit by a qualified biologist on June 25, 2020, the vegetated portions of the Project site are dominated by non-native grasses and herbaceous annual plant species that do not constitute a sensitive natural community[29]. As indicated in Appendix A, 2016 Tree Report, 2020 Tree Survey

[28] Dudek, 2020. Biological Resources Analysis (Appendix B).

[29] Dudek, 2020. Biological Resources Analysis (Appendix B).

and Update Memorandum, and 2021 Tree Survey Update Memorandum, none of the trees on the Project site are native, with the exception of one desert fan palm (*Washingtonia filifera*), which is assumed to be planted since the Project site is well outside of the natural range of the species[30]. Therefore, implementation of the Project would not result in a substantial adverse impact to riparian habitat or other sensitive natural communities, and no impact would occur. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. As discussed above in Threshold IV(a), the Project site is in a highly urbanized area of Los Angeles. There are no jurisdictional waters located on the Project site;[31] therefore, no impacts to wetlands would result from Project implementation. No further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. Wildlife corridors and habitat linkages are features that promote habitat connectivity and are generally characterized as undisturbed canyon and riverine stream habitat areas. The Project site does not reside within any designated wildlife corridors and/or habitat linkages identified in the South Coast Missing Linkages analysis project, California Essential Habitat Connectivity project, or as recognized by the City.[32] The Project site is developed with several buildings, and the Project site is enclosed by several fences, with the Metro L Line tracks located adjacent and parallel to the southeastern Project boundary. North Broadway, a major arterial in the City, is located to the northwest. The developed and disturbed character of the Project site and associated fencing currently impedes wildlife movement through the Project site. Wildlife at Elysian Park and Radio Hill Gardens do not have opportunities to use the Project site for wildlife movement due to the presence of North Broadway between the Project site and these parks. Also, there are no on-site drainages or ponds that may serve as habitat for migratory fish species.

Due to the presence of physical barriers at the Project site, the Project would not affect the movement of any native resident or land-based wildlife species, nor would it affect established native resident or migratory wildlife corridors. Due to the lack of riparian or wetland habitats, the Project would not affect any native resident or migratory fish movement.

30 Consortium of California Herbaria. 2019. CCH1, online database; queried for Washingtonia filifera. Accessed April 2020. https://ucjeps.berkeley.edu/consortium/.

31 Dudek, 2020. Biological Resources Analysis (Appendix B).

32 Dudek, 2020. Biological Resources Analysis (Appendix B).

The Migratory Bird Treaty Act (MBTA) prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird.[33] Additionally, Sections 3503 and 3503.5 of the *California Fish and Game Code* make it unlawful to take, possess, or destroy the nests and eggs of birds of prey. Section 3513 of the *California Fish and Game Code* duplicates the federal protection of migratory birds and prohibits the taking and possession of any migratory non-game bird, as designated in the MBTA. The Project would be required to comply with the MBTA by preventing the disturbance of nesting birds during Project construction activities. This would generally involve clearing the Project site of all vegetation outside the nesting season (from September 1 through January 31) or if construction would commence within the nesting season (which generally runs from February 1 through August 31 and as early as February 1 for raptors), conducting a pre-construction nesting bird survey to determine the presence of nesting birds or active nests at the Project site. Any active nests and nesting birds must be protected from disturbance by construction activities through buffers between nest sites and construction activities. The buffer areas may be removed only after the birds have fledged. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No further analysis of these topics will be provided in the Draft EIR.

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

Less Than Significant Impact. As part of the Project, existing vegetation, including trees, would be removed. As indicated in Appendix A, 2016 Tree Report, 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum, there are 20 trees on the Project site with a diameter at breast height of eight inches or greater. These included 18 Canary Island date palm (*Phoenix canariensis*) trees, one Mexican fan palm (*Washingtonia robusta*), ad one desert fan palm (*Washingtonia filifera*) tree. The Canary Island date palm trees are located at the northeastern section of the site, clustered together at the northern end except for one tree, and the Mexican fan palm and Desert fan palm trees are located at the southwestern section, generally north of Cottage Home Street. These trees are not protected under the City of Los Angeles Native Tree Protection Ordinance; this ordinance protects oak trees (*Quercus* sp.) that are indigenous to California, but excludes the scrub oak (*Quercus dumosa*), as well as the Southern California black walnut (*Juglans californica* var. *californica*), western sycamore (*Platanus racemosa*), and California bay laurel (*Umbellularia californica*) trees with a diameter at breast height of four inches or greater.[34]

Three off-site jacaranda (*jacaranda mimosafolia*) street trees are located adjacent to the bus stations within the public right-of-way. As a part of the pedestrian improvements, it is anticipated that these trees would be removed. The three street trees would be replaced in accordance with the LAMC Section 62.105, which requires a permit be obtained for construction in the public right-of-way. Street

[33] The USFWS published a draft Environmental Impact Statement in support of revising the MBTA to only apply to intentional take of migratory birds. The 45-day public comment period closes July 20, 2020. https://www.fws.gov/news/ShowNews.cfm?ref=service-solicits-comments-on-a-draft-environmental-impact-statement-on--&_ID=36571

[34] City of Los Angeles. 2006b. Ordinance 177404 of the Los Angeles Municipal Code. Accessed September 2019. http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.

trees would be replaced in accordance with the City's Urban Forestry Division requirements, subject to the approval of the Board of Public Works, and at a ratio of no less than 2:1; therefore, a minimum of six new street trees would be planted to replace the impacted street trees.

The 20 existing non-protected significant trees on the Project site would be removed as part of the construction of the Project. None of these trees are native or protected under the ordinance. As the Project's landscape plan will add approximately 306 trees to the Project site, these non-native trees will be replaced at a ratio greater than the required 1:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No further analysis of this topic will be provided in the Draft EIR.

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

No Impact. The Project site is located in a highly urbanized area of Los Angeles, and there is no adopted Habitat Conservation Plan or Natural Community Conservation Plan for the site or the surrounding area.[35] No conflict with a Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

[35] Dudek, 2020. Biological Resources Analysis (Appendix B).

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

Potentially Significant Impact. The Project proposes to demolish all existing on-site buildings. Some of these buildings/structures may be over 50 years old and therefore require further evaluation to determine if they could be historically significant, including the industrial building with roll-up bays and various concrete foundation remnants on the South Parcel. It is also possible that a segment of the Zanja Madre, a subsurface brick conduit that was the first irrigation ditch to convey water from the Los Angeles River to local agricultural lands, may be located on the Project site. An exposed alignment of the Zanja Madre is located generally across from Bishops Road adjacent to the narrowest portion of the property within the Metro right-of-way for the Gold Line tracks, and a portion was discovered within the Blossom Plaza development to the south of the Project site. Additionally, the Project site is within the boundaries of the Historic Cultural Monument No. 82.[36] The Project site is adjacent to the Los Angeles State Historic Park and within the Chinatown neighborhood, which contains important cultural resources. A historic resource evaluation will be conducted as part of the Draft EIR to evaluate the significance of existing buildings and to assess any direct and indirect impacts to historic resources that could result from implementation of the Project. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The majority of the Project site is developed and has been previously graded and disturbed. However, excavation into underlying native soils (i.e., non-artificial geologic materials) through trenching, excavation, and grading has the potential to encounter archaeological resources. As previously mentioned in response to Threshold V(a), a segment of the Zanja Madre also may exist within the boundaries of the Project site. An exposed segment of the Zanja Madre is located generally across from Bishops Road adjacent to at the narrowest portion of the Project site and within the Metro right-of-way for the Gold Line tracks and a portion was discovered within the Blossom Plaza development to the south of the Project site; however, the location of the remaining alignment of the Zanja Madre is not confirmed. A cultural resources study will be conducted as part of the Draft EIR to determine whether the Project site has potential to contain archaeological resources, including the Zanja Madre. These potential impacts will be analyzed further in the Draft EIR.

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

Less Than Significant Impact. As stated in response to Thresholds V(a) and V(b), the Project site is developed with several structures and paved areas and has been previously disturbed. The Project site is not known to have been utilized for religious or sacred purposes or as a burial area.

[36] "River Station Area/Southern Pacific Railroad" Historic Cultural Monument #82, was determined by the Cultural Heritage Board on June 16, 1971 to be a monument in accordance with the provisions of Ordinance No. 121,971. The property boundary is described as between North Broadway on the West, North Spring Street on the East, Northward to the Los Angeles River and the Southeasterly corner of Elysian Park, Southward to Capitol Milling Company building. This boundary comprises the current sites of the Los Angeles State Historic Park, the Metro L Line right-of-way, and the Project Site, collectively.

If human remains are uncovered during excavation activities, the contractor would need to comply with Section 7050.5 of the *California Health and Safety Code* and Section 5097.98 of the *California Public Resources Code* on the proper identification, treatment, and disposition of the remains. This includes notification of the County Coroner within 24 hours of the discovery; protection of the discovery site from further disturbance; County Coroner notification of the Native American Heritage Commission (NAHC) if the remains are believed to be Native American; NAHC notification of the persons to be the most likely descendant (MLD) of the deceased Native American; and MLD inspection and recommendation on the disposition of the human remains, which may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials or reburial of the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance. Therefore, the Project would not have a significant potential to disturb any human remains, including those interred outside of formal cemeteries. No further analysis of this topic will be provided in the Draft EIR.

VI. ENERGY

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

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

Potentially Significant Impact. Construction and operation of the proposed Project would require the consumption of energy resources such as electricity, natural gas, and petroleum. The proposed Project would create additional electricity and natural gas demand by adding residential and commercial uses onto the site. The Draft EIR will analyze proposed consumption of energy resources. Further analysis of this topic will be provided in the Draft EIR.

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

Potentially Significant Impact. The proposed project would be subject to and would comply with, at a minimum, the 2019 California Building Code Title 24 (24 CCR, Part 6). Though the proposed Project

would implement energy efficiency components, the Draft EIR will analyze whether it would conflict or obstruct applicable state or local plans related to renewable energy. Further analysis of this topic will be provided in the Draft EIR.

VII. GEOLOGY AND SOILS

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

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

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

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

Potentially Significant Impact. The Project site is not located within a designated Alquist-Priolo Fault Zone. The closest Alquist-Priolo Fault Zone is along the Hollywood Fault, approximately 3.48 miles north of the Project site, as shown on Figure 12, Alquist-Priolo Fault Zones. The Project site is not within a Fault Rupture Study Area in the City's General Plan Safety Element.[37] However, the City's ZIMAS database identifies the site as located within a Fault Zone (Upper Elysian Park)[38]. A previous Geotechnical Engineering Investigation prepared by Geotechnologies, Inc. for the Project site states that there may be two unnamed faults cutting across the Project site; however, their locations are doubtful, other geological maps do not show these faults, and previous soil borings taken on-site do not indicate evidence of faulting.[39] An updated Geotechnical Engineering Investigation will be prepared for the Project, which will evaluate the potential for rupture of a known earthquake fault on the Project site. These potential impacts will be analyzed further in the Draft EIR.

[37] City of Los Angeles, General Plan Safety Element, Exhibit A, Fault Rupture Study Area (November 1996).

[38] City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), Parcel Profile Report: 541-401-6002, http://zimas.lacity.org/documents/zoneinfo/ZI2129.pdf, generated September 11, 2019.

[39] Geotechnologies, Inc, *Geotechnical Engineering Investigation, Proposed Mixed Use T.O.D. Development, Cornfield Site, 1251 North Spring Street, Los Angeles California* (Glendale, CA: Geotechnologies, July 2015).

ii. Strong seismic ground shaking?

Potentially Significant Impact. The primary seismic hazard on the Project site, as with all of Southern California, is ground shaking due to the presence of major active faults. The California Department of Conservation, California Geological Survey identifies the Project site as located within a Liquefaction Zone.[40] The City's ZIMAS database identifies the site as located within a Fault Zone (Upper Elysian Park), and within a Liquefaction area. The design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures erected or to be erected within the City must comply with Chapter IX, Building Regulations, of the City of Los Angeles Municipal Code. Compliance with the City's Building Code would ensure the structural stability of the proposed Project. This would require design and construction of proposed structures and infrastructure to account for ground shaking hazards through adherence to the seismic design criteria in the California Building Code. An updated Geotechnical Engineering Investigation will be prepared for the Project, which will evaluate the potential impacts of strong seismic ground shaking on the Project site. These potential impacts will be analyzed further in the Draft EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. The Project is located within a Liquefaction Zone as identified by the California Department of Conservation[41] and the City of Los Angeles General Plan, Safety Element Exhibit B, Areas Susceptible to Liquefaction, which identifies the Project site as "Liquefiable Areas" (recent alluvial deposits; groundwater less than 30 feet deep). Liquefaction refers to a process by which water-saturated granular soils transform from a solid to a liquid state during strong ground shaking. Liquefaction usually occurs during or shortly after a large earthquake. The movement of saturated soils during seismic events from ground shaking can result in soil instability and possible structural damage, and the Project site is within a liquefaction hazard zone. A Geotechnical Engineering Investigation will be prepared for the Project, which will evaluate the potential impacts of liquefaction on the Project site. These potential impacts will be analyzed further in the Draft EIR.

iv. Landslides?

Potentially Significant Impact. The Project site is not located adjacent to a mapped landslide and is not identified as being within a Landslide Inventory and Hillside Area in the City's General Plan Safety Element Exhibit C. On-site elevations at the South Parcel range from approximately 330 feet above mean sea level (amsl) on North Broadway to 291 feet amsl at the Metro L Line tracks. On-site elevations at the North Parcel range from 348 feet amsl on North Broadway to 301 feet amsl at the Metro L Line tracks. There are slopes at the Project site, some of which are proposed to be removed as part of the Project. An updated Geotechnical Engineering Investigation will be prepared for the proposed Project, which will evaluate the potential

[40] California Geologic Survey. *Earthquake Zones of Required Investigation,* Accessed April 15, 2020, https://maps.conservation.ca.gov/cgs/EQZApp/app/

[41] California Geologic Survey. *Earthquake Zones of Required Investigation,* Accessed April 15, 2020, https://maps.conservation.ca.gov/cgs/EQZApp/app/

impacts of landslides on the Project site. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. Grading and excavation activities associated with the proposed Project would result in the disruption of on-site soils and the exposure of uncovered soils to potential erosion due wind, rain, and surface water runoff during the construction phases. Under existing conditions, although the finished grade varies along both parcels, the existing grade along the southern property line of the Project Site generally slopes downward from west to east in the South Parcel, and east to west in the North Parcel. The existing grade of the Metro rail corridor, located between the South and North Parcel, ranges from approximately 30 feet to 40 feet North American Vertical Datum of 1988 (NAVD88) below the North Broadway street level[42]. The anticipated excavation depths associated with the Project would vary due to the existing conditions of the Project Site with continuous grade change. On the South Parcel, where the existing grade ranges between approximately 329 feet (NAVD88) and approximately 291 feet NAVD88, maximum excavation depth will be approximately to 38 feet NAVD88 (i.e., 41 feet below the elevation of North Broadway). On the North Parcel, where the existing grade ranges between approximately 343 feet NAVD88 and approximately 302 feet NAVD88, maximum excavation depth will be approximately to 41 feet NAVD88 (i.e., 35 feet below the elevation of North Broadway).

The Project would be required to implement erosion-control measures, in compliance with applicable regulations. During construction, erosion-control measures would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the Project. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document (PRD) with the State Water Resources Control Board (SWRCB) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ, NPDES No. CAS000002), referred to as the Construction General Permit, or the latest approved general permit. This permit is required for earthwork that result in the disturbance of one acre or more of total land area. The required SWPPP will mandate the implementation of Best Management Practices (BMPs) to reduce or eliminate construction-related pollutants in the runoff, including sediment. Additionally, the LAMC includes requirements for erosion control during construction and demolition activities. An updated Geotechnical Engineering Investigation will be prepared for the Project, which will evaluate the potential impacts of soil erosion on the Project site. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The Project would be exposed to local geologic hazards, and proposed grading and excavation activities associated with the Project would change the local geology. The soil and geologic characteristics of the Project site will be discussed further in the Draft

[42] North American Vertical Datum of 1988 (NAVD88) is the vertical datum for orthometric heights established for vertical control surveying in the United States of America based upon the General Adjustment of the North American Datum of 1988.

EIR and be based on the findings of the Geotechnical Engineering Investigation for the Project, which includes recommendations for preventing hazards associated with landslides, lateral spreading, subsidence, liquefaction and collapse. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The Project's on-site geological materials, which include alluvium and bedrock, are in the very low expansion index range; therefore, substantial risks to life or property are not anticipated. However, an updated Geotechnical Engineering Investigation will be prepared for the Project, which will evaluate the potential impacts of expansive soils on the Project site. These potential impacts will be analyzed further in the Draft EIR.

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

No Impact. The Project would be connected to the municipal sewer system and does not propose the use of septic tanks or other on-site wastewater treatment systems. Therefore, there would be no impact related to soils incapable of adequately supporting the use of on-site wastewater treatment systems. No further analysis of this topic will be provided in the Draft EIR.

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

Potentially Significant Impact. The Project site is a developed area and has been subject to previous excavation activities for existing structures and site improvements. However, excavation into underlying native soils (i.e., non-artificial geologic materials) through trenching, excavation, and grading for three parking levels has the potential to encounter unknown paleontological resources. A cultural resources study will be conducted as part of the Draft EIR to determine whether the Project site has potential to contain paleontological resources. These potential impacts will be analyzed further in the Draft EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Potentially Significant Impact. Construction and operation of the Project would generate greenhouse gas (GHG) emissions that have the potential to directly or indirectly have a significant impact on the environment. GHG emissions from the Project will be addressed and quantified in the Draft EIR. Potential impacts related to GHGs will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The proposed Project would result in construction and operational activities that would generate GHGs. In addition, the Project would increase the resident population, households, and employees at the Project site. Project consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHG (e.g., Assembly Bill 32, City of Los Angeles Green Building Code, and Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy) will be analyzed in the Draft EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

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

Potentially Significant Impact. Grading and construction activities would involve the transport, storage, use, and disposal of hazardous materials such as paint, solvents, oil, grease, and fuel for construction equipment. Based on the age of the structures, there is a potential for hazardous building materials (e.g., asbestos-containing materials and lead-based paint) to be present. Transportation and disposal of the existing on-site building materials could cause a release of such materials to the environment if they are present in existing buildings.

Currently, the Project site contains buildings associated with Metro's maintenance operations, which would be removed with Project implementation. The Project site's previous uses include a gas station on the North Parcel and an automobile repair shop, both of which have been removed, as well as oil and gas wells, as identified by CalGEM Well Finder. The Project site is located in an area designated as the "methane zone" and is subject to Division 71 of Article 1, Chapter IX of the LAMC. A Phase I Environmental Site Assessment (ESA) and Methane Assessment Report will be prepared for the Project, which will identify all previous uses of the Project site and any associated potential on-site hazards, and will include mitigation measures, if necessary.

The Project consists of residential and commercial uses, and these uses typically do not generate hazardous emissions, nor do they involve the routine use, transport, or disposal of hazardous materials in quantities that may pose hazards to the public. Hazardous materials used on-site for long-term operations would consist of common commercial cleansers, solvents, paints, pesticides, fertilizers, and other maintenance and janitorial materials. These materials are not considered acutely hazardous and are used routinely throughout urban environments for operation of commercial businesses. Handling, storage, and disposal of these hazardous materials would comply with all federal, state, and local requirements. The potential for the Project's construction and long-term operational activities to create a significant hazard through the routine transport, use, or disposal of hazardous materials will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The Project site is currently used for vehicle and equipment storage and as a construction staging/bus parking area. Existing hazardous materials at the Project site will be identified through the Phase I ESA. The Project site has also been identified to have two plugged/inactive oil wells on-site.[43] In addition, the southern portion of the site is located within the City's designated Methane Zone and Methane Buffer Zone.[44] The Methane Assessment Report will include the results of onsite testing to determine if there are hazards that may be posed by methane to future residents, visitors, and employees at the Project site. The findings of the studies regarding hazardous materials, oil wells, and methane levels will be discussed in the Draft EIR.

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

Potentially Significant Impact. Cathedral High School is located approximately 180 feet west of the Project site across North Broadway. During the Project's construction phases, the contractor is expected to comply with existing regulations, and there would be a limited risk of accidental release of hazardous emissions and hazardous materials (e.g., gasoline, oil, or other fluids) associated with the use and maintenance of construction equipment. However, construction activities associated with the handling of potential onsite hazards (e.g. abandonment of oil wells), could result in hazardous emissions or require the handling of hazardous materials, substances, or waste.

The long-term operation and occupancy of the proposed commercial and residential uses would involve the transport, use, storage, and disposal of various hazardous materials, such as paint, solvents, pesticides, fertilizers, and other maintenance and cleaning products. However, these hazardous materials would be in limited quantities and would be used, stored, disposed of, and transported in accordance with applicable federal, state, and local regulations. The operations of the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. California Government Code Section 65962.5 requires that information regarding environmental impacts of hazardous substances and wastes be maintained and provided at least annually to the Secretary for Environmental Protection. Commonly referred to as the Cortese List, this information must include the following: sites impacted by hazardous wastes, public drinking water wells that contain detectable levels of contamination, underground storage tanks with unauthorized releases, solid waste disposal facilities from which there is

[43] California Energy Management Division (CalGEM), Well Finder, Accessed April 15, 2020, Available: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.23349/34.06904/16

[44] City of Los Angeles, Methane and Methane Buffer Zones (Los Angeles, CA: March 2004).

migration of hazardous wastes, and all cease and desist and cleanup and abatement orders. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

- List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) Envirostor database (Health and Safety Codes 25220, 25242, 25356, and 116395);
- List of Leaking Underground Storage Tank (LUST) Sites by County and Fiscal Year from the State Water Resources Control Board (Water Board) GeoTracker database (Health and Safety Code 25295);
- List of solid waste disposal sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273 subdivision (e) and California Code of Regulations Title 14 Section 18051));
- List of "active" Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the Water Board (Water Code Sections 13301 and 13304); and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

Past uses of the Project site include a former gas station (1322 North Broadway) on the North Parcel. A full analysis of previous uses of the Project site and the Project's potential to create a significant hazard to the public or the environment will be analyzed further in the Draft EIR.

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

Less Than Significant Impact. There is no public airport or airport planning area located within two miles of the Project site. The two nearest airports to the Project site are the San Gabriel Airport in El Monte and the Bob Hope Airport in Burbank, both located approximately 11 miles from the Project site. The Project site is outside the Airport Influence Area for these airports.[45] Because the Project would involve construction of buildings over 200 feet in height, Federal Aviation Administration (FAA) notification would be required per the Code of Federal Regulations, Title 14, Part 77. This would be done by completing the Notice of Proposed Construction or Alteration form (FAA Form 7460-1). The FAA would then conduct a review of the proposed Project to determine whether there is a hazard to air navigation and would formally notify the City and/or Project Applicant of its findings. The FAA may require markings and lighting to enhance air safety and would also require a supplemental notice (FAA Form 7460-2) to notify the FAA in advance of Project construction. Compliance with the FAA notification process and any requirements that the FAA issues in response would ensure that no impacts to air safety would occur. As such, potential impacts related to airport hazards would be less than significant through compliance with FAA regulatory mandates, and no mitigation is required. No further analysis of this topic will be provided in the Draft EIR.

[45] ALUC, *Los Angeles County Airport Land Use Plan* (Los Angeles, CA: ALUC, December 2004).

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

Less Than Significant Impact. The City's General Plan Safety Element identifies North Spring Street, which provides access to the South Parcel and connects Alameda Street and North Broadway, as the nearest Selected Disaster Route. Other identified nearby critical disaster transportation routes include the SR-110, I-101, I-5, and I-10.[46] Disaster routes function as primary thoroughfares for the movement of emergency response traffic and access to critical facilities. Construction activities may result in temporary lane obstruction along North Broadway during landscaping and sidewalk construction and during any cross-walk construction. A Worksite Traffic Control Plan would be prepared pursuant to LADOT requirements, which would identify appropriate requirements from the WATCH Manual and current California Manual on Uniform Traffic Control Devices (MUTCD) requirements for traffic control. Typical worksite traffic control requirements during construction may include, but are not limited to, appropriate traffic-control devices to ensure public safety; City approval for any lane or sidewalk closures; adequate signage and striping for lane closures; flaggers with stop/slow paddles to manage traffic; installation of signage for tow/away and no stopping zones; coordination with residences and businesses regarding driveway access; and maintenance of pedestrian access that is compliant with the Americans with Disabilities Act (ADA).

Long-term operation and occupancy of the proposed Project would also increase the volume of traffic on local and regional roadway networks, which serve as emergency response and evacuation routes. However, the Project would be required to design, construct, and maintain structures, roadways, and facilities to provide adequate access in compliance with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans, including all Los Angeles Fire Department Requirements for access and safety. Therefore, impacts on emergency response and evacuation would be less than significant. No further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. The City's General Plan Safety Element does not identify the Project site as being within a wildfire hazard area or urban fire/secondary hazard area,[47] but it does identify the Project site as located within the urban fire and secondary hazards area for "industrialized areas"; the notes state that "industrial zones are used to represent industrialized areas. Industrialized areas can be correlated with greater risk of public exposure to atmospheric releases of hazardous materials and flammable or explosive materials." However, the Project site would not be developed with industrial uses and is proposing a General Plan Amendment and Zone Change to reflect the proposed residential and commercial uses for the site. Additionally, the Los Angeles State Historic Park separates the Project site from the industrial and warehouse

[46] City of Los Angeles, General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems (November 1996).

[47] City of Los Angeles, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas (November 1996).

land uses further to the south and west. There are no wildland areas within this urbanized portion of Los Angeles.

Electrical transmission lines are identified as being adjacent to the northernmost portion of the North Parcel and the Los Angeles State Historic Park. However, the presence of nearby transmission lines, which are common throughout urbanized areas and constructed and maintained in accordance with federal and state regulations, would not result in indirectly expose people or structures to a significant risk of loss, injury or death involving wildland fires. Additionally, the Project site is not identified as being within a Very High Fire Hazard Severity Zone (VHFHSZ).[48]

The proposed Project would be designed in compliance with all applicable LAMC requirements related to Fire Department access, materials, fire flows, and development standards. Therefore, the proposed Project would not result in significant risk of loss, injury or death involving wildfire hazards. No further analysis of this topic will be provided in the Draft EIR.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

[48] City of Los Angeles Fire Department Fire Zone Map. https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed September 13, 2019.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i. Result in substantial erosion or siltation on- or off-site; ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. Impede or redirect flood flows?	☒	☐	☐	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

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

Potentially Significant Impact. Demolition, grading, and excavation activities associated with construction of the proposed Project would result in the potential for pollutants to enter stormwater runoff. The Applicant would be required to submit a Notice of Intent to the Los Angeles Regional Water Quality Control Board (LARWQCB) in order to obtain approval to complete construction activities under the Construction General Permit. This permit includes a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction phase impacts related to stormwater (and some non-stormwater) discharges. Permit requirements include the preparation of a SWPPP, implementation and monitoring of

BMPs, implementation of best available technology for toxic and non-conventional pollutants, implementation of best conventional technology for conventional pollutants, and periodic submittal of performance summaries and reports to the LARWQCB. The requirements of the NPDES Construction General Permit for preparation of an SWPPP and identification of temporary construction-phase BMPs that would be implemented by the Project to reduce stormwater pollutants will be addressed in the Draft EIR.

Additionally, although not anticipated, dewatering activities may be required. If subsurface water is encountered, dewatering would be conducted in compliance with the Waste Discharge Requirements and General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles And Ventura Counties, as administered by the SWRCB. The Project site is known to include plugged/inactive oil wells. As such, construction activities would require the abandonment of these wells, which must be conducted in accordance with the procedures mandated by the CalGEM.

Long-term changes in storm-water quality due to operation of the proposed Project would occur due to the replacement of the vehicle and equipment storage and construction staging/bus parking areas with the proposed residential and commercial uses and parking structures. The Project includes permanent BMPs to reduce long-term storm-water pollution, in accordance with the City's Low Impact Development (LID) Ordinance. The City's LID Ordinance requires the use of LID standards and practices in development projects to encourage the beneficial use of rainwater and urban runoff, reduce urban runoff while improving water quality and groundwater recharge, reduce erosion and hydrologic impacts downstream, and enhance recreational and aesthetic values in Los Angeles.[49]

As stated in the City's 2016 Planning and Land Development Handbook for Low Impact Development, all new projects must select, design and maintain LID and hydromodification control BMPs to address pollutants that are likely to be generated, reduce changes to pre-development hydrology, assure long-term function, and avoid the breeding of vectors. The proposed Project will be required to develop a LID Plan that demonstrates how stormwater runoff will be infiltrated, evapotranspired, captured and used, and/or treated through on-site BMPs and stormwater management techniques. The on-site stormwater management techniques must be properly sized, at a minimum, to infiltrate, evapotranspire, store for use, and/or treat stormwater through a high removal efficiency biofiltration/biotreatment system to the maximum extent feasible, without any runoff leaving the site and for at least the volume of water produced by the stormwater quality design storm event.

Additionally, the City's Stormwater and Urban Runoff Pollution Control[50] (LAMC Section 64.70) meets the requirements of the Municipal Separate Storm Sewer System (MS4) Permit and

[49] City of Los Angeles, Planning and Land Development Handbook for Low Impact Development, https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, accessed September 13, 2019.

[50] City of Los Angeles, Stormwater and Urban Runoff Pollution Control, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-162590#JD_C6A4.4.

prohibits the discharge of any stormwater that could interfere with the operation of, or cause any damage to the storm drain system, or impair the beneficial use of the receiving waters.

A water resources report will be prepared to assess potential impacts related to water quality standards or waste discharge requirements or other potential impacts to surface or ground water quality. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The Project site is not used as a groundwater recharge area and the Project will not rely on groundwater wells for water supplies. The proposed Project would convert areas of currently unpaved pervious surfaces into paved/non-pervious surfaces, which would affect the amount of stormwater infiltration on the Project site. The Project would be required to comply with the City's Low Impact Development (LID) Ordinance, which requires on-site infiltration of stormwater flows. The Draft EIR will assess potential impacts related to groundwater supplies and recharge and the potential for impeding sustainable groundwater management of the basin. These potential impacts will be analyzed further in the Draft EIR.

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

i. Result in substantial erosion or siltation on- or off-site;

Potentially Significant Impact. The Project would require the demolition of all on-site structures and the grading/excavation of soils to accommodate the parking and buildings' footings, which would substantially alter the current Project site drainage patterns. The Project site does not contain any site drainages, creeks, or streams. As previously discussed, during construction, erosion-control measures would be implemented as part of the SWPPP for the Project, consistent with the requirements of the NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ, NPDES No. CAS000002), referred to as the Construction General Permit, or the latest approved general permit.

In the long term, the Project would result in the creation of impervious surfaces over those currently existing on the Project site, which would reduce the potential for long-term erosion or siltation at off-site areas. There are several storm drain inlets at the Project site, and the Project area is served by underground storm drainage facilities that discharge into the concrete-lined Los Angeles River (located 0.1 to 0.5 mile east of the site). The Draft EIR will assess impacts related to the potential for substantial erosion or siltation due to changes in the existing drainage patterns of the site.

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

Potentially Significant Impact. The Project would change drainage patterns on the Project site and would have the potential to increase runoff volumes and rates due to the increase in impervious surfaces at the Project site. The majority of the Project site would be covered with buildings and paved areas, with some open space/vegetated and landscaped areas largely located in the central portion of the site. As discussed above, the proposed Project must select, design and maintain LID and hydromodification control BMPs to reduce changes to pre-development hydrology and assure long-term function of the BMPs. The proposed Project will be required to develop a LID Plan that demonstrates how on-site BMPs would be properly sized to infiltrate, evapotranspire, store for use, and/or treat stormwater runoff without any stormwater runoff leaving the site, to the maximum extent feasible, for at least the volume of water produced by the stormwater quality design storm event. Stormwater runoff from the Project site would be directed into underground storm drain lines that ultimately connect to the Los Angeles River. The Draft EIR will assess impacts related to the potential for substantial flooding due to changes in the rate or amount of runoff from the Project site.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Potentially Significant Impact. The Project would change drainage patterns on the Project site and would be required to reduce pollutants entering the stormwater through construction-phase BMPs in accordance with the NPDES Construction General Permit and through permanent BMPs in accordance with the City's LID Ordinance. The capacity of existing storm drainage systems to accommodate runoff from the Project site, and the potential generation of stormwater pollutants by the Project will be analyzed further in the Draft EIR.

iv. Impede or redirect flood flows?

No Impact. The Project site is located with the designation of "Zone X" by the Federal Emergency Management Agency (FEMA), which denotes an "area of minimal flood hazard". The nearest flood hazard zone is the adjacent Los Angeles River located to the east of the Project site.[51] The Project site does not contain any site drainages, creeks, or streams. As such, the proposed Project would not substantially alter the existing drainage pattern of the site such that proposed structures would impede or redirect flood flows. No further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. The Project Site is not located within a designated 100-year floodplain and there are no large bodies of water located near the Project site that may lead to flooding at the site in the event of a seiche. The Project site is located approximately 14.5 miles

[51] FEMA, *Flood Insurance Rate Map – Map Number 06037C1628F* (Washington, D.C.: FEMA, August 2008).

inland from the Pacific Ocean and would not be affected by a tsunami (sea wave) and is not located within a designated tsunami hazard area.[52] The North Parcel of the Project site is included within a Potential Inundation Area, as identified on the City's General Plan Safety Element Exhibit G, which relates to the potential for inundation due to water storage facility failures (e.g. dams and reservoirs). The likelihood of dam or reservoir failure is remote. The lowest level (P-3) of the Project site would be developed only with parking garage and if flooded, would not result in significant risks related to release of pollutants. Additionally, the Project site is not located within a designated 100-year floodplain. Therefore, impacts related to inundation by seiche or tsunami would not occur, and the potential for impacts due to inundation that would result in a risk release of pollutants would be less than significant. No further analysis of this topic will be provided in the Draft EIR.

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

Potentially Significant Impact. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties is the Water Quality Control Plan (WQMP) for the Los Angeles Region, which includes the City of Los Angeles. The Basin Plan: (i) identifies beneficial uses for surface and ground waters, (ii) includes the narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan.[53] The proposed Project requires excavations and construction activities to prepare the site for development. It is possible that contaminated soils could be encountered during construction activities and excavation, transport, or disposal of site soils could expose nearby lands to runoff of hazardous materials. The Project's potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan will be analyzed further in the Draft EIR.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

[52] City of Los Angeles, General Plan Safety Element, Exhibit G, Inundation and Tsunami Hazard Area (November 1996).

[53] RWQCB, *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html (Los Angeles, CA: RWQCB, June 2019).

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

a. Physically divide an established community?

No Impact. The Project site is located in an urbanized area characterized by a mix of land uses. The Project site runs adjacent to an existing commercial corridor along North Broadway and is located between existing commercial and residential uses and the Gold Line tracks. The Project is proposing a mix of residential and neighborhood-serving retail uses, which would serve as a point of commerce and activity. The Project also includes landscaping, lighting, and pedestrian components intended to activate the extended frontage of the Project Site along Broadway and adjacent to the Metro L Line station. Development of the Project site would not remove or impede any existing connecting corridors or walkways or otherwise limit connectivity in the surrounding community. Furthermore, the Project is providing publicly accessible open space. Therefore, the Project would not physically divide an established community. No further analysis of this topic will be provided in the Draft EIR.

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

Potentially Significant Impact. The Project requires several entitlement approvals, including: a General Plan Amendment from Light Industrial to Regional Commercial; Zone Change from MR2 to C2; Height District change from Height District 1 to Height District 2D; a Zoning Administrator approval for building height exceeding transitional height requirements in LAMC Section 12.21.1.A.10; a Zoning Administrator Adjustment to setback requirements; approval of Site Plan Review; a Vesting Tentative Tract Map that involves the dedication of a three-foot-wide strip along North Broadway to the City and subdivision of the site; and approval of a Development Agreement. The Draft EIR will discuss the entitlements and address Project consistency with the goals, objectives, and policies of the City's General Plan, Central City North Community Plan, Zoning Code, and other applicable land use policies and programs. Further analysis of this topic will be provided in the Draft EIR. Additionally, as discussed in Section III, above, the Project site is within 1,000 feet of the SR-110 and therefore requires the preparation of a site-specific HRA. The HRA would identify air quality levels at Project site based upon variables such as location, distance to the freeway, and prevailing wind patterns. The HRA would disclose any potential health risks to future residents or occupants that may result from the Project. Further analysis of this topic will be provided in the Draft EIR.

XII. MINERAL RESOURCES

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

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

Less Than Significant Impact. The California Department of Conservation's Information Warehouse: Mineral Land Classification map and associated Surface Mining and Reclamation Act (SMARA) show that the Project site is located within MRZ-3 (see Appendix C, Mineral Land Classification Map), which is an area containing mineral deposits the significance of which cannot be evaluated from available data. Urban development generally is incompatible with potential extraction of minerals and/or mining facilities, and the Project site is located within an urbanized area that has been previously disturbed by development. Furthermore, the Project site is not located within a designated Oil Drilling/Surface Mining Supplemental Use District.

According to the City's Safety Element of the General Plan, the Project site is adjacent to the Los Angeles City Oil Field[54]. This oil field became active in the 1890s and is approximately one square mile in area, reaching from Koreatown in the west to an area between Dodger Stadium and Downtown in the east.[55] According to CalGEM, the Project site contains two plugged/abandoned oil wells in the North Parcel (Ventura Oil Company, American Petroleum Institute number (API) #0403716588 and Chevron, API #0403700510), which are not within the Los Angeles City Oil Field. API #0403716588 is a plugged well that was never a producing well, was considered to be a "dry hole," and was abandoned in 1957[56]. API #0403700510 was abandoned in 1967 and was drilled for geological information and was not anticipated to be completed as an oil or gas well.[57]

54 City of Los Angeles, General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas Area (November 1996).

55 Library of Congress, The Los Angeles Oil Boom Through Maps. Accessed July 3, 2020. https://blogs.loc.gov/maps/2019/07/the-los-angeles-oil-boom-through-maps/

56 CalGEM, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.81567/34.08505/9 (Sacramento, CA: CalGEM, January 2020).

57 CalGEM, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.81567/34.08505/9 (Sacramento, CA: CalGEM, January 2020).

The Project site was not a contributing component of the Los Angeles Oil Field, either historically or currently, and does not contribute to the availability of known mineral resources. Due to the urbanized nature of the Project site and its surroundings, as well as the absence of known, significant mineral resources as mapped by the state, Project implementation would not result in loss of availability of a known mineral resource of value to the region and residents of the state. No further analysis of this topic will be provided in the Draft EIR.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Less Than Significant Impact. Refer to Threshold XII(a) above. The Project site is located near the Los Angeles Oil Field, which is generally located west of the Project site. However, the wells within the Los Angeles Oil Field in the vicinity of the Project site are not in active production. Thus, the Project would not result in the loss of locally important mineral resources, as associated with aggregate materials on and near the Los Angeles River, or oil and gas resources associated with the Los Angeles Oil Field. Because the Project site contains inactive oil wells, the Applicant must consult with CalGEM to confirm that the wells have been adequately abandoned. However, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, as the wells were not productive, are no longer active, and do not currently and have not historically contributed to important mineral resource recovery. No further analysis of this topic will be provided in the Draft EIR.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

Potentially Significant Impact. Noise from the proposed Project would occur during short-term construction due to construction vehicular traffic, demolition, excavation, grading, and building construction associated with on-site heavy equipment and excavation of soils required for the parking. Noise would also be generated by the long-term occupancy and operation of the Project. Specifically, long-term operation and occupancy of residential and commercial land uses proposed at the Project site could increase the ambient noise levels above existing conditions due to the introduction of stationary noise sources and activities on the Project site and the associated increase in traffic volumes on local roadways. The Project would increase the potential for long-term and permanent increases in noise levels on and near the Project site. A noise analysis will be prepared to address potential noise impacts from the Project, and compliance with the City's noise standards in the General Plan and the noise regulations in Chapter XI of the Los Angeles Municipal Code. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The proposed Project would generate groundborne vibration during short-term construction due to the use of heavy equipment for demolition and excavation. There are vibration-sensitive land uses adjacent to the Project site, including residential, church and commercial uses, as well as the adjacent historic Capitol Milling Building. Short-term vibration would be higher than existing levels in the Project area but would cease upon completion of construction. Long-term groundborne noise and vibration impacts associated with increased traffic on nearby roadways could also occur. These potential impacts related to groundborne vibration will be analyzed further in the Draft EIR.

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

No Impact. There is no public airport or public use airport located within two miles of the Project site. The two nearest airports to the Project site are the San Gabriel Airport in El Monte and the Bob Hope Airport in Burbank, both located approximately 11 miles from of the Project site. The Project site is not located within an airport land use plan or within two miles of an airport. Therefore, the Project would not be exposed to excessive noise levels from airport operations. There are no private airstrips located on or near the Project site. Therefore, the Project would not be exposed to excessive noise levels from private airstrip operations. No further analysis of this topic will be provided in the Draft EIR.

XIV. POPULATION AND HOUSING

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

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

Potentially Significant Impact. The proposed Project would introduce a maximum of 986 du and 38,800 sf of neighborhood-serving retail/restaurant uses, which would lead to an increase in resident population, as well as in visitors, patrons, and employees at the proposed commercial uses and common areas. Potential impacts associated with the increase in residents and employees on the Project site will be analyzed further in the Draft EIR.

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

No Impact. The Project site is not currently developed with housing units. Development of the proposed Project would not result in the displacement of any existing housing or people and would not necessitate a need for the construction of replacement housing elsewhere. No impacts associated with the displacement of existing housing units would occur with the Project. No further analysis of this topic will be provided in the Draft EIR.

XV. PUBLIC SERVICES

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

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

a. Fire protection?

Potentially Significant Impact. Fire protection services are provided to the Project site by the City of Los Angeles Fire Department. The Project site is served by Fire Station 1, located at 2230 Pasadena Avenue, approximately 0.6-mile west of the Project site. With development of the Project introducing various multi-story commercial and residential uses, there would be an associated increase in demand for fire protection and emergency medical services. These potential impacts will be analyzed further in the Draft EIR.

b. Police protection?

Potentially Significant Impact. Police protection services are provided to the Project site by the Los Angeles Police Department. The Project site is within the service area of the Central Community Police Station located at 251 E. 6th Street, approximately 0.75-mile southwest of the Project site. Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased

demand for police protection services. In addition, with the introduction of various commercial and residential uses on-site and the increase in the number of people (e.g., residents, employees, visitors, patrons) who would be at the Project site, there would be an increased potential for crime and accidents, resulting in an increase in demand for police protection and law enforcement services. These potential impacts will be analyzed further in the Draft EIR.

c. Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project Site is located within two Local Districts –East Area and Central Area.[58] The nearest schools to the Project Site are Cathedral High School, located approximately 175 feet north of the Project site at 1253 Bishops Road, and Solano Avenue Elementary School, located approximately 0.19 miles to the north of the Project site at 615 Solano Avenue, and Ann Street Elementary School, located approximately 0.34-mile south of the Project site, at 126 East Bloom Street. Cathedral High School is a private school and therefore not a part of the LAUSD. The nearest public high school to the Project site, within the jurisdiction of the LAUSD, is Belmont High School, located approximately 1.5 miles southeast of the Project site. The following LAUSD schools currently serve the Project site (school names and grades are incorporated)[59]:

- Castelar Street Elementary, (K–5)
    - Castelar Street Elementary Two-Way Immersion Mandarin
- Solano Avenue Elementary, (K-6)
- Florence Nightingale Middle School, (6–8)
- Belmont High School Zone of Choice (9–12):
    - Miguel Contreras Learning Complex (Academic Leadership Community)
    - Miguel Contreras Learning Complex (Business and Tourism)
    - Miguel Contreras Learning Complex (LA School of Global Studies)
    - Miguel Contreras Learning Complex (School of Social Justice)
- Ramon C. Cortines School of Visual and Preforming Arts (9-12)
- Belmont Senior High School (9-12)
- Edward R. Roybal Learning Center (9-12)
- Woodrow Wilson Senior High (9-12)
- Abraham Lincoln Senior High (9-12)

The Project would construct up to 986 du and would introduce approximately 132 employees to the Project site. As shown in Table 5, Project Estimated Student Generation, the Project could potentially increase the local student population by approximately 444 new students.

[58] LAUSD, Local District Map, (Los Angeles, CA: LAUSD), https://achieve.lausd.net/domain/34, (June 2015).

[59] LAUSD, Resident School Finder for 1251 N Spring St, Los Angeles, CA, 900122019 (Los Angeles, CA: LAUSD). Accessed on August 18, 2020. http://rsi.lausd.net/ResidentSchoolIdentifier/

Table 5: Estimated Number Of Students Generated By The Project

Proposed Land Use	Development Intensity	Elementary School Students	Middle School Students	High School Students	Total Students
Residential Uses					
Multi-family residential	986 units	224	60	128	412
Commercial and Employment-Generating Uses					
Commercial uses; building support	132 employees	17	5	10	32
				Total	444

Source: Los Angeles Unified School District's 2020 Developer Fee Justification Study

Note: For residential uses, the following student generation rates were used: 0.2269 elementary students per household, 0.0611 middle school students per household, and 0.1296 high school students per household. For non-residential uses, the LAUSD Developer Fee Justification Study provides a generation factor of 0.2354 students per employee. For non-residential uses, the LAUSD Developer Fee Justification Study does not specify which grade levels students would fall within for non-residential land uses. As such, the students generated by the non-residential uses are assumed to be divided amount the elementary, middle, and high school levels at the same distribution ratio observed for the residential generation factors, which is approximately 54 percent elementary school, 15 percent middle school, and 31 percent high school.

To reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for LAUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Pursuant to Senate Bill (SB) 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law. Thus, the proposed Project would not result in the need for new or altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the Draft EIR.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks (RAP) and the California Department of Parks and Recreation. The closest parks and recreational facilities to the Project site include the Los Angeles State Historic Park, Elysian Park, and the Radio Hill Gardens. Table 6 lists parks located within one mile of the Project site.

Table 6: Public Parks Within One Mile Of The Project Site

Facility	Address	Approximate Size (Acres)	Approximate Distance from Site (miles)
Alpine Park and Recreation Center	817 Yale St., Los Angeles, CA 90012	1.8	0.3
City Hall Park	200 North Main St., Los Angeles, CA 90012	1.7	0.9
Dodger Stadium Buena Vista Meadow Picnic Area, Buena Vista View Area, Elysian Park View Name[1]	East side of Dodger Stadium at 1000 Vin Scully Ave. Los Angeles, CA 90012	56.1	adjacent
Downey Playground and Recreation Center and Downey Pool	1772 and 1775 N. Spring St., Los Angeles, CA 90031	2.3	0.2
Egret Park	Riverside Dr., Los Angeles, California 90031	0.1	0.8
Elysian Park	929 Academy Rd., Los Angeles, CA 90012	557.6	117 feet
Everett Park	Everett St. One Block North of Sunset, Echo Park, CA 90026	0.5	0.8
Grand Park	200 N. Grand Ave., Los Angeles, CA 90012	6.4	0.8
Lacy Street Neighborhood Park	Ave. 26 and Lacy St., (Next to the Pasadena Freeway) Los Angeles, CA 90031	0.4	0.8
Lilac Terrace Park	1254 W. Lilac Terrace, Los Angeles, CA 90012	2.8	0.9
Lincoln Heights Recreation Center	2303 Workman St., Los Angeles, CA 90031	1.6	0.7
Los Angeles Plaza Park (Father Serra Park)	125 Paseo De La Plaza, Los Angeles, CA 90012	.08	0.6
Los Angeles River Center and Gardens	570 W Ave. 26, Los Angeles, CA 90065	6.7	0.9
Los Angeles State Historic Park	1245 N. Spring St., Los Angeles, CA 90012	33.3	adjacent
Oso Park	Riverside Dr. and Oros St., Los Angeles, California 90031	0.2	0.9
Radio Hill Gardens[1]	835 Elysian Park Ave., Los Angeles, CA 90012	23.2	117 feet
Source: Google Earth 2020[60] ; LADRP 2019[61]; City of Los Angeles 2020[62]. Notes: [1]Facilities are a part of Elysian Park and therefore acreage is also included in Elysian Park acreage.			

The Project would construct up to 986 du and would increase the residential population within the Project area; therefore, the proposed Project would increase demand for public parkland based on the standard minimum parkland to-population ratio identified by the City. Consistent with LAMC 12.21 G.2, the Project would be required to provide approximately 54,050 sf of open space in the

60 Google Earth Pro. City of Los Angeles. Accessed August 18, 2020.

61 Los Angeles Department of Recreation and Parks (LADRP). 2019 Facility Map Locator. (Los Angeles, CA: LADRP). Accessed October 17, 2019. http://www.laparks.org/maplocator?cat_id=All&geo[radius]=10.

62 City of Los Angeles Department of City Planning, Zoning Information and Mapping Access System (ZIMAS), http://zimas.lacity.org/, Accessed August 18, 2020.

South Parcel and approximately 34,225 sf of open space in the North Parcel. Per LAMC 12.21 G.2(a)(iv), 50 percent of the total required open space, or 27,025 sf within the South Parcel and 17,113 sf within the North Parcel, must be common open space. As shown in Table 4, Project Open Space, the proposed Project would provide a total of approximately 58,325 sf of open space on the South Parcel and 51,486 sf on the North Parcel, for a total of 109,811 square feet of open space. The Project includes 101,590 sf of common open space. More specifically, the Project would provide approximately 56,399 sf of common open space within the South Parcel and 45,191 sf of common open space within the North Parcel.

The Project would result in an increase in the use of existing parks and recreational facilities. However, this impact may be reduced to a less than significant level through the required payment of the Park Fee or Quimby Fee to the City for the construction of a residential development. Monies collected as part of the Park Fee are placed in an in-lieu account and used exclusively for the acquisition and development of park and recreational sites and facilities. Based on the amount of open space provided by the Project and the payment of fees, the Project would not result in the substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the Draft EIR.

e. Other public facilities?

Potentially Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, 64 neighborhood branch libraries, as well as through Web-based resources. Administratively, the LAPL is divided into six geographic regions, which include the Central/Southern, Northeast, East Valley, West Valley, Hollywood, and Western Regions. The Project site is located in the LAPL's Northeast Area, which contains one regional branch library (Arroyo Seco) and 12 neighborhood branch libraries.[63] The introduction of residential uses on the Project site and its associated residents would generate a demand for library services. These potential impacts will be analyzed in the Draft EIR.

XVI. RECREATION

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

[63] LAPL, Library Directory, http://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf, (October 22, 2019, access date).

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

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

Less Than Significant Impact. As discussed above under Threshold XV(d) Parks, the proposed Project would require approximately 54,050 sf of open space in the South Parcel and approximately 34,225 sf of open space in the North Parcel. Per LAMC 12.21 G.2(a)(iv), 50 percent of the total required open space, or 27,025 sf within the South Parcel and 17,113 sf within the North Parcel, must be common open space. As shown in Table 4, Project Open Space, the proposed Project would provide a total of approximately 58,325 sf of open space on the South Parcel and 51,486 sf on the North Parcel, for a total of 101,590 sf of open space. The Project includes 101,590 sf of common open space. More specifically, the Project would provide approximately 56,399 sf of common open space within the South Parcel and 45,191 sf of common open space within the North Parcel.

The Project would result in an increase in the use of existing parks and recreational facilities. However, this impact would be reduced to a less than significant level through the required payment of the Quimby Fee or Park Fee to the City for the construction of a residential development. Monies collected as part of the Park Fee are placed in an in-lieu account and used exclusively for the acquisition and development of park and recreational sites and facilities. Based on the amount of open space provided by the Project and the payment of fees, the Project would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. As discussed under Threshold XV(d) Parks, the proposed Project would include swimming pools, indoor lounges, recreational facilities, and rooftop decks. These facilities would be located within the development footprint assumed for the Project. Additionally, the Project would provide adequate open space per LAMC 12.21 G.2(a)(iv). Therefore, any physical effects associated with construction of these facilities would be evaluated throughout the Draft EIR and covered within the analysis of short-term impacts in Air Quality, Greenhouse Gas Emissions, Noise, and Transportation. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☒	☐	☐	☐

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

Potentially Significant Impact. The proposed Project would increase the volumes of traffic on local roads and regional freeways and would increase the number of daily and peak hour vehicle trips to, from, and within the Project site in comparison to current levels. These increases would occur during short-term construction and long-term operation. The Project also includes improvements on North Broadway, including the dedication of a three-foot-wide strip along the Project site for a widened sidewalk/parkway area and a pedestrian crosswalk at the northern end of the Project site. A Traffic Impact Analysis will be prepared for the Project to determine the potential traffic impacts. The Project has the potential to conflict with an applicable plan,

ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. The proposed Project's consistency with CEQA Guidelines Section 15064.3(b) will be determined using the City's Transportation Assessment Guidelines, which requires Applicants to analyze and assess potential impacts or deficiencies to the circulation system generated by Project implementation, and to identify feasible measure to offset any impacts. Because the proposed Project would exceed the City's screening criteria and would generate more than 250 daily vehicle trips, an estimation of the Project's Vehicle Miles Traveled (VMT) will be conducted and appropriate transportation demand management (TDM) strategies would be employed, if required. Potential impacts related to consistency with CEQA Guidelines Section 15064.3(b) will be analyzed in the Draft EIR.

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

Less Than Significant Impact. As discussed previously, the proposed Project would involve the expansion of the public right-of-way on North Broadway and the creation of new driveways on North Broadway. The proposed roadway and driveway improvements would be constructed in accordance with City standards for minimum widths and curves, sight distance, clearances, and other factors and would be subject to review and approval by the City's Departments of Building and Safety, Fire Department, and Public Works. The Project does not propose any roadway or bridge construction or realignment, or otherwise alter existing roadway structures that could involve incompatible uses. Therefore, impacts related to traffic hazards would be less than significant. No further analysis of this topic will be provided in the Draft EIR.

d. Result in inadequate emergency access?

Potentially Significant Impact. The Project would require the construction of new site access points and driveways for parking garages and at-grade access for emergency vehicles, as well as temporary street closures during construction activities. As discussed previously under Threshold XVII(c), roadway and driveway improvements would be subject to review and approval by the City's Departments of Building and Safety and Public Works. Access by emergency vehicles and evacuation routes would also be reviewed by the City's Fire Department. The proposed Project would be developed in compliance with the Fire Department's emergency access requirements. Additionally, the Project requires the preparation of a Worksite Traffic Control Plan pursuant to LADOT, which would identify appropriate requirements from the WATCH Manual and current California Manual on Uniform Traffic Control Devices (MUTCD) requirements for traffic control during construction. Potential impacts related to the inadequate emergency access will be analyzed in the Draft EIR.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☒	☐	☐	☐
(i). Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
(ii). A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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

California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Potentially Significant Impact. The City will consult with local tribes in accordance with Assembly Bill (AB) 52 and the Draft EIR will include a detailed timeline of the consultation process. The City must provide notice to tribes that are affiliated with the geographic area of the proposed Project site if the tribe has submitted a written request to be notified. The Project would require excavation and export of on-site soils to accommodate the parking structures; therefore, the potential exists to uncover tribal cultural resources. The findings of the tribal cultural resources report that will be completed for the Project, as they may relate to local tribes and tribal resources, will be summarized in the Draft EIR to evaluate potential direct and indirect impacts on tribal cultural resources. The results of the consultation process will also be summarized into the Draft EIR to evaluate direct and indirect impacts on tribal cultural resources. These potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. See response to Threshold XVIII(a)(i) above. The findings of the tribal cultural resources study and the results of the AB 52 consultation process will evaluate potential impacts to significant tribal cultural resources. These potential impacts will be analyzed further in the Draft EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Potentially Significant Impact. The proposed Project is anticipated to increase the demand for water and increase the generation of wastewater from the site, and would require new

connections to existing water, wastewater, storm drain, electrical, natural gas, and telecommunication facilities. The capacity of the existing utility infrastructure will be discussed in the Draft EIR, based on the existing and proposed utility infrastructure plans and the Water Supply Assessment that will be prepared for the Project. This will include the available capacity of the existing area and any needed upgrades to off-site facilities. The capacity of these systems and utilities to accommodate the proposed Project will be evaluated in the Draft EIR.

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

Potentially Significant Impact. The proposed Project would develop 986 dwelling units and 38,800 sf of retail/restaurant uses, which would generate an increased demand for potable water supplies. Therefore, the Project is required to assess the availability of water supplies in accordance with Senate Bill 610. A Water Supply Assessment (WSA) will be prepared to determine if the Los Angeles Department of Water and Power (LADWP) has adequate water supplies to serve the Project in consideration of the City's 2015 Urban Water Management Plan. This topic will be further evaluated in the Draft EIR.

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

Potentially Significant Impact. The City of Los Angeles Sanitation and Environment (LASAN) is responsible for planning, operation, and maintenance of the City's sewer collection system, and has the objectives of providing sufficient sewage capacity to accommodate current and future projected flows.[64] Wastewater generated by the Project would be conveyed and treated at the Hyperion Treatment Plant near El Segundo. The Project would increase wastewater generation from the Project site, and this wastewater would be similar in quality as those generated by multi-family residential and neighborhood retail and restaurant uses located near the site and in other areas of the City. The wastewater generated by the Project is not likely to require treatment that is not currently provided to existing wastewater flows in the Hyperion Treatment Plant or that exceeds the requirements of the Los Angeles Regional Water Quality Control Board. Potential impacts will be analyzed further in the Draft EIR.

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

Potentially Significant Impact. Demolition and construction activities at the Project site would generate solid wastes that would require disposal at area landfills. Occupancy and operation of the Project would also generate solid wastes requiring landfill disposal. An analysis of the proposed Project's impacts on the local landfill system will be provided in the Draft EIR, including an estimate of on-site waste generation and available capacities at landfills likely to be used by the Project construction and operation. These potential impacts will be analyzed further in the Draft EIR.

[64] City of Los Angeles, *Sewer System Management Plan*, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf.

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

Potentially Significant Impact. The proposed Project would increase solid waste generation at the Project site during construction and operation, and would be required to comply with applicable local, state, and federal solid-waste disposal requirements, including but not limited to the California Integrated Waste Management Act of 1989 (AB 939); state requirements for diversion of construction and demolition debris; the City's Solid Waste Integration Resources Plan (SWIRP), and other applicable diversion plans and goals. The proposed Project would conform to all applicable federal, state, and local management and reduction statutes and regulations related to solid waste. These potential impacts will be analyzed further in the Draft EIR.

XX. WILDFIRE

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

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

Less Than Significant Impact. The City's General Plan Safety Element identifies North Spring Street, which provides access to the South Parcel and connects Alameda Street and North Broadway, as the nearest Selected Disaster Route. Other identified nearby critical disaster transportation routes include the SR-110, I-101, I-5, and I-10. Disaster routes function as primary thoroughfares for the movement of emergency response traffic and access to critical facilities. Construction activities may result in temporary lane obstruction along North Broadway during landscaping and sidewalk construction and during any crosswalk construction. A Worksite Traffic Control Plan would be prepared pursuant to LADOT requirements, which would identify appropriate requirements from the WATCH Manual and current MUTCD requirements for traffic control. Typical worksite traffic control requirements during construction may include, but not be limited to, appropriate traffic-control devices to ensure public safety; City approval for any lane or sidewalk closures; adequate signage and striping for lane closures; flaggers with stop/slow paddles to manage traffic; installation of signage for tow/away and no stopping zones; coordination with residences and businesses regarding driveway access; and maintenance of pedestrian access that is compliant with the Americans with Disabilities Act (ADA).

Long-term operation and occupancy of the proposed Project would also increase the volume of traffic on local and regional roadway networks, which serve as emergency response and evacuation routes. However, the Project would be required to design, construct, and maintain structures, roadways, and facilities to provide adequate access in compliance with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans, including all Los Angeles Fire Department Requirements for access and safety. Therefore, impacts on emergency response and evacuation plans would be less than significant. No further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. As previously stated in the response to Threshold IX(g), the City's General Plan Safety Element does not identify the Project site as being within a wildfire hazard area, and the identification of the Project site as being within an urban fire/secondary hazard area

for “industrialized areas” would not be relevant after development of the Project with residential and commercial uses.[65] Additionally, the Project site is not identified as being within a VHFHSZ.[66] The Project would not develop land uses that could exacerbate wildfire hazards and the site is not located in a hillside area or adjacent to wildlands that are subject to wildfire hazards. The Project would comply with requirements related to Fire Department access, materials, fire flows, and development standards. Therefore, the proposed Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant, and no further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. The Project site is in an urbanized area within Los Angeles that is fully serviced with utility infrastructure. No new road, fuel breaks, or emergency water resources would be required for Project implementation. Therefore, the proposed Project would not exacerbate fire risks due to the installation of new infrastructure. Impacts would be less than significant, and no further analysis of this topic will be provided in the Draft EIR.

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

Less Than Significant Impact. As discussed above, the Project would not generate a wildfire or fire risk in the Project area. The Project site is not located within a landslide hazard area and would not have the potential to generate downstream flooding due to drainage changes. Therefore, the proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and no further analysis of this topic will be provided in the Draft EIR.

[65] City of Los Angeles, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas (December 1990).

[66] City of Los Angeles Fire Department Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed September 13, 2019.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Potentially Significant Impact. See responses to Thresholds IV(a) through IV(f) above, which state that the Project would not have potentially significant impacts on biological resources. Thus, the Project would not have the potential to substantially reduce the habitat of fish or wildlife species,

cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. However, responses to Thresholds V(a) through V(d) state that the Project may have potentially significant impacts on cultural resources that will be further analyzed in the Draft EIR, and responses to Thresholds XVIII(a)(i) and XVIII(a)(ii) above indicate a potential for significant impacts on tribal cultural resources. Potential impacts on Air Quality, Geology and Soils, GHG Emissions, and Hydrology and Water Quality would have the potential to degrade the quality of the environment. Because of the potential for significant adverse effects on these issues, a Draft EIR will be prepared for the Project.

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

Potentially Significant Impact. The Draft EIR will include an analysis of environmental impacts where the Project may contribute to significant environmental effects that are individually limited, but cumulatively considerable when evaluated in connection with past, present, and future projects. The EIR will include a cumulative impact analysis for each of the issues determined to be potentially significant within this Initial Study. Cumulative impacts associated with the issues determined to be below a level of significance within this Initial Study are discussed below.

With regard to cumulative effects for Aesthetics, the aesthetic impacts of the Project cannot be considered significant pursuant to SB 743 and the City's Zoning Information File ZI No. 2452. As such, the Project's cumulative aesthetic impact would not be significant. Regarding the issues of Agriculture and Forestry Resources, Biological Resources, and Mineral Resources, no such resources have been identified on the Project site such that significant impacts would occur from development of the Project. Therefore, redevelopment of the Project site would not contribute to any cumulative losses or removal of such resources in the Project area or region or combine with other projects to result in cumulatively considerable impacts to those resources. Regarding the topic of Wildfire, the Project site is not located within a VHFHSZ and is not located in a hillside area or adjacent to wildlands that are subject to wildfire hazards. Additionally, the Project would not develop land uses that could exacerbate wildfire hazards; therefore, the Project would not contribute to wildfire hazards in the area or region and, as such, would not result in cumulatively considerable impacts in the category of wildfire.

As with the Project, pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development, including cumulative projects. While the proposed Project would generate direct population growth and a demand for parks and recreational facilities, it would also provide on-site open space that would not only serve its residents but would also be available to the general public. The Project would also pay fees for the acquisition, development, and expansion of parks in the City. Cumulative projects that include a residential component would also provide on-site open space areas and would be required to pay City-required fees for park development. Therefore, the proposed Project would not create a significant demand for off-site parks and recreational facilities and it would not lead to significant cumulative impacts.

For these reasons, no cumulatively considerable impacts would occur in the categories of Aesthetics, Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Public Services (schools and parks), Recreation, or Wildfire, and no further analysis of these topics will be provided in the Draft EIR.

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

Potentially Significant Impact. The Project has the potential for significant impacts related to Air Quality; Cultural Resources, Energy, Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning; Noise; Population and Housing; Public Services (fire, police and libraries); Transportation; Tribal Cultural Resources, and Utilities and Service Systems, which may cause substantial adverse effects on human beings, either directly or indirectly. These potential effects will be analyzed in the Draft EIR.

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SOURCE: Esri and Digital Globe, Open Street Map 2019

0 405 810 Feet

FIGURE 1

Regional Location and Vicinity Map

Buena Vista Project Initial Study

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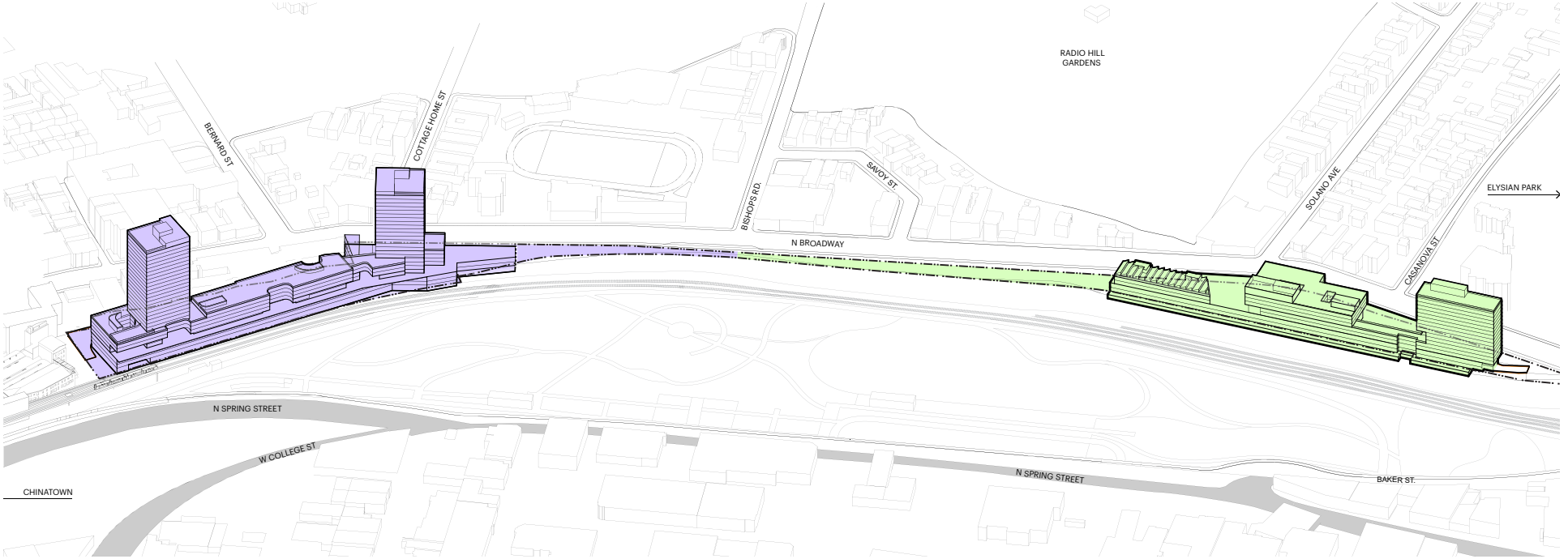

SOURCE: RCH Studios 2021

FIGURE 2

North and South Parcel Building Locations

Buena Vista Project Initial Study

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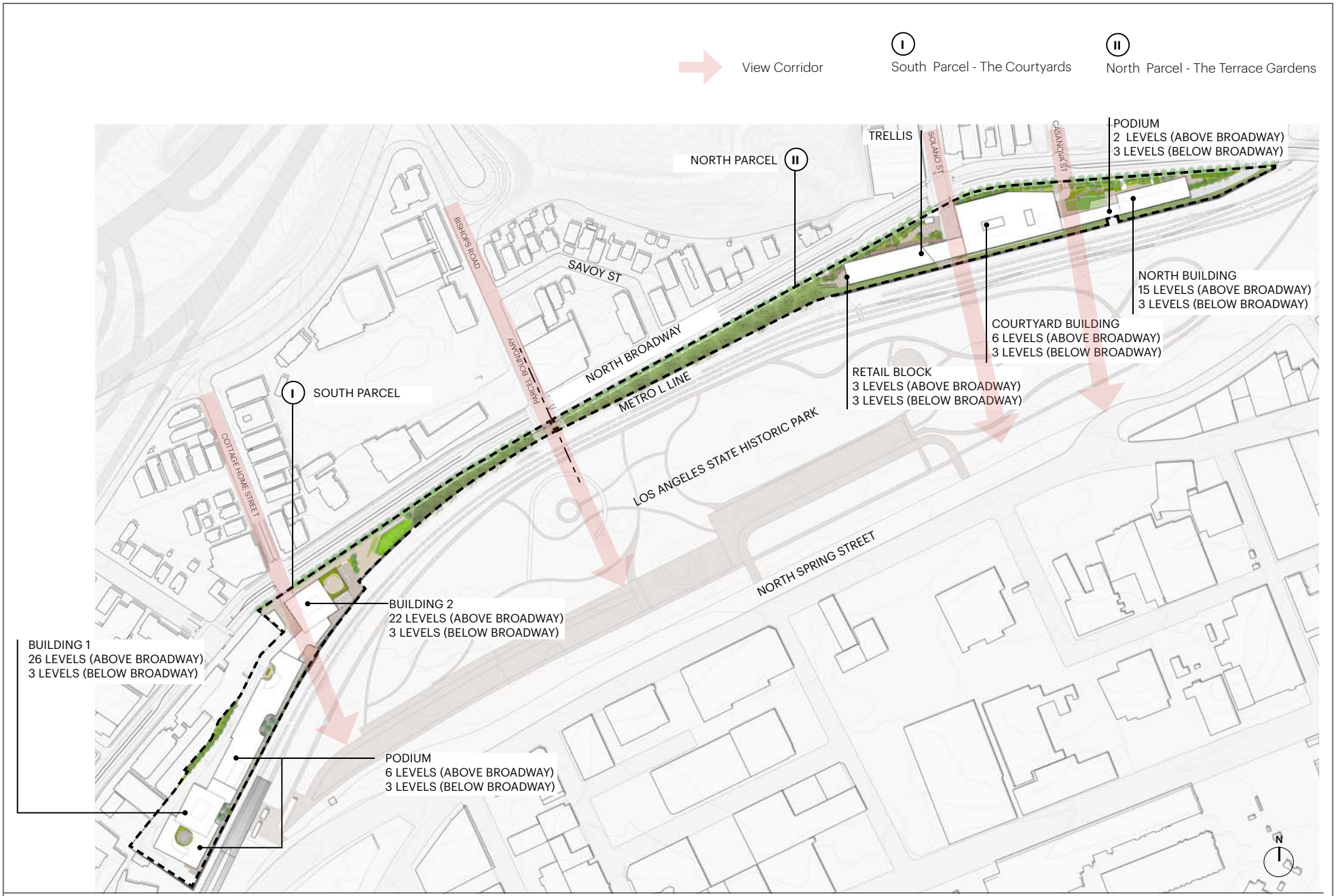

SOURCE: RCH Studios 2021

FIGURE 3

Conceptual Site Plan

Buena Vista Project Initial Study

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KEY

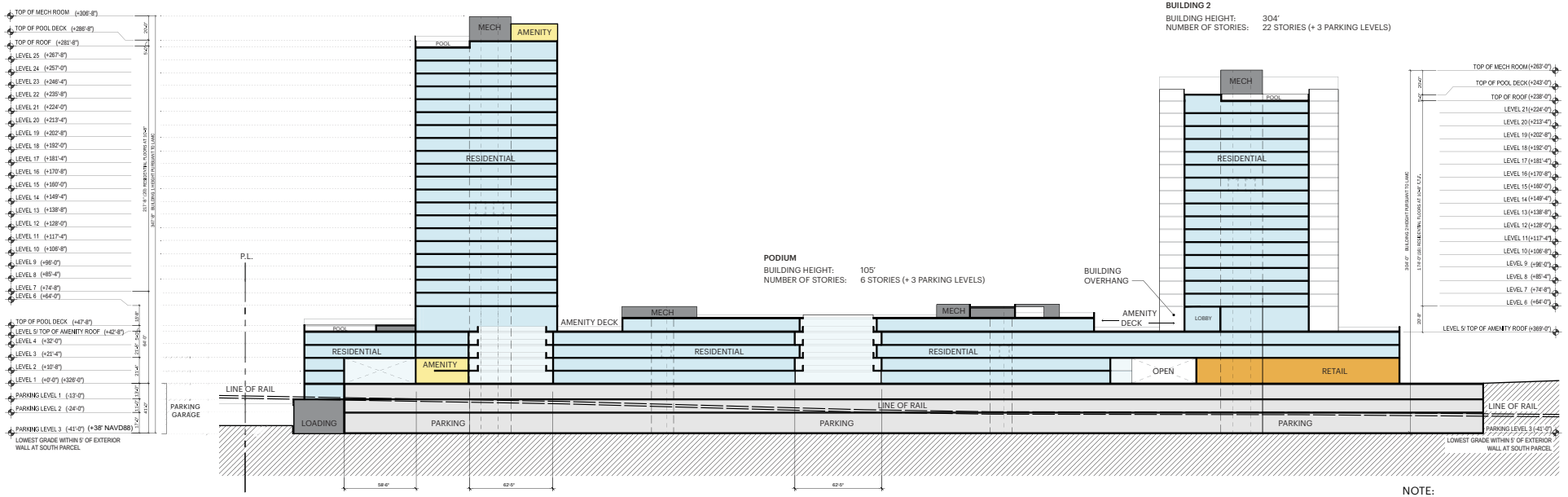
- RESIDENTIAL
- RETAIL
- AMENITY/ LOBBY
- PARKING
- SERVICE/ MECH RM

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

BUILDING 1
BUILDING HEIGHT: 347'-8"
NUMBER OF STORIES: 26 STORIES (+ 3 PARKING LEVELS)

BUILDING 2
BUILDING HEIGHT: 304'
NUMBER OF STORIES: 22 STORIES (+ 3 PARKING LEVELS)

PODIUM
BUILDING HEIGHT: 105'
NUMBER OF STORIES: 6 STORIES (+ 3 PARKING LEVELS)



NOTE:
+0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOME STREET

SOURCE: RCH Studios 2021

FIGURE 4
South Parcel – Cross-Section
Buena Vista Project Initial Study

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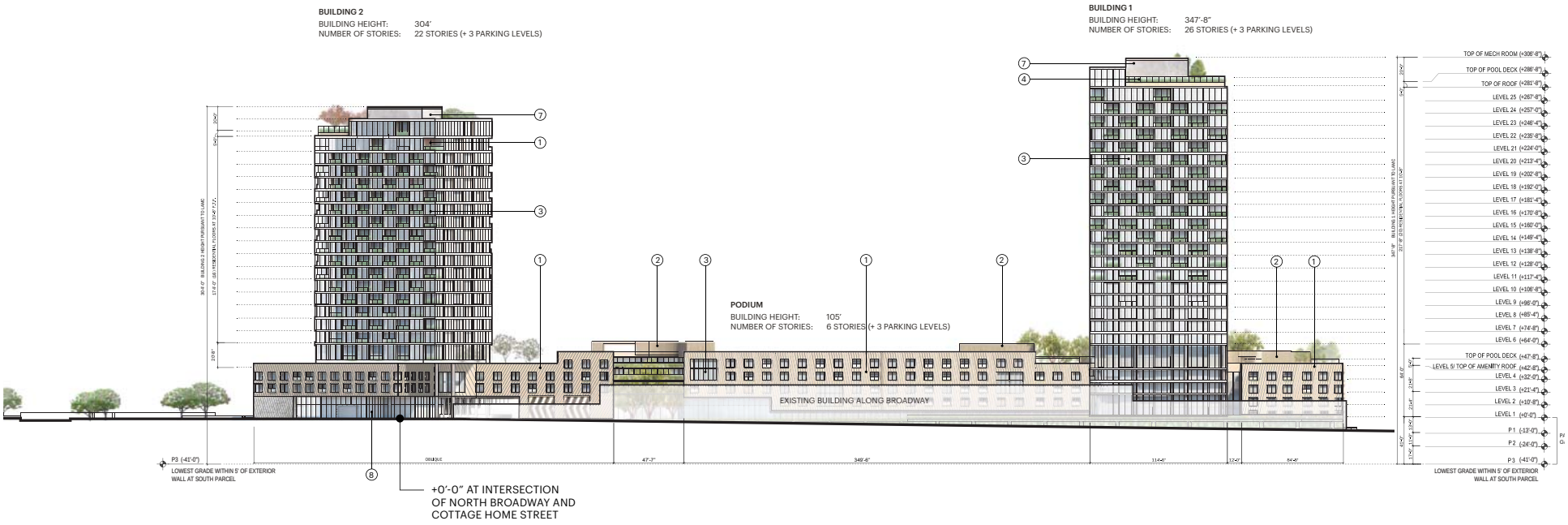
KEY

1. METAL PANEL 1
2. METAL PANEL 2
3. WINDOW WALL
4. GLASS/ STEEL GUARDRAIL
5. COLORED CONCRETE
6. CONCRETE PLANTER/ SEATING
7. CONCRETE
8. STOREFRONT GLAZING
9. WOOD DECKING
10. WOOD TRELLIS
11. FIBER CEMENT BOARD

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.



SOURCE: RCH Studios 2021

FIGURE 5A

South Parcel – Site Elevation from North Broadway

Buena Vista Project Initial Study

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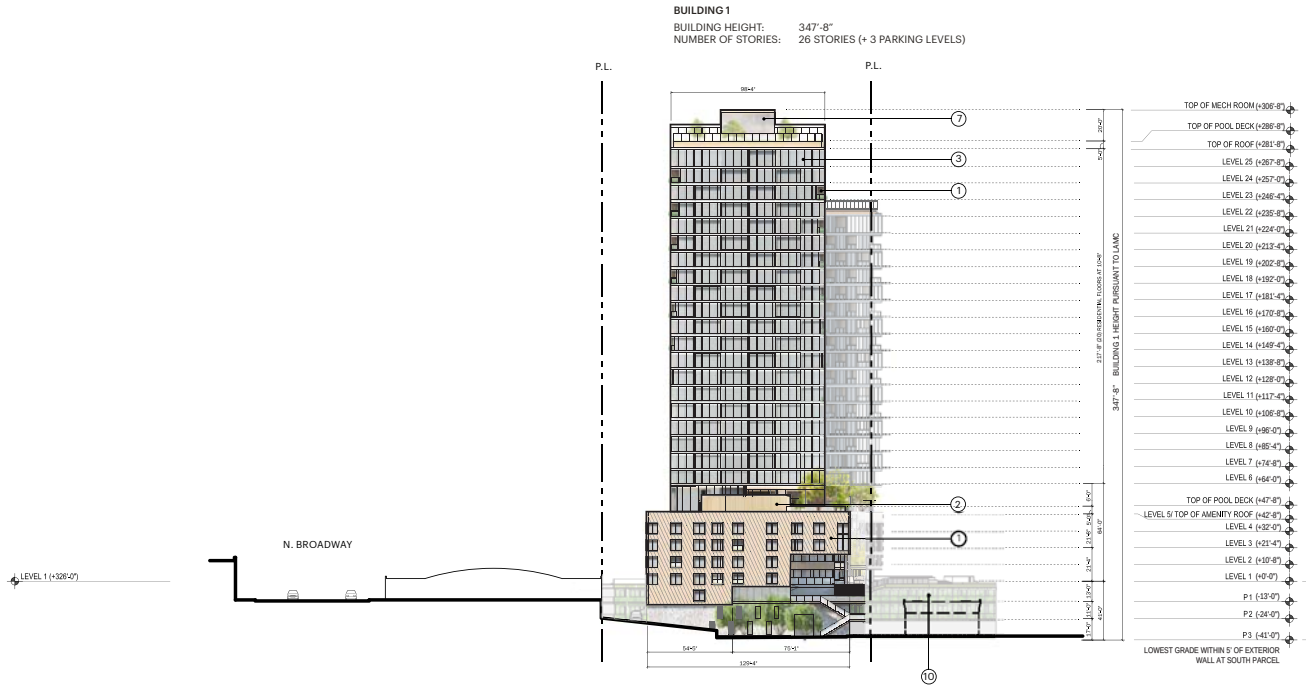
KEY

1. METAL PANEL 1
2. METAL PANEL 2
3. WINDOW WALL
4. GLASS/ STEEL GUARDRAIL
5. COLORED CONCRETE
6. CONCRETE PLANTER/ SEATING
7. CONCRETE
8. STOREFRONT GLAZING
9. WOOD DECKING
10. LANDSCAPED SCREEN WALL AT GARAGE
11. FIBER CEMENT BOARD

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.



NOTE:
+0'-0" AT INTERSECTION OF NORTH BROADWAY AND COTTAGE HOME STREET

SOURCE: RCH Studios 2021

FIGURE 5B

South Parcel – Site Elevation from the South

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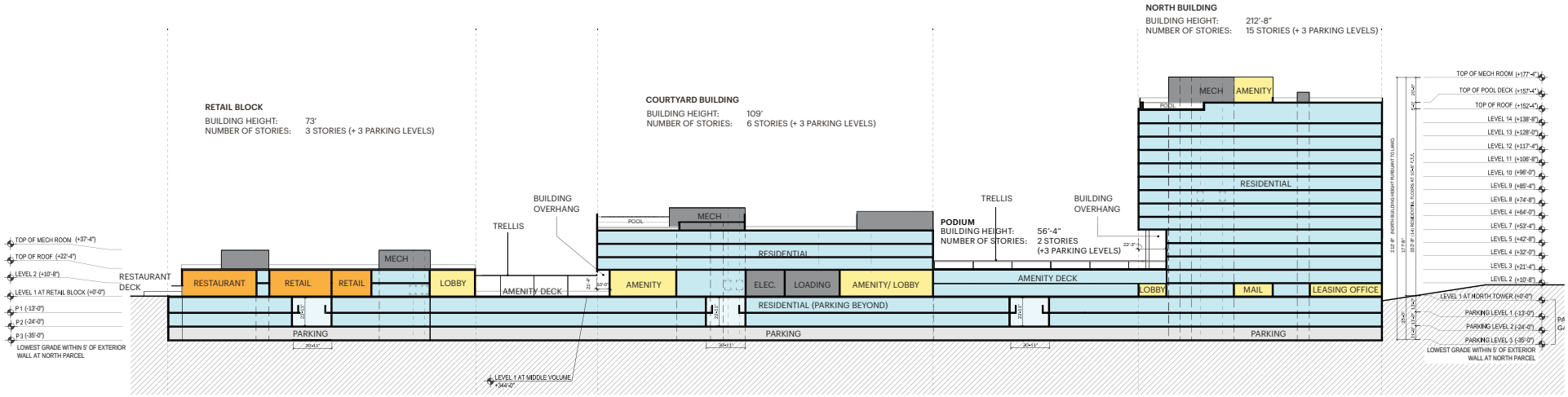
KEY

- RESIDENTIAL
- RETAIL
- AMENITY/ LOBBY
- PARKING
- SERVICE/ MECH RM

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.



SOURCE: RCH Studios 2021

FIGURE 6

North Parcel – Cross-Section

Buena Vista Project Initial Study

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KEY

1. METAL PANEL 1
2. METAL PANEL 2
3. WINDOW WALL
4. GLASS/ STEEL GUARDRAIL
5. COLORED CONCRETE
6. CONCRETE PLANTER/ SEATING
7. CONCRETE
8. STOREFRONT GLAZING
9. WOOD DECKING
10. WOOD TRELLIS
11. FIBER CEMENT BOARD

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

SOURCE: RCH Studios 2021

FIGURE 7A

North Parcel – Site Elevation from North Broadway

Buena Vista Project Initial Study

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KEY

1. METAL PANEL 1
2. METAL PANEL 2
3. WINDOW WALL
4. GLASS/ STEEL GUARDRAIL
5. COLORED CONCRETE
6. CONCRETE PLANTER/ SEATING
7. CONCRETE
8. STOREFRONT GLAZING
9. WOOD DECKING
10. WOOD TRELLIS
11. FIBER CEMENT BOARD

NOTE:
PER LAMC THE HEIGHT MEASUREMENT IS DETERMINED FROM THE LOWEST ELEVATION WITHIN 5' OF EXTERIOR WALL LINE OF THE BUILDING'S LOWEST POINT.

SOURCE: RCH Studios 2021

FIGURE 7B

North Parcel – Site Elevation from the East

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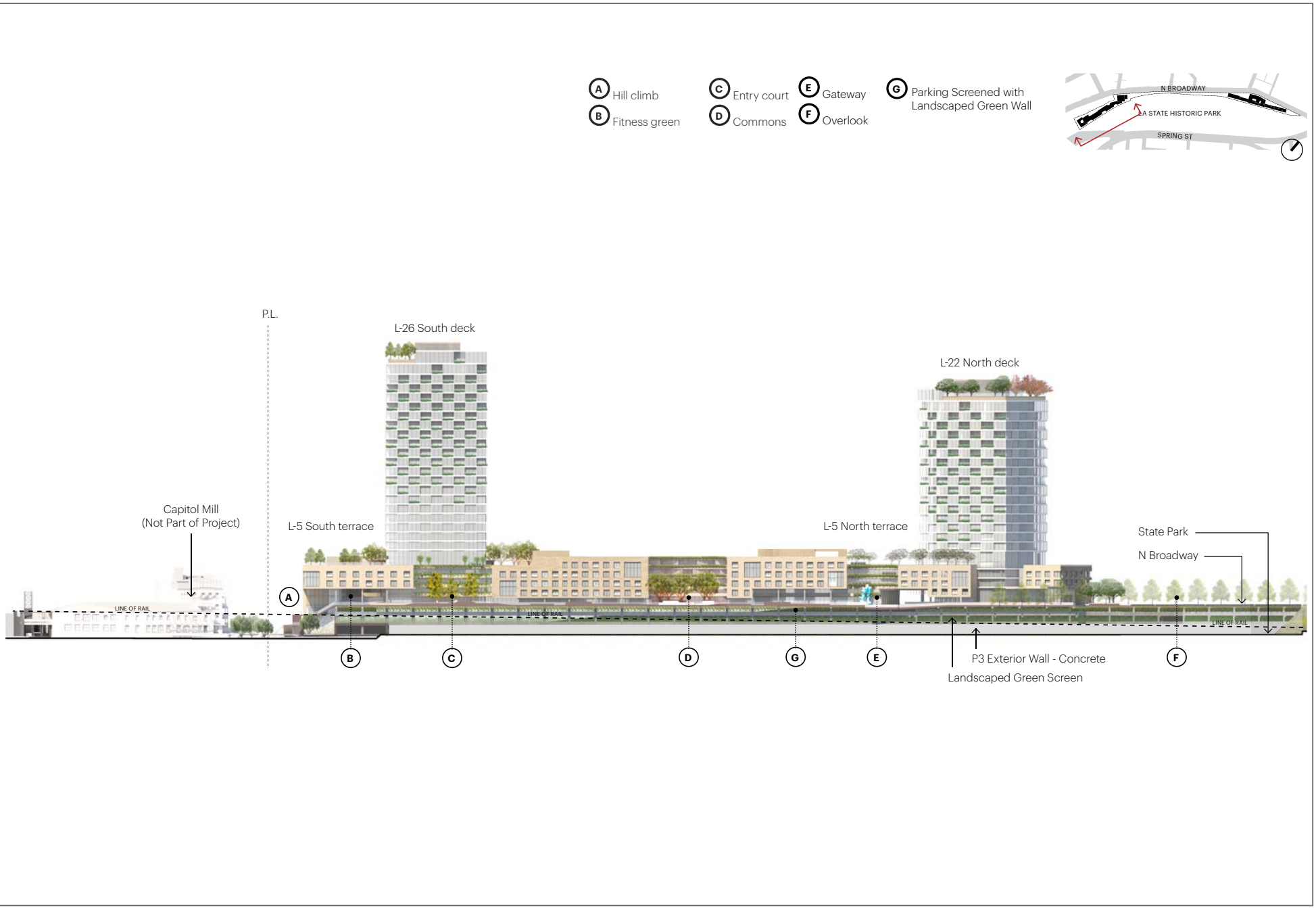

SOURCE: RCH Studios 2021

FIGURE 8A

South Parcel – Conceptual Landscaping Plan

Buena Vista Project Initial Study

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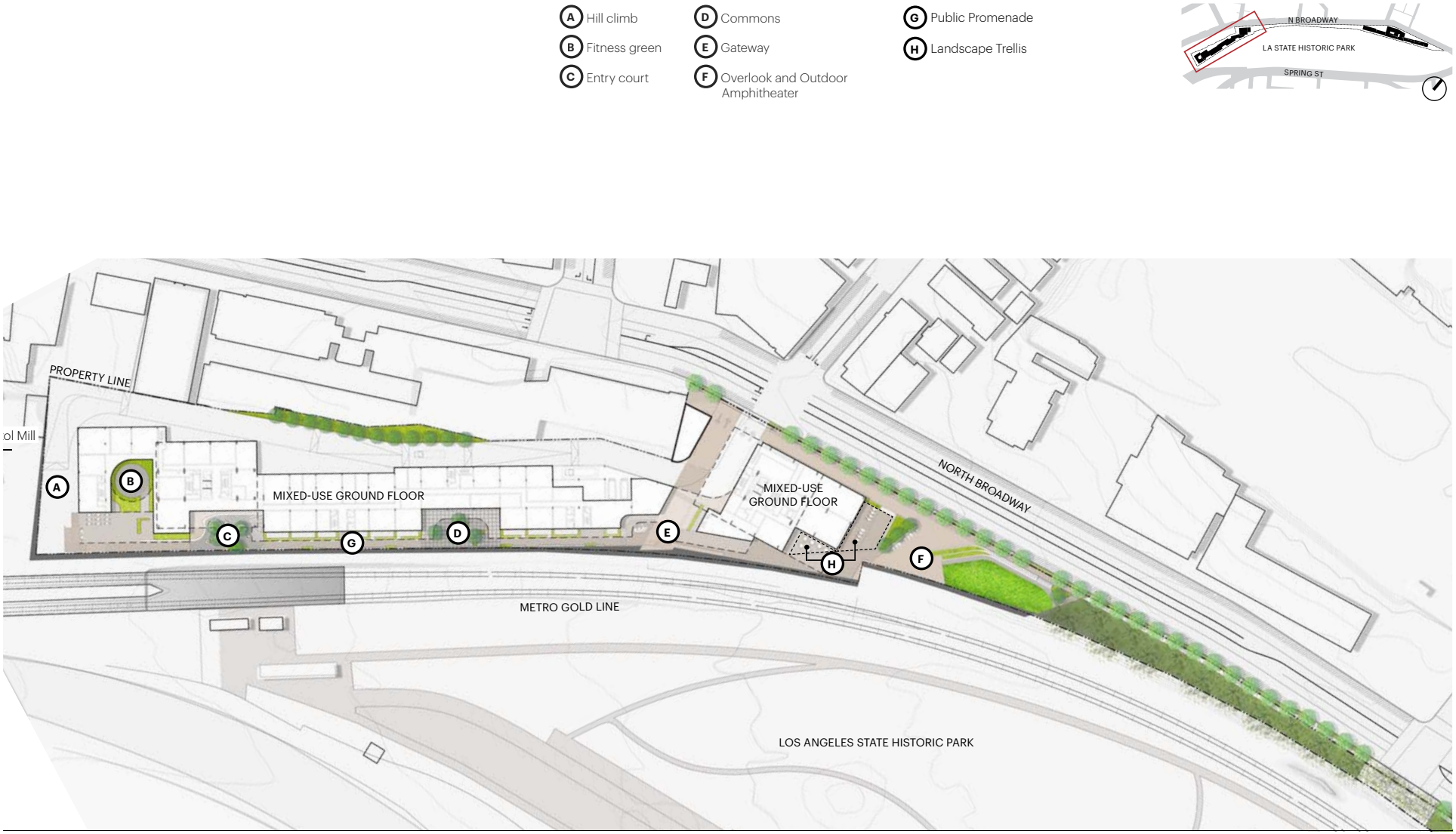

SOURCE: RCH Studios 2021

FIGURE 8B

South Parcel- Courtyards Landscaping

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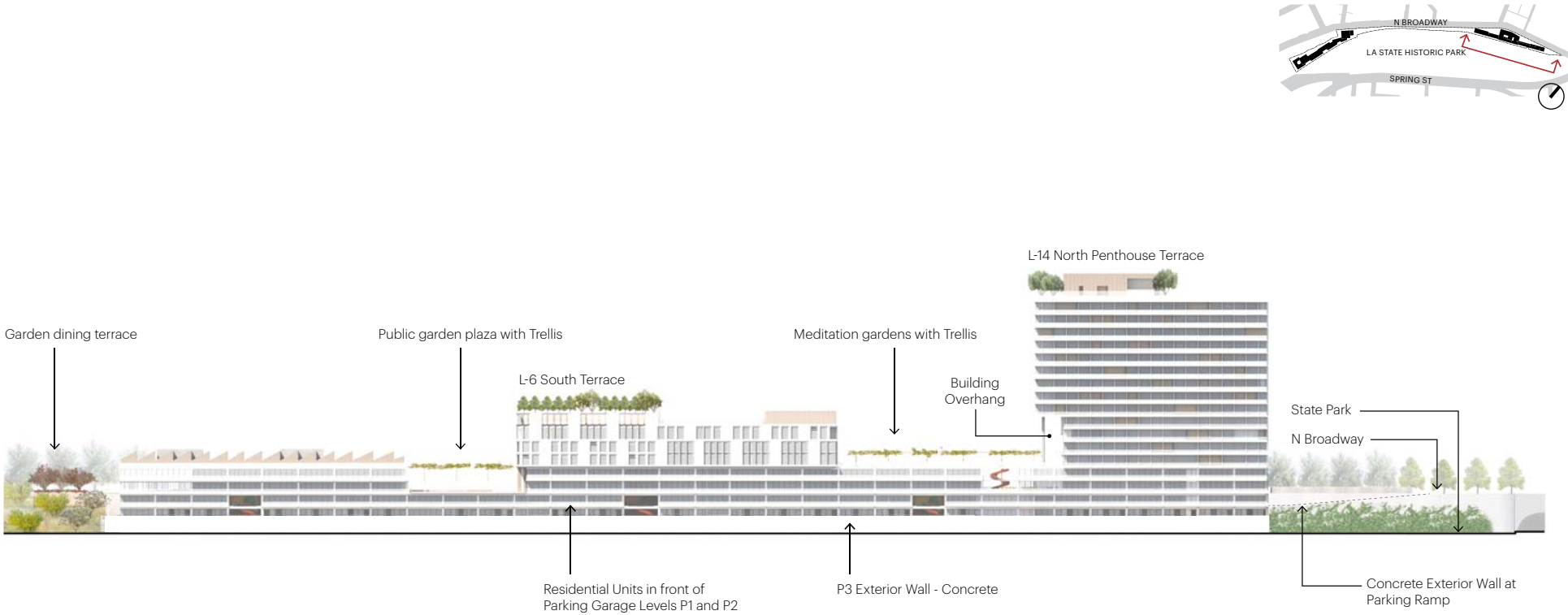

SOURCE: RCH Studios 2021

FIGURE 9A

North Parcel – Conceptual Landscaping Plan

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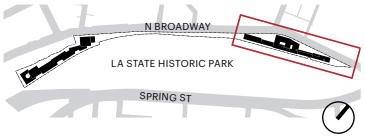
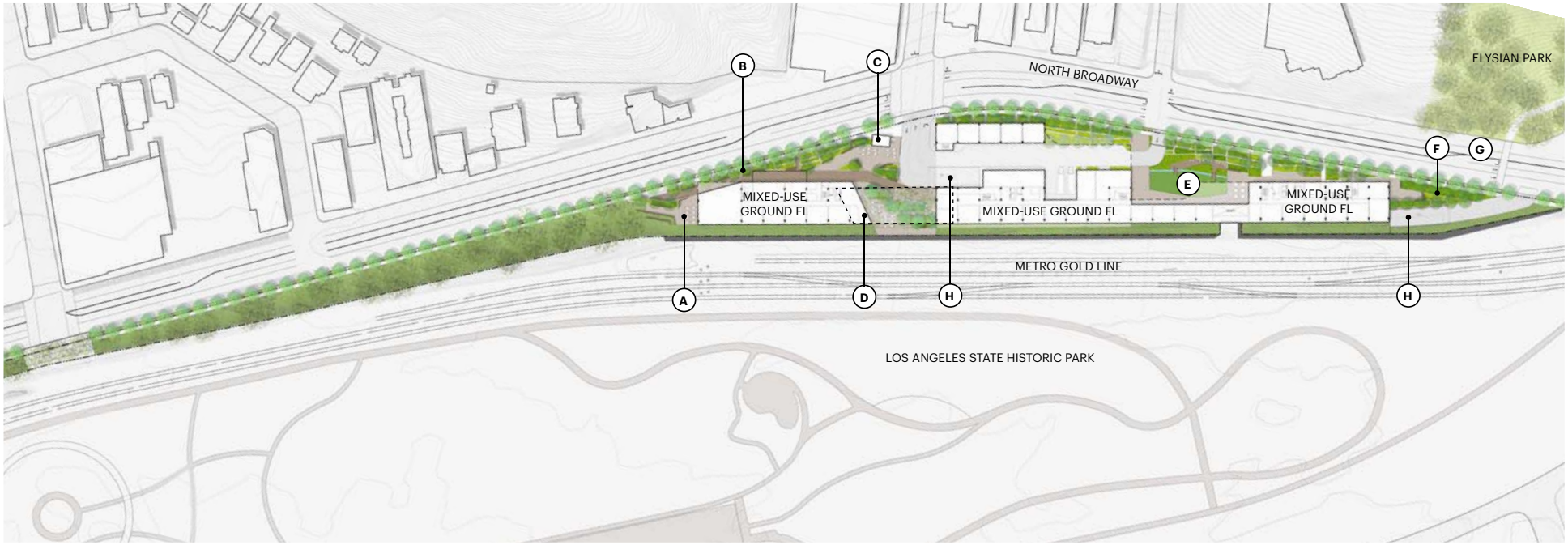
GARDEN TERRACES LEGEND :

- (A) Garden dining terrace
- (B) Public shopping gardens
- (C) Public garden plaza & kiosk
- (D) Landscape Trellis
- (E) Meditation gardens
- (F) Elysian garden connection
- (G) Crosswalk
- (H) Ramp to Parking





SOURCE: RCH Studios 2021

FIGURE 9B

North Parcel –Garden Terraces Landscaping

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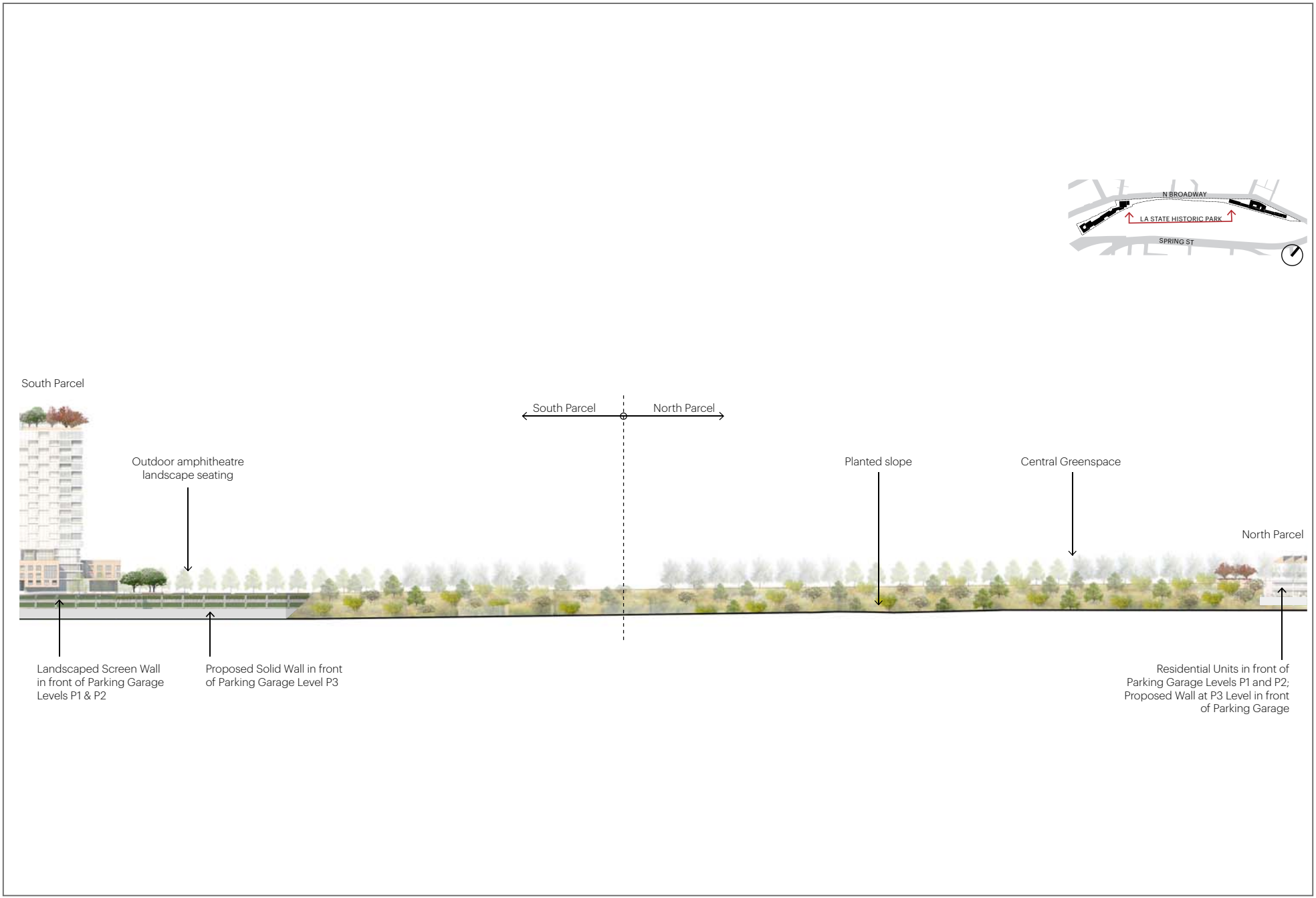

SOURCE: RCH Studios 2021

FIGURE 10

Central Portion – Conceptual Landscaping Plan

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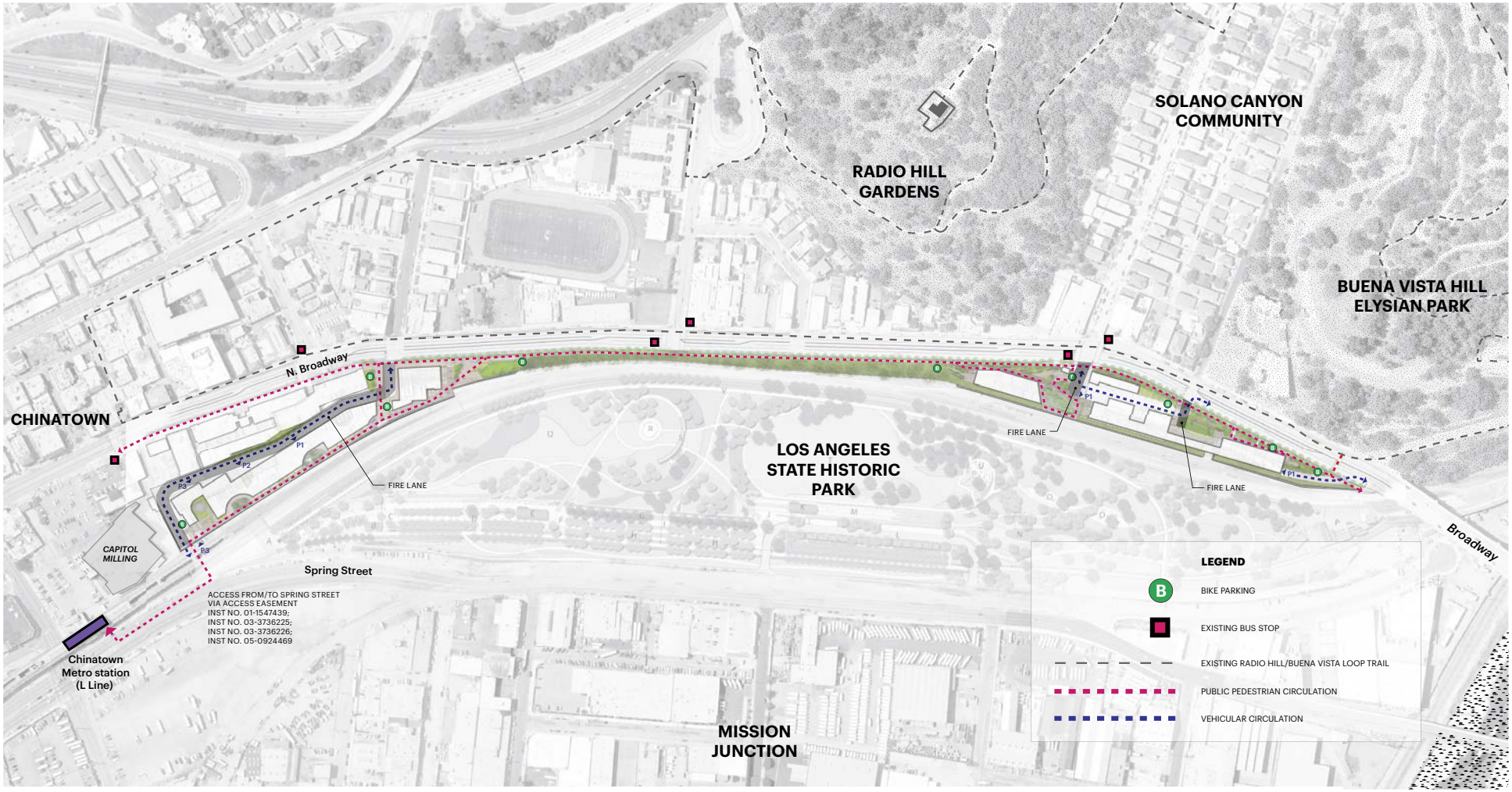

SOURCE: RCH Studios 2021

FIGURE 11

Circulation Diagram

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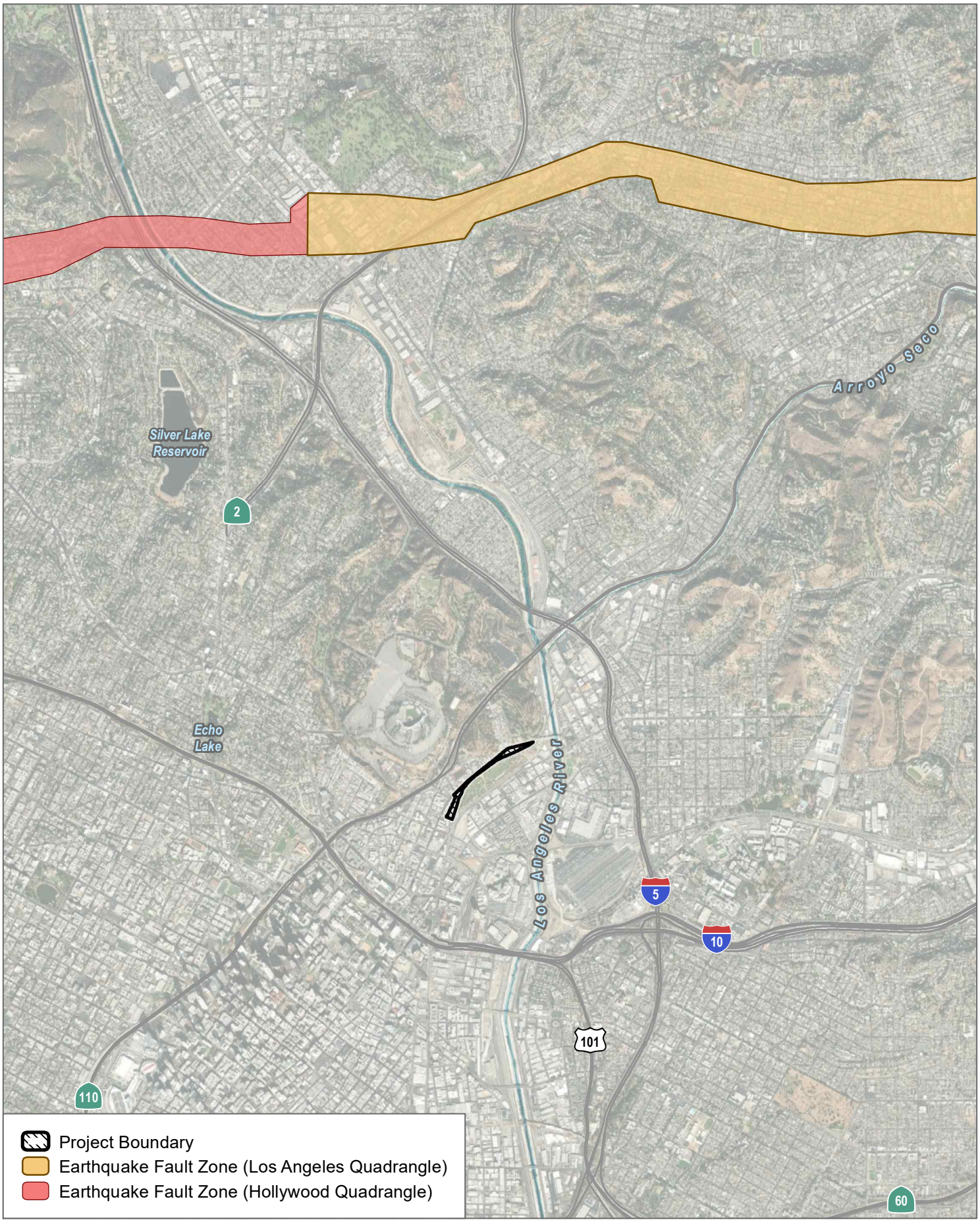

SOURCE: Esri and Digital Globe, Open Street Map 2019

0 2,000 4,000 Feet

FIGURE 12

Alquist-Priolo Fault Zones

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Appendices

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Appendix A

2016 Tree Report, 2020 Tree Survey and Update Memorandum, and 2021 Tree Survey Update Memorandum

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Appendix B
Biological Resources Analysis

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Appendix C

Mineral Land Classification Map